RCRA Part B Post-Closure Permit Application

Book 2 of 3

Submitted to:

U.S. Environmental Protection Agency Region 1 and Connecticut Department of Environmental Protection

Submitted by:

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Section E Groundwater Monitoring

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Section E

Groundwater Monitoring [40 CFR 264 Subpart F]

Section E describes the following efforts taken by Textron Lycoming to comply with the applicable groundwater monitoring requirements for the waste management area:

- installation of a groundwater detection monitoring system, and monitoring of that system from November 1981 to August 1985, in accordance with 40 CFR 265.92
- installation of a groundwater assessment monitoring system, and monitoring of that system from 1985 until the present, in accordance with 40 CFR 265.93
- establishment of background groundwater quality data in accordance with 40 CFR 264.97(g)
- description of the post-closure monitoring activities proposed in accordance with 40 CFR 264.118(b)(1) and 40 CFR 270.14(c)

This section documents the compliance of the facility's detection, assessment, and post-closure groundwater monitoring programs with 40 CFR 264 and 265 Subpart F regulations and applicable EPA RCRA groundwater monitoring guidance established in the "RCRA Groundwater Monitoring Technical Enforcement Guidance Document — September, 1986" (TEGD).

E-1 Interim Status Groundwater Detection Monitoring [270.14(c)(1)]

In accordance with 40 CFR $270.14(c)(1)$, information is presented in this section describing the groundwater detection monitoring program conducted for the former surface impoundments from November 1981 to August 1985 during the RCRA interim status period. AVCO Lycoming conducted groundwater detection monitoring for the surface impoundments during the RCRA interim status period in accordance with 40 CFR 265.92, as required by 40 CFR 265.90. The locations of the interim status detection monitoring wells along with the locations of all other monitoring wells installed to date at the facility are presented in Figure E-1. Construction details for all monitoring wells installed to date are presented in Table E-1. Geologic logs and well completion data documenting the installation of each (monitoring well are included in Appendix E-1.

The area of the facility comprising the four surface impoundments has been designated as the waste management area for the application of 40 CFR 264 Subpart F requirements, as provided by 40 CFR 264.95(b). The approximate limits of this waste management area are delineated in Figure E-1. As defined in 40 CFR 264.95(a), the compliance point is comprised of the vertical surface along the downgradient limit of the waste management area. As described below, the compliance point is principally along the eastern and southern limit of the waste management area, given the predominant groundwater flow patterns in the area.

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Major aspects of the facility's interim status detection monitoring program are summarized below in Sections E-la through E-lc. A summary of data regarding the site's geology,

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TEXTRON LYCOMING STRATFORD/ CONNECTICUT

Table E-1

Monitoring Well Construction Details' Textron Lycoming, Stratford, Connecticut

' All elevations relative to Mean Sea Level (MSL).

² Monitoring wells MW-01D, MW-03D, MW-05D, MW-09 and MW-10 have been renamed MW-01SI, MW-03SI, MW-05SI, MW-09S and MW-IOS, respectively.

 3 MSL = mean sea level.

⁴ March 1991 groundwater elevation data.

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Table E-1, Continued

Monitoring Well Construction Details Textron Lycoming, Stratford, Connecticut

' Top of outer casing used as reference pomt for groundwater surface measurements.

hydrology, and groundwater quality based on work.completed during both the detection, and later assessment monitoring program, is presented in Section E-2.

E-1a Interim Status Groundwater Detection Monitoring System [40 CFR 265.91]

The original interim status groundwater detection monitoring system consisted of the five (5) monitoring wells numbered MW-01 through MW-05. Monitoring wells MW-01, MW-02, MW-03, and MW-05 were installed in November 1981 as compliance point detection monitoring wells for monitoring groundwater quality in the uppermost aquifer immediately downgradient of the four surface impoundments. Monitoring well MW-04 was installed approximately 300 feet north of the equalization lagoon (and approximately 350 feet northwest of the settling lagoons) as an upgradient well for monitoring background groundwater quality, based on an assumed southeasterly groundwater flow direction toward the Housatonic River and Long Island Sound. <

However, initial groundwater elevations measured in these five monitoring wells indicated that the localized groundwater flow direction in the immediate vicinity of the waste management area may be radially outward from the impoundments to the east, south, and west. Therefore, monitoring well MW-04 was not clearly upgradient of the four impoundments. As described below, later groundwater level data and the future installation of additional monitoring wells during the detection and assessment monitoring programs generally confirmed these preliminary conclusions on groundwater flow direction;

In 1983, monitoring wells MW-06 and MW-07 were installed approximately 500 - 650 feet (respectively) north and west of MW-04 to better establish upgradient groundwater quality as required by 40 CFR 265.91(a)(2). MW-06 and MW-07 were added to the RCRA quarterly monitoring program at that time as background monitoring wells. Later evaluation of water level data indicated that these wells, like MW-04, may not adequately represent the quality of groundwater reaching the upgradient limit of the waste management area (see Section E-2c).

All interim status detection monitoring wells were drilled by hollow stem auger techniques. These monitoring wells were completed to depths of 10 to 30 feet below ground level and were screened in the uppermost portion of the water table aquifer (see Table E-1). The groundwater surface elevation was determined to be approximately 5 feet below ground level at monitoring wells MW-01 through MW-07.

All monitoring wells were constructed of two-inch inside diameter flush threaded. Schedule 40 polyvinyl chloride (PVC) riser pipe and factory-slotted 0.01-inch (10 slot) flush threaded PVC well screen. A gravel pack was installed in the annular space from the bottom of the borehole to approximately three feet above the top of the well screen, and a bentonite slurry to two feet below ground level. The monitoring wells were completed with protective steel casings or a flush-mounted cast iron curb box (MW-04 only), and a cement pad to prevent surface infiltration and protect the monitoring well integrity. In addition, the PVC well cap was completed with a vent to allow the water levels within the monitoring well to equilibrate to the prevailing atmosphere pressures. ^

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E-lb Detection Monitoring Sampling Program [40 CFR 265.92]

Groundwater sampling during the interim status detectibn monitoring program was conducted quarterly from November 1981 to August 1985. Specific sampling and analyses conducted during each year of the detection monitoring program are summarized below.

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First Year 1981/1982

The first year of interim status detection monitoring for wells MW-01 through MW-05 was comprised of four sampling events, namely: November, 1981; and March, June, and September, 1982, as required by 40 CFR 265.92(c)(1). Parameters analyzed for during the first year of the detection monitoring program included:

- 40 CFR 265 Appendix III parameters;
- groundwater quality parameters specified in 40 CFR 265.92(b)(2); and
- the indicator parameters pH, specific conductance, total organic carbon (TOC), and total organic halides (TOX);

in accordance with 40 CFR 265.92(b).

Second and Third Years 1983/1984 and 1984/1985

On June 6, 1983, personnel from AVCO Lycoming met with DEP to discuss the ground water detection monitoring program. Based on this meeting, the DEP directed AVCO Lycoming to substitute the following site-specific parameters for those specified in 40 CFR 265.92(d) for the second and subsequent years of detection monitoring:

As described in Section E-la, monitoring wells MW-06 and MW-07 were installed as new upgradient background monitoring wells in July, 1983. Monitoring wells MW-01 through MW-07 were sampled quarterly during the second year (August 1983, November 1983, $\mathbf r$ February 1984, and May 1984) and third year (October 1984, January 1985, April, and August 1985) of interim status detection monitoring, and analyzed for the parameters specified above.

E-1c Detection Monitoring Groundwater Quality Data

All groundwater samples collected during the interim status detection monitoring period were analyzed by a State of Connecticut certified environmental testing laboratory. Quarterly and annual groundwater monitoring reports were prepared and submitted to DEP/EPA throughout the interim status detection monitoring period as required by 40 CFR 265.94.

A summary of detected constituents and indicator parameter data for all interim status groundwater sampling (detection and assessment monitoring) conducted through October 1989 is presented in Appendix E-2, which includes all detection monitoring results (November 1981 - August 1985). A complete discussion of all groundwater monitoring data collected to date for the detection and assessment monitoring programs is presented in Section E-2d. The results of the interim status detection monitoring groundwater analyses are also discussed in Section IV of Appendix E-3.

It should be noted that groundwater samples collected for metals analysis during all but the last year (1984/1985) of detection monitoring were not filtered and therefore total metals concentrations are reported for these samples. Filtered, sediment-free samples yielding dissolved metals concentrations would be expected to contain significantly lower metals concentrations and would be more representative and appropriate for assessing groundwater quality.

Data evaluated to establish which if any of the existing detection monitoring wells were appropriately hydraulically upgradient of the waste management area was continually

inconclusive and somewhat contradictory. Because of this, a single background monitoring V well was not formerly selected during the detection monitoring program. Consequently no statistical comparisons were made in accordance with 40 CFR 265.93(b). However, due to the confirmation of hazardous constituents detected in the compliance point monitoring wells, an assessment monitoring program was initiated in 1985, in accordance with 40 CFR 265.93(d)(4). Details of this assessment monitoring program are presented in Section E-2.

E-2 Groundwater Assessment Monitoring Program

The RCRA groundwater assessment monitoring program for the former surface impoundments was initiated in September 1985 and has continued to the present. The investigation efforts undertaken as a part of the assessment monitoring program were conducted in accordance with 40 CFR 265.93(d)(4) and are summarized below.

Initial Assessment Monitoring Efforts (1985)

In an effort to further assess the hydrogeology and constituent distribution in groundwater surrounding the waste management area, additional subsurface investigative work was conducted in September 1985, including:

- completion of 17 soil borings to further characterize site geology
- installation and sampling of six additional monitoring wells (MW-08 through MW-13) r to provide additional data on constituent distribution and site hydrology

• continuous water level recording of monitoring wells MW-01, MW-05, MW-10, and MW-13 to identify any tidal influence on the water table aquifer The results of this investigation are presented in Sections E-2b through E-2g.

DEP Order HM-358

As a result of DEP's 1986 Comprehensive Monitoring Evaluation inspection, DEP Order HM-358 was issued to Textron Lycoming on September 25, 1986 requesting that a Groundwater Assessment Monitoring Plan be submitted to DEP and implemented following receipt of DEP approval. Order HM-358 was later revised (November 26, 1986 to incorporate compliance dates). A copy of Order HM-358, along with other correspondence with DEP regarding assessment monitoring is included in Appendix E-3.

In response to Order HM-358, Textron Lycoming submitted an Assessment Monitoring Plan to DEP on March 25, 1987 (see Appendix E-4). An addendum to this Assessment Monitoring Plan was submitted to DEP on May 22, 1987 (see Appendix E-5). In addition to the assessment efforts initiated in 1985, the following additional tasks were proposed in the 1987 Assessment Monitoring Plan:

- Compile a complete list of all groundwater monitoring analytical data collected to date to provide quick reference to specific data values
- Compile a summary of statistical data in tabular form for each monitoring well
- Collect continuous water level data over a complete tidal cycle for the tidal drainage ditch, the marine basin, and a minimum of eight monitoring wells. Evaluate this data

to establish the effect of the tidal cycle on the site's groundwater flow patterns.

- Redevelop monitoring wells MW-01 through MW-07 using surge block and pump # techniques to clear well screens and alleviate siltation problems.
- Perform *in-situ* aquifer testing (slug tests) on monitoring wells MW-01, MW-03, MW-04, MW-06, MW-07, MW-08, MW-09, and MW-11 to establish hydraulic conductivity values to use in estimating groundwater flow rates for the uppermost aquifer.
- Graphically evaluate contaminant data by developing the following:
	- ^ concentration vs. time plots for each contaminant, for each monitoring well using all data collected to date
	- concentration contour maps for each contaminant
	- a cross-section indicating vertical and lateral distribution of contaminant concentrations through a slice of the aquifer
- Estimate and evaluate groundwater flow rates and contaminant migration rates
- Continue to monitor the existing 13 well monitoring system quarterly for all detection monitoring parameters specified in Section E-lb

Details of the above assessment efforts are described in Section IX of Appendix E-4.

Installation of Additional Monitoring Wells During Closure

At the-request of DEP, three additional monitoring wells were installed during closure, These three additional wells (MW-01D, MW-03D, and MW-05D) were installed alongside existing wells MW-01, MW-03, and MW-05 (respectively) to form nested well pairs at these three locations. The three new "D" wells were completed with screened intervals at slightly greater depth than the existing three wells to characterize groundwater quality to a depth of 15-25 feet below the water table along the compliance point. MW-01, MW-OID, MW-03, MW-03D, MW-05 and MW-5D were renamed in 1991 as MW-OIS, MW-OISI, MW-03S, MW-03SI, MW-05S and MW-05SI, respectively.

Additional Correspondence on Assessment Monitoring With DEP

On September 21, 1989, DEP issued a letter to Textron Lycoming indicating that it had conducted a Comprehensive Monitoring Evaluation (CME) of the RCRA groundwater monitoring program for the surface impoundments. A copy of this letter along with all other correspondence with DEP regarding assessment monitoring is included in Appendix E-3. This letter stated that DEP believed that Textron Lycoming had made significant progress toward characterizing the rate and extent of groundwater contamination in accordance with ^ applicable regulations. This letter also required Textron Lycoming to respond to DEP with a proposal for performing additional monitoring and evaluation to meet the following objectives:

- establish the hydrogeologic and hydrochemical role of the peat layer
- evaluate the potential for tidally induced backflow of the NPDES discharge

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- evaluate the groundwater mounding effects in the area of the surface impoundments
- assess the hydrologic impacts of the landfill cap
- resolve the discrepancies between the 1987 Assessment Monitoring Plan and the assessment monitoring efforts actually implemented
- ensure adequate field practices, particularly with respect to bailer decontamination procedures, chain-of-custody protocol, and well integrity (MW-OID)

Additional details regarding the above items are presented in DEP's CME Summary Memorandum dated August 11, 1985 (see Appendix E-3).

In response to this September 21, 1989 DEP letter, Textron Lycoming developed a response letter dated April 4, 1990 (addressed to Textron Lycoming by its former consultant, ESE and forward to DEP). This April 4, 1990 letter outlined the following additional or remaining assessment monitoring tasks to be completed by Textron Lycoming:

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- Compile analytical and statistical summary data as specified in the 1987 Assessment Monitoring Plan.
- Resurvey monitoring wells to confirm elevations.
- Manually collect water level data for all monitoring wells (hourly/bi-hourly) and monitor the tidal drainage data using a tide gauge over a 24 hour period to evaluate tidal influences.

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- Conduct a surface electric resistivity and ground penetrating radar survey to determine the lateral and vertical continuity of the subsurface peat layer. (Later eliminated from n assessment monitoring program after high levels of interference and signal attenuation were encountered in the field.)
- Install additional deep monitoring wells to collect water quality data from beneath the peat layer.
- Conduct slug tests on all monitoring wells to establish the hydraulic conductivity of the uppermost aquifer stratigraphic units.

The report prepared to summarize the result of the above efforts outlined in the April 4, 1990 letter is currently being prepared, and will be submitted to DEP and EPA when complete. Hydraulic conductivity and vertical/horizontal gradient data made available to Textron Lycoming from this study has been used to calculate groundwater flow rates in Section E-2c.

In addition, a verbal agreement was reached in 1990 between DEP and Textron Lycoming to change the frequency of certain analyses performed on groundwater samples collected during the quarterly assessment monitoring program. Specifically it was agreed to limit the frequency of volatile organic analyses to semiannual, (it was previously performed quarterly). It was also established that analyses/determination of RCRA indicator parameters (pH, specific conductance, TOC, and TOX) would be performed quarterly.

E-2a Groundwater Assessment Monitoring System

The current groundwater assessment monitoring system is comprised of 13 monitoring locations and 22 monitoring wells indicated in Figure E-1. This monitoring network is currently being used to assess the rate and extent of any contaminant migration from the closed surface impoundments.

All 13 assessment monitoring locations include at least a single "shallow" well screened generally at or near the water table in the uppermost portion (typically the upper $10 - 20'$) of the water table aquifer. In addition, one or more additional wells have been installed and selectively screened at incrementally greater depths to monitor progressively deeper zones of the uppermost aquifer at five selected locations hydraulically upgradient and downgradient of the closed impoundments. These nested groups of 2 to 4 wells at monitoring locations MW-01, MW-03, MW-05, MW-09, and MW-10 also provide data on the geology of the various stratigraphic units present, vertical gradients and vertical groundwater flow, and hydraulic conductivity throughout the upper aquifer. Monitoring wells MW-05D, MW-09D, and MW-IOD were installed in the lower portion of the uppermost aquifer and these borings were completed to bedrock to collect geologic data on unconsolidated materials in the deepest portion of the uppermost aquifer.

The suffix for each monitoring well designation within each of the nested groups $(S = Shallow, SI = Shallow Intermediate, I = intermediate, DI = deep intermediate, and$ $D = Deep$) refer to the progressively deeper zones of the uppermost aquifer that are screened and monitored in each well. Approximate screened intervals (referenced to MSL

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{Mean Sea Level} elevation) for each of these categories of monitoring wells are; $S = 10$ to $-10'$, $SI = -10$ to $-20'$, $I = -25$ to $-35'$, $DI = -30$ to $-40'$, and $D = -70$ to $-100'$. Negative values indicate that the wells are screened below MSL. The specific depth and the screened interval elevations for all wells are indicated in Table E-1.

Wells at monitoring locations MW-01, MW-02, MW-03, and MW-05 monitor groundwater quality at locations immediately downgradient of the surface impoundments. These compliance point wells are used to detect the presence of any constituents that are released from the waste management area.

Wells at the remaining locations monitor downgradient and background groundwater quality beyond the perimeter of the waste management area. These wells are used to further assess the vertical and lateral extent of the groundwater constituents detected at the compliance $\ddot{}$ point. In conjunction with the other wells in the assessment monitoring system, these wells have supplied the necessary water level, hydraulic conductivity, and geologic data to characterize the monitored aquifer, including the rate and direction of groundwater flow.

A description of the construction specifications of monitoring wells MW-01 through MW-07 are presented in Section E-la. Monitoring wells MW-OISI, MW-03SI, and MW-05SI were ^ constructed and installed Similarly. Monitoring wells MW-08 through MW-13 were also \mathcal{L} installed and constructed similarly, with the following exceptions:

- 20 slot 2" PVC well screen was used
- a wrapped screen envelope was used

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• a sand pack was installed in the annular space surrounding the screen

• bentonite pellets were used to seal the annular space above the screen These construction details are summarized in Section II of Appendix E-4. Construction and installation specifications for monitoring wells MW-05DI, MW-5D, MW-09I, MW-09D, MW-IOI, and MW-IOD are described in Appendix E-1, and are essentially similar to monitoring wells MW-08 through MW-13, although no screen envelope was used and a cement bentonite slurry was used to seal the annular space above the bentonite pellet well screen seal.

E-2b Site Geology

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The geology of the uppermost aquifer underlying the waste management area has been established from soil samples logged during installation of the various assessment monitoring wells and other borings completed during the assessment program. These data indicate that the unconsolidated strata above the bedrock layer consist primarily of stratified drift deposits. The uppermost 5 to 15' of deposits consist of fine to coarse sand with a trace of silt, silty r sand, and fill material. These uppermost materials are underlain by a variable and discontinuous layer of organic peat which begins between 6 to 17' below grade where present. The thickness of the organic peat layer varies from 5.5 to 20' where detected. The soils below the peat layer consist primarily of fine to coarse sand with varying amounts of gravel and a trace of silt. Geologic cross sections for borings completed through 1985 are presented in Section II of Appendix E-4.

Bedrock was encountered at depths of 162, 151, and 103 feet below grade in borings completed for monitoring wells MW-05D, MW-09D, and MW-IOD, respectively. These data indicate that bedrock in this area dips downward to the south toward Long Island Sound. Recovered fragments indicate that bedrock consists of homblende-amphibolitic mica schist. $\bigg($ \setminus A description of the closure and final cover design for the surface impoundments is presented in Section I-l. The closure design included excavation and backfilling of the surface

impoundments, as well as installation of a multilayered cap as described in Section I-l. Placement of these materials during closure impacted the hydrology in the waste management area.

A soil/cement mixture was used to stabilize the bottoms of the settling lagoons in order to provide the proper structural bearing strength to adequately support the prescribed thickness of backfill and cover materials specified in the approved Closure Plan. This stabilization process has created a layer of artificial fill at the base of each of the settling lagoons with a hydraulic permeability that may be significantly lower than that of the surrounding undisturbed sediments. Because this stabilized soil/cement mixture was installed approximately $1\frac{1}{2}$ below the water table (at low tide), this material may impact drainage and groundwater movement beneath the impoundment cap of the settling lagoons.

Also, the closure cap contains an impermeable high density polyethylene (HDPE) membrane liner which prevents migration of liquids through the unsaturated zone beneath the cap and

the water table. The cap effectively eliminates groundwater recharge from precipitation in the capped waste management area.

E-2c Site Hydrology

Surface Water

The flow of surface water over the waste management area of the site follows the slight topographic gradient which is generally southward toward the tidal drainage ditch and marine basin. Topographic elevations only vary by approximately 15' over the entire facility, and vary by less than 10' in the vicinity of the waste management area.

The HDPE membrane liner component of the closure cap for the lagoons prevents groundwater recharge from surface water runoff in the vicinity of the waste management area cap. Surface water run-off directly over the management area cap is collected by drainage ditches surrounding the capped area that direct run-off around the perimeter of the cap and into the tidal drainage ditch. Surface water run-off across the overall facility flows to the east toward the Housatonic River, and south toward the marine basin and Long Island Sound. However, most of the facility is covered with buildings and pavement. The majority of the run-off north of Sniffens Lane is captured by the facility's storm water collection system and is discharged to the Housatonic River after treatment in the Oil Abatement Plant. Run-off j from the facility south of Sniffens Lane is either collected in catch basins and discharged to

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the tidal drainage ditch, or flows to the south toward the tidal drainage ditch and the marine basin.

Groundwater

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The data collected to date from the groundwater assessment monitoring system has provided the necessary information to make the following determinations in accordance with 40 CFR 265.93(d)(4):

- groundwater flow direction from water table surface elevation data
- estimation of groundwater flow rate from hydraulic conductivity data

As indicated in Section II of Appendix E-4, groundwater in the uppermost aquifer flowed radially outward from the impoundments prior to closure toward the west, south, and east. A groundwater surface elevation contour map with water level data (May 16, 1991) for all current monitoring wells is presented in Figure E-2, and is representative of groundwater flow in the waste management area after closure.

Overall, horizontal gradients are relatively small across the monitored portion of the facility, except in the immediate vicinity of the waste management area where gradients are somewhat more pronounced. The overall modest horizontal gradients, and the close proximity of \mathbf{I} discharge to the tidal drainage area and the Housatonic River complicate determination of \downarrow groundwater flow direction across the study area.

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Groundwater flow across the site appears to be generally in an easterly direction. However, a localized area of groundwater mounding can be observed in the area of the closed settling lagoons, near lagoons #2 and #3. It is not clear why this apparent mounding anomaly exists in the waste management area. This mounding may be caused by the organic peat layer underlying the shallow portion of the water table aquifer, or the cement/soil stabilization material installed at the base of the settling lagoons during closure to support the final cover. If the permeability of these materials is low relative to the surrounding soils, this could result in a restriction of the vertically downward groundwater flow observed in the area, which may result in the observed mounding. The mounding anomaly could also result from other factors such as a localized area of highly permeable material, surface recharge from surrounding paved areas, or sub-surface recharge from nearby storm drainage systems.

As indicated by the water level data from the nested well groups, vertical groundwater flow in the vicinity of the waste management area appears to be downward in the immediate area of the settling lagoons. This data contradicts the upward vertical groundwater flow typically found in water table aquifers in the vicinity of major discharge zones.

As indicated in Section E-2, water level monitoring has been conducted to determine the degree to which tidal fluctuations in the marine basin, tidal drainage ditch, the Housatonic River, and Long Island Sound affects groundwater gradients and flow patterns in the waste V management area. As presented in Appendix E-5, these data indicate that:

• their is no significant tidal influence in the immediate vicinity of the cap over the three settling lagoons

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- there is a moderate tidal influence at the east end of the equalization lagoon cap, which causes water table fluctuations of approximately $\pm 0.5'$ in monitoring well 4 MW-05S, which quickly dissipates with distance from the drainage ditch
- overall groundwater flow patterns are not significantly impacted by local tidal fluctuations

The flow rate of groundwater in the uppermost aquifer has been estimated based on the horizontal gradient and hydraulic conductivity data supplied to Textron from the study referenced in the April 4, 1990 letter included in Appendix E-3 (see Section E-2).' The Bouwer and Rice analytical method¹ was employed to calculate values of hydraulic conductivity from the slug test data developed during this study. These calculations yielded an average hydraulic conductivity of 23.82 ft/day $(9.33 \times 10^{-3} \text{ cm/sec})$ for all monitoring wells. The rate of groundwater flow in the water table aquifer was computed utilizing the Darcy equation:

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v = \frac{ki}{n}
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where, $v =$ average linear velocity, in ft/day

 $k =$ average hydraulic conductivity, in ft/day

 $i =$ average hydraulic gradient, in ft/ft, and

 $n =$ soil porosity

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¹ Herman Bouwer, The Bouwer and Rice Slug Test - An Update, Ground Water, Vol. 27, No. 3, May-June 1989.

A typical horizontal hydraulic gradient along a flow line in the waste management area is approximately 0.00493 ft/ft. A porosity of 25 percent was assumed to calculate the average horizontal groundwater flow rate of approximately 0.47 ft/day.

A hydraulic conductivity of 3.09 ft/day was calculated for monitoring well MW-05SI which is screened exclusively in the organic peat layer. Assuming a typical porosity of 40% for this material, and using a downward vertical gradient of 0.01117 ft/ft (mean value for nested monitoring well groups MW-05, MW-09, and MW-10), a vertical flow rate of 0.086 ft/day has been calculated for groundwater flow through the organic peat layer to the underlying deposits of sand and gravel.

E-2d Assessment Monitoring Groundwater Quality Data

Quarterly groundwater sampling and analysis for the assessment monitoring program has A proceeded in accordance with the DEP approved parameters and frequency presented in Section E-2. In accordance with 40 CFR 265.93(d)(4)(ii), the assessment monitoring data collected from November 1985 to the present has established the concentration and distribution of the following principal constituents in groundwater in the waste management area:

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- inorganic constituents
	- chromium
	- cadmium
	- nickel
	- cyanide
- volatile organic compounds (VOCs)
	- chlorobenzenes
	- chlorinated ethenes (and associated breakdown products)

Other organic constituents (including 1,1-dichloroethane, 1,1,1-trichloroethane, ethyl benzene, toluene, and xylene) have been detected in groundwater at lower concentrations than the VOC constituents listed above. Copper and zinc have also been detected in groundwater at the compliance point, although these metal constituents are not listed in 40 CFR 261 Appendix VIII, and are therefore not hazardous constituents as defined by 40 CFR 264.93(a).

A summary of all groundwater assessment monitoring data collected from November 1981 $\ddot{}$ through October 1989 is presented in Appendix E-2. Appendix E-2 presents data for all hazardous constituents detected in groundwater and the value of all indicator parameters obtained from the quarterly sampling events through October 1989. Appendix E-6 presents data from the more recent assessment monitoring quarterly sampling events from March 1990 through September 1991. Graphs indicating the variation of concentration over time in each assessment monitoring well (data through May 1990) are presented for several of the

principal inorganic and organic constituents in Appendix E-7. A summary of these data is presented below for each principal constituent.

Inorganic Constituents

A brief summary of the data collected to date for the principal inorganic constituents chromium, cadmium, nickel, and cyanide are presented below. The relatively higher concentrations of these inorganic constituents in compliance point monitoring wells in the early years of the RCRA detection monitoring program (1981-1985) indicate that these constituents may have been released from the four surface impoundments. These constituents were known to be present in the wastes previously managed in the former surface impoundments. However, the dramatic decrease in concentration of these inorganic constituents over the 10 years of RCRA monitoring at the site has reduced the levels of these constituents at the compliance point to very low or undetectable (below the method detection limit) levels. The graphical illustration of this dramatic decrease of these inorganic constituents in groundwater is presented in Appendix E-7 (graphical analysis not available for nickel).

It should be noted that groundwater samples collected for metals during all but the last year (1984/1985) of detection monitoring were^ not filtered and therefore total metals concentrations are reported for these samples. Filtered, sediment-free samples yielding dissolved metals concentrations would be expected to contain significantly lower metals concentrations and would be more representative and appropriate for assessing groupdwater

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quality. This difference in field sampling techniques may account for the significantly higher concentrations of these" inorganic constituents reported prior to 1985.

Chromium

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As indicated by the graphs in Appendix E-7, chromium concentrations have decreased in all monitoring wells over the RCRA detection and assessment monitoring period.^ Total chromium concentrations in compliance point wells (MW-01, MW-02, MW-03, and MW-05) and MW-04 ranged from 0.1 to 0.7 mg/ ℓ in the period 1981 to 1983. Since that time, chromium concentrations have steadily decreased in all wells, and were below (and generally well below or undetectable) the 0.05 mg/ ℓ maximum concentration specified in 40 CFR 264.94, Table 1 (Maximum Concentration of Constituents for Groundwater Protection) from January 1987 through 1990. (Some sporadic detections above this $0.05 \text{ mg}/l$ level have been reported for March and May 1991 and will be confirmed in future quarterly sampling events.) Chromium concentrations in monitoring wells away from the compliance point were near or below the 0.05 mg/ ℓ level initially, and are now generally undetectable.

Cadmium

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As indicated by the graphs in Appendix E-7, cadmium concentrations have generally remained low or undetectable in all monitoring wells over the RCRA detection and assessment monitoring period. Cadmium concentrations in compliance point wells (MW-01, MW-02, MW-03, and MW-05) have ranged from 0.005 to 0.05 mg/ ℓ and have frequently been undetectable. Cadmium concentrations in other wells have generally been undetectable, with some sporadic detections marginally above the 0.01 mg/ ℓ maximum concentration

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specified in 40 CFR 264.94, Table 1. Currently, with the exception of low level detections in the range of 0.01 to 0.025 mg/ℓ (MW-05, MW-09, and MW-10), cadmium concentrations have remained undetectable or below the 0.01 mg/ ℓ maximum concentration specified in 40 CFR 265.94, Table 1.

Nickel

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> Nickel concentrations have generally varied from undetectable to less than $0.1 \text{ mg}/\ell$ at the compliance point, and most other assessment monitoring wells. However, the concentration of nickel in monitoring well MW-03SI (installed in 1989 — formerly MW-03D) have generally varied from 0.016 to 0.598 mg/ ℓ , and on two occasions (July and October 1989) has exceeded 1.0 mg/ ℓ . However, monitoring well MW-03S, which is in the same nested well group as MW-03SI (and screened only 9' shallower) has consistently ranged from undetected to 0.07 mg/ ℓ since 1981. Nickel concentrations in other monitoring wells have generally been below 0.1 mg/ ℓ and are currently undetectable, or marginally above the method detection limit of 0.02 mg/ ℓ . A maximum concentration is not specified for nickel (in 40 CFR 264.94, Table 1.

Cyanide

As indicated by the graphs in Appendix E-7, cyanide concentrations have decreased in all monitoring wells over the RCRA detection and assessment monitoring programs. Cyanide concentrations in compliance point wells (MW-01, MW-02, MW-03, and MW-05) and MW-04 ranged from approximately 0.1 to 1.0 mg/ ℓ in the period 1982 to 1985. Since that time, cyanide concentrations have steadily decreased two to three orders of magnitude in

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compliance point monitoring wells and is generally undetectable. Cyanide concentrations in other assessment monitoring wells have varied from undetectable to as high as 0.05 mg/ ℓ in] the mid-1980s in some wells, but currently are undetectable in all non-compliance point wells. The only detection of cyanide in any of the 22 assessment monitoring wells in the first three quarterly monitoring periods of 1991, was a detection of 0.028 mg/ ℓ of cyanide in 1 MW-02 (May 1991). A maximum concentration is not specified for cyanide in 40 CFR 264.94, Table 1. /

Volatile Organic Compounds /VOCs)

The principal volatile organic (VOC) constituents detected at the site to date are chlorinated ethenes (and their breakdown products) and chlorobenzene compounds, which collectively include tetrachloroethene, trichloroethene, cis/trans-1,2-dichloroethene, vinyl chloride, chlorobenzene, 1,2-dichlorobenzene, and 1,4-dichlorobenzene. Concentrations of one or more of these VOC constituents have been detected in at least one sampling event in each of the sites 22 monitoring wells. ^

However, concentrations of individual VOC constituents vary widely from one well to t another. Some or most of these compounds may have never been detected in a given well. Many of the detections of these VOC constituents have been reported at or near the method detection limit, which for most of these compounds is from 1 to 10 μ g/ ℓ . In addition, for instances in which a detection of a given VOC constituents is reported for a monitoring well in a particular quarter, the same compound was frequently reported as undetected for one or more of the immediately previous and/or subsequent quarters. These type of sporadic

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detections/inconsistencies have frequentiy occurred, even in wells in which concentrations of $\overline{}$ 100 μ g/ ℓ or more have been detected in a particular well of a given VOC compound in a particular quarterly sample event.

It should be noted that a number of different analytical laboratories and sampling contractors have been involved in performing the quarterly sampling and analyses over the past 10 years, which may in part account for the inconsistent VOC results. As presented in Appendix E-2, there are a number of cases where all or most of the above principal VOC constituents have been detected in a given well in a given quarter, and are all reported as undetected for several of the following or previous quarters. This pattern may be indicative of a systematic error attributable to sampling and/or analytical methods.

Despite inconsistencies and variation in the data as noted above, several trends and correlations can be made. Several wells have characteristically low VOC concentrations. Monitoring locations MW-01, MW-09, and MW-10 have generally exhibited concentrations near or below the method detection limit for the principal VOC constituents. In addition, monitoring wells MW-11, MW-12, MW-07, and MW-08 have generally exhibited relatively low concentrations of the principal VOC constituents, either below or only marginally (within an order of magnitude) above the method detection limit. Conversely, some of the remaining wells have exhibited relatively higher concentrations of the principal VOC constituents, as noted below.

Chlorobenzenes

Monitoring wells MW-02, MW-03 exhibit markedly higher concentrations of chlorobenzene compounds, namely chlorobenzene, $1,2$ -dichlorobenzene, and $1,4$ -dichlorobenzene. Concentrations of these chlorobenzene compounds have ranged to over 1,000 μ g/ ℓ in MW-03 (July 1989), but are generally below this level,in MW-02 and MW-03. Again it is important / to note that concentrations of various (or all) chlorobenzene compounds have varied widely and been reported as undetectable in both of these wells for a number of quarters. Chlorobenzene compound concentrations are generally much lower or undetectable in most other assessment monitoring wells.

The elevated concentrations of these chlorobenzene compounds in MW-02 and MW-03 and the relevant absence of these compounds in other wells may indicate that these constituents have been released from the settling lagoons. The closure soil sampling data presented in Appendix I-11 indicates that chlorobenzenes were present in soils underlying the settling lagoons at the time of closure.

Chlorinated Ethenes

This group of VOC compounds comprised of chlorinated ethenes and their breakdown products includes tetrachloroethene, trichloroethene, cis/trans-1,2-dichloroethene, and also vinyl chloride (chlorinated ethene constituents). Cis/trans-1,2-dichloroethene and vinyl chloride are believed to be breakdown products resulting from the reaction and dissociation (reductive dehalogenation) over time of chlorinated ethenes such as tetrachloroethene and trichloroethene in the subsurface environment.

Monitoring well MW-05 exhibits markedly higher concentrations of these chlorinated ethene constituents than the other wells. Concentrations of these constituents have ranged to over 1,000 μ g/ ℓ in MW-05. Elevated concentrations of these chlorinated ethene constituents were also historically detected in monitoring well MW-04, and to a somewhat lesser extent in wells MW-06 and MW-13. Concentrations of trans-1,2-dichloroethene in these three wells have ranged as high as several hundred μ g/ ℓ . However, current concentrations of all chlorinated ethene constituents in wells MW-04, MW-06, and MW-13 have dramatically decreased and have remained near or below method detection limits. A detection of 280 μ g/ ℓ of trans-1,2-dichloroethene was reported for monitoring well MW-10D for the September 1991 quarterly sampling event. Because this is the first sampling event for well MW-IOD that included VOC analysis, future VOC monitoring data will be used to confirm this detection.

Again it is important to note that concentrations of various (or all) of these chlorinated ethene constituents have varied widely and have been reported as undetectable in each of the wells noted above for a number of quarters. The concentrations of these chlorinated ethene constituents are generally near or at method detection limits in all assessment monitoring wells, with the exception of MW-05S. The elevated concentrations of these chlorinated ethene constituents in MW-05 and the relevant absence of these compounds in other wells r may indicate that these constituents have been released from the equalization lagoon.

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E-2e Statistical Background Data

All data collected to date from detection and assessment monitoring programs have been statistically evaluated to establish the background monitoring data for each well, as specified in Appendix E-4, Section 9.1. This data which includes the mean, geometric mean, and variance, and maximum value for each monitoring parameter for each monitoring well is presented in Appendix E-8. This data may be used to make future statistical comparisons of monitoring data, as required.

E-2f Correlation of Monitoring Data with Waste Constituents

The only principal constituents (as identified in Section E-2d) that were previously identified as being present in the wastes managed in the former surface impoundments and detected in) compliance point wells are cadmium, chromium, nickel, and cyanide. Over the 10 years of RCRA groundwater monitoring at the site, the concentrations of cadmium, chromium, and cyanide have decreased dramatically. Nickel concentrations have generally remained below 0.1 mg/ ℓ (with the exception of MW-03SI) throughout the RCRA monitoring program.

With respect to the principal VOC constituents identified in Section E-2d, Textron Lycoming has not located any records documenting the management of any wastes or other materials containing these constituents in any of the former surface impoundments. It has never been the intent or practice of Textron Lycoming to manage wastes or other materials containing these VOC constituents in the former surface impoundments. As presented in

Section C, a volatile organic analysis performed on a sample of sludge waste material from the chemical waste treatment system indicated that no volatile organics were present. However, VOC constituents were detected in samples of the soil underlying the lagoons that were collected during closure (see Appendix I-ll).

E-2g Constituent Distribution in Groundwater [40 CFR 270.14(c)(4)]

In accordance with 40 CFR 270.14(c)(4), information is provided in Section E-2d regarding the concentration and distribution of 40 CFR 264 Appendix IX constituents in groundwater in the vicinity of the waste management area. The constituents detected in groundwater in the waste management area migrate in the prevailing direction of groundwater flow (generally south and east) toward discharge into the tidal drainage ditch, marine basin. Long Island Sound, and possibly the Housatonic River.

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In accordance with 40 CFR 270.14(c)(4), due to the short distance to the surface water discharge area from the impoundments, any constituent plume specifically associated with these waste management units would generally migrate immediately to the south and east from the surface impoundments to the adjacent surface water discharge area. Due to the groundwater mounding observed in the immediate area of the former settling lagoons, constituents released from these impoundments may have extended radially outward firom the waste management area for some short distance before meeting the prevailing southeasterly groundwater flow.

The localized groundwater flow anomalies in the former waste management area preclude Textron Lycoming from graphically delineating this plume as required by 40 CFR 270.14(c)(4)(i). Further review and evaluation of the most recent groundwater flow data, and the results of the on-going assessment monitoring program will enable further delineation of any inorganic constituent plume. Principal inorganic constituents present in groundwater which may have been released from the impoundments include cadmium, chromium, nickel, and cyanide. However, the current concentrations of these constituents in groundwater are generally undetectable or present at concentrations only marginally above the method detection limit in most wells, and as such do not constitute a significant constituent plume.

A groundwater plume(s) containing the principal VOC constituents identified in Section E-2d is also present in the waste management area. If such a plume were to emanate from the \overline{a} former surface impoundments, it would have the same general shape as that indicated above for the inorganic constituents.

E-3 Post-Closure Groundwater Monitoring Program [40 CFR 270.14(c)(5)]

This section describes the groundwater monitoring activities proposed to monitor the waste management area throughout the post-closure care period in accordance with 40 CFR 264.118(b)(1). The groundwater monitoring system described in Section E-2, or possibly additional or alternate monitoring wells installed prior to initiation of the permitted

portion of the post-closure care period will be monitored throughout the post-closure care period to detect any releases to groundwater that could potentially occur from the waste management area. •

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The post-closure groundwater monitoring program proposed for the post-closure care period is presented in Sections E-3a through E-3f. Compliance monitoring in accordance with 40 CFR 264.99 has been selected for the outset of the post-closure monitoring program as required by 40 CFR 270.14(c)(7) due to the detection of hazardous constituents in groundwater (see Section E-2d). However, based on the results of the ongoing assessment monitoring program described in Section E-2, the post-closure compliance monitoring program (i.e. numbers and locations of wells, monitoring parameters, and length of compliance period) described in this Section may be modified prior to the initiation of the permitted portion of the post-closure care period, or an appropriate detection or corrective action monitoring program may be proposed.

In accordance with 40 CFR 264.96, Textron Lycoming proposes to conduct the compliance monitoring program described in this section during post-closure care for a compliance period of two (2) years. Textron Lycoming proposes to discontinue the compliance monitoring program at the end of two years and initiate an appropriate detection monitoring program, contingent upon the following:

• the concentration of all Appendix IX Constituents detected in the compliance monitoring system are below the limits listed in 40 CFR 264.94 Table 1, or any alternate limit established under 40 CFR 264.94(b) (see Section E-3d)

• in accordance with 40 CFR 264.99(i), any detections of Appendix IX constituents at concentrations above limits listed in 40 CFR 264.94 Table 1, or any alternate limit established under 40 CFR 264.94(b) (see Section E-3d) are determined to be the result of a release from a source other than the former surface impoundments

Unless a future application for permit modification is submitted specifying an alternative detection monitoring program, the detection monitoring program initiated at the end of the two year compliance period will be identical to the compliance monitoring program proposed in Sections E-3a through E-3e, with the exception of the annual 40 CFR 264 Appendix IX monitoring (Section E-3c(2)). However, if the results of the compliance monitoring indicate that initiation of a corrective action monitoring program is required, the procedures outlined in Section E-3f will be implemented.

E-3a Post-Closure Groundwater Monitoring System [40 CFR 270.14{c)(7)(v)l

The groundwater assessment monitoring system will be used to monitor groundwater in the vicinity of the waste management area during the post-closure care period. This post closure groundwater monitoring system meets all applicable requirements of 40 CFR 264.97. The locations of these monitoring wells are presented in Figure E-1.

Monitoring locations MW-01, MW-02, MW-03, and MW-05 are positioned hydraulically downgradient of the four surface impoundments and will be used as the compliance point monitoring wells. All nested wells at these monitoring locations will be monitored, including MW-OIS, MW-OISI, MW-02, MW-03S, MW-03SI, MW-05S, MW-05SI,' MW-05DI, and MW-05D.

The remaining wells in the monitoring system MW-04, MW-06, MW-07, MW-08, MW-09S, MW-09I, MW-09D, MW-IOS, MW-IOI, MW-IOD, MW-11, MW-12, and MW-13 will be used to monitor groundwater surface elevations for each semi-annual sampling event. This data will be used to complement groundwater surface elevation data collected from the other wells to better assess groundwater flow patterns during the post-closure care period. Sampling of wells at these locations is not warranted during the compliance post-closure period due to the fact that they are either removed from the compliance point (MW-08, MW-09, and MW-11), or are not located downgradient of the waste management area (MW-04, MW-06, MW-07, MW-10, MW-12, and MW-13). Also, concentrations of the principal constituents (outlined in Section E-2d) detected in compliance point wells have generally been orders of magnitude lower or non-detectable in these wells.

E-3b Post-Closure Groundwater Sampling Plan

In accordance with 40 CFR 264.99 (f) , compliance monitoring sampling events will be conducted semi-annually during and after the compliance period portion of the post-closure care period. A schedule for these post-closure monitoring sampling events is presented in Table E-2. The 40 CFR Appendix IX screening analysis will be performed on samples collected annually from compliance point monitoring wells in the first semi-annual sampling event. A schedule for post-closure groundwater monitoring reporting is presented in Section E-3e.

Table E-2

Post-Closure Monitoring Schedule for Groundwater Sampling Events

Depending on the results of the compliance monitoring program, an application for permit modification proposing a detection or corrective action monitoring program will be submitted at the end of the compliance period, if required. As required, such a permit modification will describe all changes to the scope, frequency, and scheduling of monitoring for the remainder of the post-closure care period.

For each scheduled post-closure sampling event, one groundwater samples will be collected from each of the following monitoring wells: MW-OIS, MW-OISI, MW-02, MW-03S, MW-03SI, MW-05S, MW-05SI, MW-05DI, and MW-05D (or possibly additional or alternate monitoring wells installed prior to the permitted portion of the post-closure care period).

Groundwater samples will be collected and analyzed for the parameters presented in Section E-3c. All groundwater monitoring activities will be performed in accordance with the EPA

TEGD, and conducted under the supervision of a qualified geologist or hydrogeologist. A summary of the sampling methodology to be used for each post-closure groundwater sampling event is presented in Sections E-3b(1) through E-3b(4).

E-3b(1) Monitoring System Inspections

At the time of each post-closure monitoring sampling event, prior to the collection of any groundwater samples, an inspection of each monitoring well will be conducted to establish the continued integrity of the monitoring system. Typical inspection forms providing checklists for conducting these monitoring system inspections are presented in Figure E-3. These Post-Closure Groundwater Monitoring System Inspection Report Forms will be completed and submitted to the Textron Lycoming Post-Closure Contact as described in Section E-3e.

As indicated in Figure E-3, each monitoring well will be sounded to obtain a depth measurement to the bottom of the monitoring well. These measurements will be compared to the original depth to bottom measurements to assess the degree of sedimentation that has occurred in each monitoring well since the time of installation. The inner casing, outer casing, and surface grouting around each well will also be visually examined to identify any evidence of deterioration or malfunction.

Figure E-3

Typical Post-Closure Groundwater Monitoring System Inspection Report Form

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Figure E-3, Continued

Typical Post-Closure Groundwater Monitoring System Inspection Report Form

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In the event that a need for maintenance is identified during implementation of the post-closure monitoring program which compromises monitoring well integrity or precludes the ability to sample, prompt maintenance actions will be taken and sampling will be temporarily delayed until appropriate maintenance has been completed. If it is determined that such maintenance is required and may impact the groundwater monitoring reporting $\frac{1}{2}$ schedule presented in Section E-3e, the EPA Regional Administrator and the DEP Commissioner will be notified.

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E-3b(2) Groundwater Surface Elevation

Prior to groundwater sampling, groundwater level measurements will be taken at each monitoring well to determine the volume of water present in each of the monitoring wells to be sampled and to determine the direction of groundwater flow. The groundwater level measurements will later be tabulated and contoured for the monitoring wells. Groundwater level measurements will be obtained using an electric water level recorder. The water level recorder will be decontaminated with a analyte-grade methanol rinse and an analyte-free de-ionized water rinse between monitoring wells.

Groundwater flow rate will also be estimated annually using the hydraulic conductivity data and procedure referenced in Section E-2c, and the groundwater surface gradient calculated from the most recent groundwater surface elevation data. These determinations will be made annually in accordance with 40 CFR 264.99(e), as described in Section E-3e.

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E-3b(3) Groundwater Sampling Quality Assurance/Quality Control (QA/QC)

Field QA/QC procedures to be used for the semi-annual sampling events will be based on guidelines set forth in the RCRA Groundwater Monitoring Technical Enforcement Guidance Document (TEGD).

To assess groundwater sampling equipment decontamination procedures, two field blanks will be collected during each groundwater sampling event. One field blank will be collected by pouring de-ionized analyte-free water supplied by the laboratory through one of the pre-cleaned teflon bailers used that day for groundwater sampling. The other field blank will be collected by rinsing the vacuum filtration apparatus with analyte-free de-ionized water. The rinsate will be collected in appropriate laboratory-supplied containers. The bailer field blank will be analyzed for the same constituents as the groundwater samples collected on that day. The filtration apparatus field blank will be analyzed for only the same metals constituents as the groundwater samples collected on that day.

Teflon bailers used to collect groundwater samples during the post-closure monitoring program and vacuum filtration equipment will be decontaminated under controlled laboratory conditions (pre-cleaned) prior to field mobilization, or in the field (as required) using the following procedure:

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- 1. Alconox and tap water wash
- 2. Tap water rinse
- 3. 10% Nitric acid solution rinse
- 4. De-ionized water rinse

5. Reagent-grade methanol rinse

6. Air dry '

7. "De-ionized water rinse

Cleaned sampling equipment will be wrapped in aluminum foil (shiny-side out) when transported into the field. Upon collection, groundwater samples will be immediately transferred from the pre-cleaned teflon bailer directly into the laboratory-supplied containers. A new pair of disposable latex surgical gloves will be worn during the collection of each groundwater sample. Appropriate quantities of the preservatives specified in Table 4-1 of the TEGD (see Appendix E-10) for each group of analytical parameters presented in Section n E-3c will be added to the sample containers.

One trip blank will accompany sample containers for each sampling event. The trip blank will consist of a set of 40 milliliter vials containing analyte-free de-ionized water supplied by the laboratory. The purpose of the trip blank will be to detect the presence of laboratory-induced volatile organic compounds which may be introduced into sample containers during their preparation or during the extraction of the groundwater samples in the laboratory.

All field metering equipment for the measurement of temperature, pH, and specific conductivity will be calibrated prior to use during each sampling event. pH and specific conductance will be measured in the field in quadruplicate for each well. The parameters pH and specific conductance will be measured prior to well evacuation, after the removal of each well volume, and after sampling as a check on the stability of the sampled groundwater over time.

Sample containers will be labelled with the following information:

- project name;
- unique sample identification;
- analysis to be performed;
- sampling date; and
- preservative identification, if applicable.

Sample containers will be packaged in shipping coolers containing a sufficient amount of protective packaging material to prevent breakage. Ice packs will be packaged with the sample containers to maintain a temperature of 4° Celsius. Samples, accompanied by the chain-of-custody records will be shipped to the laboratory within 24 hours of collection via j courier or overnight shipment.

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E-3b(4) Groundwater Sampling Procedure

Groundwater samples will be collected using the following procedure:

- 1. Calibrate pH and specific conductance meters with appropriate buffer solutions and water of known specific conductance prior to each sampling event.
- 2. Unlock protective casing, remove monitoring well cap and sample air near well head for volatile organic compounds using an HNu photoionization detector.
- 3. Measure and record the static groundwater level using an electric water level indicator. Groundwater measurements will be recorded to 0.01 feet. The depth to the bottom of the well Will also be measured.
- 4. Compute the volume of groundwater in the well casing and surrounding gravel pack. A minimum of five times this volume will be evacuated (purged) from each monitoring well using a centrifugal pump prior to sampling. A valve will be used to restrict the flow until stabilized drawdown has been achieved. The groundwater will be pumped in such a way as not to cause turbulence that may strip out volatile organic compounds. The resulting specific capacity will then be computed. In addition, a check valve will be placed at the intake of the hose to prevent the groundwater from back-flowing into the monitoring well.
- 5. Measure temperature, pH, and specific conductance prior to well evacuation, after the removal of each well volume, and at the end of sampling to monitor the stability of the samples of groundwater over time.

- 6. Remove two bailers of groundwater from each well prior to sampling using a precleaned bailer.
- 7. Collect the groundwater sample using a pre-cleaned teflon bailer and unused length of polypropylene rope. The rope and bailer will not contact the ground during sampling. The order in which groundwater parameters will be sampled are as follows (includes parameters for 40 CFR 264 Appendix IX sampling rounds);
	- Volatile organic compounds (VOCs)
	- Semivolatile organic compounds
	- Polychlorinated biphenyl compounds (PCBs)
	- \prime Metals
		- Cyanide
		- Sulfide

Samples will be collected and transferred to sample containers in a manner that prevents agitation of the sample to minimize the escape of any VOCs during sampling.

- 8. Samples collected for metals analysis will be field filtered with a vacuum filtration apparatus equipped with a 0.45 micron filter and submitted for dissolved metals analysis.
- 9. Label and place all sample containers into shipping coolers containing ice packs. / Record sampling details in field notebook and complete the chain-of-custody form.
- 10. Decontaminate the thermometer, and pH and specific conductance meters with analyte-free deionized water. The bailer, rope, and surgical gloves used will be • discarded in plastic bags and replaced.
- 11. Repeat Steps 2 through 10 for each monitoring well sampled.
- 12. Collect one field blank from a pre-cleaned bailer prior to sampling and analyze for the same constituents as groundwater samples collected that day. Collect one field blank from the filtration apparatus after decontamination (between filtering groundwater samples) and analyze only for the same metals constituents as ^ , groundwater samples collected that day. The field blanks will be collected to ensure that proper field equipment decontamination procedures were performed.
- 13. One trip blank will accompany each shipment of groundwater samples. The trip blank will be analyzed for volatile organic compounds only.
- 14. Sample containers will be properly packaged in shipping coolers and transported to the laboratory via a courier or shipped overnight. Samples from each sampling event will be shipped to the laboratory within 24 hours after collection. Shipping papers and chain-of-custody records will accompany the samples during transit.

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E-3c Groundwater Analytical Parameters and Methods [40 CFR 270.14(c)(7)(iii)]

In accordance with 40 CFR 270.14(c)(7)(iii), the analytical parameters and methods proposed ' for the compliance period are presented in Sections E-3c(l) and E-3c(2). Laboratory QA/QC procedures for groundwater analyses are presented in Section E-3c(3).

E-3c{1) Semi-annual Post-Closure Monitoring Anaiytical Parameters and Methods ^

All semi-annual groundwater samples collected as described in Section E-3b will be analyzed for the 40 CFR 264 Appendix IX parameters presented in Table E-3 throughout the compliance period and remainder of the post-closure care period. These parameters are proposed based on the data presented in Section E-2d, and may be revised or supplemented as appropriate based on the results of the ongoing assessment monitoring currently being conducted.

The EPA-approved analytical methods to be used for each of these parameters and the \ corresponding Practical Quantitation Limits (PQLs) are also indicated in Table E-3. Actual method detection limits may be below the PQLs indicated in Table E-3. The rationale for selecting these parameters/constituents for groundwater monitoring during the post-closure care period is presented in the following sub-sections.

Table E-3

Post-Closure Groundwater Monitoring Analytical Parameters

' From "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846).

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² Estimated Method Detection Limit from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-46).

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RCRA Indicator Parameters — The RCRA indicator parameters pH and specific conductance have been selected to provide broad identification of potential groundwater quality impacts caused by any releases of organic or inorganic constituents. The RCRA indicator parameters TOC and TOX are not included because compound-specific quantitative analysis will be performed during each semi-annual sampling round for halogenated and non-halogenated organics, in addition to analyses for additional 40 CFR 264 Appendix IX organic compounds.

Site Specific Volatile Organics — EPA Method 8240 analysis has been selected to monitor the concentrations of volatile organic constituents (VOCs) detected in compliance point wells in previous detection and assessment monitoring (see Section E-2d). These VOC constituents include: 1,1,1-trichloroethane, chloroform, methylene chloride, chloroethane, trichloroethene, 1,1-dichloroethane, chlorobenzene, 1,2-dichlorobenzene, 1,4-dichlorobenzene, tetrachloroethene, vinyl chloride, cis/trans-1,2-dichloroethene, benzene, toluene, xylene, and ethylbenzene. These organic species were all reported as non-detected

in a sludge sample collected from the former surface impoundments (see Section C-2), but several were detected in closure soil samples collected after the impoundments were

Site Specific Metals — Cadmium, chromium, and nickel have been selected as monitoring parameters due to their presence in compliance point monitoring wells identified during the detection and assessment monitoring programs (see Section E-2d). These inorganic constituents were present in the sludge stored in the settling lagoons and have been

excavated.

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historically detected in groundwater at the compliance point. However, the current concentrations of these constituents in groundwater at the compliance point are generally undetectable, marginally detectable, and/or below their corresponding concentration limit from 40 CFR 264.94, Table 1 (where applicable).

E-3c(2) Annual 40 CFR 264 Appendix IX Monitoring Analytical Parameters and Methods

A screening analysis for 40 CFR 264 Appendix IX (Appendix IX) constituents will also be conducted for all compliance point monitoring well locations annually during the compliance period in accordance with 40 CFR 264.99(g). Screening for Appendix IX constituents will be conducted each year during the first semi-annual sampling event (see Table E-2). The EPA-approved analytical methods specified in 40 CFR 264 Appendix IX will be used for each Appendix IX constituent. If any additional Appendix IX constituents are detected based on annual Appendix IX screening analysis, these constituents will be added to the semi annual monitoring list presented in Table E-3, as described in Section E-3f.

The following wells have been selected as the compliance point monitoring locations for Appendix IX screening analysis: MW-OIS, MW-02, MW-03S, and MW-05S. Monitoring wells specified at locations where nested well groups have been installed (MW-01, MW-03, and MW-05) were selected based on the relatively higher levels of Appendix IX constituents previously detected in these individual wells, as compared to the other well(s) in the same

nested monitoring group. The remaining well(s) in each nested monitoring group will be analyzed for the semi-annual Appendix IX monitoring constituents listed in Table E-3.

The following Appendix IX parameters, grouped by analyte type and analytical methods, are proposed for Appendix IX screening (with EPA-approved analytical methods indicated):

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- volatile organic compounds (EPA Method 8240)
- Appendix IX metals (EPA SW-846 methods see Appendix E-9)
- total cyanide (EPA Method 9010)
- semi-volatile organic compounds (EPA Method 8270)
- PCBs (EPA Method 8080)
- sulfide (EPA Method 9030)

A detailed list of all Appendix IX constituents to be analyzed under each of the above methods is presented in Appendix E-9. Appendix E-9 lists the common name, chemical abstracts name, CAS No., and Practical Quantification Limit (PQL) for each analyte included in the parameter groups specified for each EPA-approved method listed above.

It is proposed to exclude pesticide and herbicide parameters from the annual Appendix IX screening analysis because no detections of these compounds were reported for first year (1981/1982) detection monitoring of 40 CFR 265 Appendix III compounds in compliance point wells. It is also proposed to exclude polychlorinated dibenzo-p-dioxin and dibenzofuran compounds from the Appendix IX screening analysis because there is no record indicating that these compounds were ever used on site.

E-3c(3) Laboratory Quality Assurance/Quality Control (QA/QC) Procedures

Laboratory QA/QC procedures will comply with the requirements set forth in EPA SW-846 ' "Test Methods for Evaluating Solid Waste: Physical/Chemicd Methods", third edition, November, 1986. At a minimum, the specific QA/QC procedures used on every set of samples will include:

Organic Compounds

• Preparation Blank Analysis

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- Matrix Spike/Matrix Spike Duplicates
- Surrogate Spike Recovery

Inorganic Compounds

- Preparation Blank Analysis
- Sample Spike Analysis
- Sample Duplicate Analysis
- Laboratory Control Samples
- ICP Interference Check Sample Analysis

Laboratory data documenting these QA/QC measures will be incorporated in the original laboratory reports and will be maintained on file at Textron Lycoming during the post-closure care period.

E-3d Groundwater Protection Standard [40 CFR 270.14(c){7){iv), 264.941

Due to the status of the on-going assessment monitoring program, a groundwater protection standard for the compliance monitoring program has not been included. Textron Lycoming will develop a groundwater protection standard in accordance with 40 CFR 264.94 for the waste management area. As provided by 40 CFR 264.94(a)(3), Textron Lycoming may establish alternate concentration limits that are protective of human health and the environment in accordance with 40 CFR $264.94(b)$. Alternate concentration limits may be appropriate for the waste management area for the following reasons:

- Groundwater beneath the waste management area is naturally unfit for human consumption due to the high salinity as a result of the proximity to the Housatonic River estuary. Long Island Sound, and the tidal drainage ditch. Chloride levels in monitoring well MW-05S have ranged as high as $4,241$ mg/ ℓ , and sodium levels in MW-05S have ranged as high as $2,809$ mg/ ℓ .
- Groundwater beneath the waste management area is not used as a drinking water supply, nor are there any drinking water wells located downgradient of the site.
- Groundwater beneath the waste management area does not discharge to any surface water body or other aquifer that is a potential drinking water source. All groundwater beneath the waste management area discharges directly to Long Island Sound, a Class SC/SB surface water body.
- The only environmental receptors of concern are the aquatic organisms of Long Island Sound.

Establishment of alternate concentration limits for the groundwater protection standard in accordance with 40 CFR 264,94(b) would require:

- Identification of all Appendix IX hazardous constituents present in groundwater at the compliance point.
- Evaluation and establishment of site-specific groundwater exposure pathways from the waste management unit. \mathbf{r}
- Evaluation and/or modeling of Appendix IX constituent transport in groundwater (including its ultimate discharge to surface water).
- Identification of receptors along each exposure pathway and evaluation of any resulting risks to human health and the environment.

Based on the above, an appropriate groundwater protection standard may be proposed for the site in accordance with 40 CFR 264.94(b).

The data already obtained from the 1991 assessment monitoring events are currently being reviewed and evaluated. Once the data is completely reviewed, Textron Lycoming will determine whether there is sufficient information to develop alternate concentration limits for the groundwater protection standard. Textron has not yet received its final report regarding the following assessment monitoring activities conducted in 1991:

• New nested monitoring wells were installed in May 1991 to investigate deeper zones of the uppermost aquifer.

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- Water level measurements to evaluate any variations of groundwater surface elevations as a result of the local tidal cycle were completed in 1991.
- Water level measurements collected from existing and new monitoring wells in 1991 have clarified and confirmed the somewhat complex groundwater flow patterns in the vicinity of the waste management area indicated by previous monitoring data.
- New data obtained from the additional nested wells installed during 1991 that will allow evaluation of the vertical gradients and vertical groundwater flow patterns at the site.
- Slug testing was performed on all monitoring wells in 1991 to establish groundwater hydraulic conductivity and flow rates for the uppermost aquifers.

The above information is essential to developing a groundwater protection standard for the waste management area. The report being prepared to summarize the findings of the above monitoring activities has not yet been received by Textron Lycoming.

In addition, the following issues also complicate the establishment of a groundwater protection standard for Appendix IX constituents:

- groundwater flow anomalies in the former waste management area
- close proximity to an irregularly shaped surface water discharge area
- tidal influence in groundwater discharge areas

The most recent monitoring data from the assessment monitoring program will be evaluated, and supplemented with any additional or evaluation investigation required to resolve the above issues so that a groundwater protectfbn standard may be developed. Using this data, Textron Lycoming has already begun to prepare a groundwater protection standard for post-closure monitoring of the waste management area. The groundwater protection standard will meet all applicable requirements specified in 40 CFR 264.94. Upon completion, this groundwater protection standard will be submitted to DEP and EPA.

E-3e Post-Closure Monitoring Reporting [40 CFR 264.99(d)]

The Post-Closure Contact (see Section I-2e) will be responsible for the reporting and recordkeeping associated with the post-closure groundwater monitoring program. During the post-closure care period, groundwater monitoring data will be collected semi-annually as indicated in Table E-2. The results for post-closure monitoring will be reported to the EPA Regional Administrator and the DEP Commissioner semi-annually. An annual report will be included with the second of two semi-annual monitoring reports each year. The schedule for reporting this data is presented below in Table E-4.

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Table E-4

Schedule for... | Report Submitted to EPA/DEP on or before... 1 Semi-Annual Post-Closure Monitoring Reports 1st Semi-Annual June 30 2nd Semi-Annual | December 31

Post-Closure Groundwater Monitoring Reporting Schedule

Semi-annual compliance monitoring reports for the post-closure care period will include the following information:

- presentation of the groundwater monitoring analytical data for the most recent sampling round ^
- determination of groundwater flow data
- statistical comparisons including the groundwater monitoring analytical data for the most recent sampling round

All annual reports will include the following information:

- presentation of all groundwater monitoring analytical data for the year
- statistical comparisons using the entire year's data
- groundwater elevation data for the entire year
- determination of groundwater flow direction
- estimation of groundwater flow rate

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Statistical comparisons will be performed in accordance with 40 CFR 264.97(h) as required ! by 40 CFR 264.99(d). Analysis of Variation (ANOVA) or an alternate method specified in ^I 40 CFR 264.97(h) will be used to compare the mean data for each constituent detected in each compliance point monitoring well to the groundwater protection standard. If required, some data collected from the detection and assessment monitoring programs will be used along with the compliance monitoring data to make the required statistical comparisons required by 40 CFR 264.99(d).

The Post-Closure Contact will maintain on file throughout the post-closure care period all monitoring data, all monitoring reports submitted, and all laboratory QA/QC submittals for the detection monitoring system. The Post-Closure Contact will also maintain on file all monitoring system inspection records as described in Sections E-3b(1) and I-2b(3). .

If after receipt of the most recent monitoring data, the Post-Closure Contact determines that:

• an exceedance of groundwater protection standards established under 40 CFR 264.94, or

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• detection of an additional Appendix IX constituent,

has occurred at the compliance point, the EPA Regional Administrator and the DEP Commissioner will be notified and appropriate actions will be taken as described in Section E-3f.

If any events occur that may impact Textron Lycoming's ability to meet the post-closure monitoring reporting schedule presented in Table E-4 (i.e., difficulty with laboratory

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turnaround, damage to monitoring system integrity, etc.), the EPA Regional Administrator and the DEP Commissioner will be notified prior to the scheduled reporting date.

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E-3f Compliance and Corrective Action Monitoring Notification Requirements [40 CFR 264.99(g), (h), (i), and (j)]

In accordance with 40 CFR 264.99(g), if the Post-Closure Contact determines based on the results of the annual analysis for 40 CFR 264 Appendix IX constituents, that Appendix IX constituents are present in groundwater at any compliance point monitoring well that are not already identified in the permit as monitoring constituents, Textron Lycoming will:

- Re-sample within one month and repeat the Appendix IX analysis. If the second analysis confirms the presence of additional constituents, Textron Lycoming will report the concentration of these additional constituents to the EPA Regional Administrator r and the DEP Commissioner within seven days after receiving the second analysis and add them to the monitoring list.
- If Textron Lycoming elects not to re-sample, the concentrations of these additional constituents will be reported to the EPA Regional Administrator and the DEP Commissioner within 7 days after receipt of the initial analysis and the constituents will be added to the monitoring list.

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In accordance with 40 CFR 264.99(h), if the Post-Closure Contact determines in accordance with 40 CFR 264.99(d) that any concentration limits established under 40 CFR 264.94 are being exceeded at any monitoring well at the compliance point, Textron Lycoming will:

- Notify the EPA Regional Administrator and the DEP Commissioner of this finding in writing within seven days.
- Submit to the EPA Regional Administrator and the DEP Commissioner an application for a permit modification to establish a corrective action program meeting the requirements of 40 CFR 264.100 within 90 days (because an engineering feasibility study for corrective action is submitted herein in Section E-3g). The application-will contain the following information:
	- A detailed description of corrective actions that will achieve compliance with the groundwater protection standard specified in the permit under 40 CFR 264.99(a).

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• A plan for a groundwater monitoring program that will demonstrate the effectiveness of the corrective action.

In lieu of the above procedures, Textron Lycoming may elect to make a demonstration under 40 CFR 264.99(i) if they believe that the statistically significant increase identified for j groundwater monitoring constituents or parameters is either due to a source other than the former surface impoundments, or an error in sampling, analysis, or statistical evaluation or

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natural variation of the data. If Textron Lycoming elects to make such a demonstration, the following actions will be taken:

- EPA Regional Administrator and the DEP Commissioner will be notified within seven days that Textron Lycoming intends to make a demonstration under 40 CFR 264.99(i)
- a report will be submitted within 90 days to the EPA Regional Administrator and DEP Commissioner demonstrating that a source other than the former surface impoundments caused the contamination, or that the apparent contamination resulted from an error in sampling, analysis, or evaluation
- an application for a permit modification will be submitted within 90 days to the EPA Regional Administrator and DEP Commissioner to make any appropriate changes to the compliance monitoring program
- monitoring in accordance with the on-going compliance monitoring program will be continued

If for any reason during the compliance monitoring period it is determined that the detection monitoring program no longer satisfies the requirements of 40 CFR 264.99, an application for a permit modification will be submitted within 90 days to the EPA Regional Administrator and the DEP Commissioner in accordance with 40 CFR 264.99(i) to make any appropriate changes to the monitoring program.

The Post-Closure Contact will be responsible for taking all the necessary actions outlined above in Section E-3f during the post-closure care period. ^

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E-3g Engineering Feasibility Plan for Corrective Action [40 CFR 270.14(c)(7)l

The following Engineering Feasibility Plan for Corrective Action is presented to satisfy the requirement established in 40 CFR 270.14(c)(7) to include such a plan in the RCRA Post-Closure Permit Application'. In accordance with 40 CFR 270.14(c)(7), facilities that are to begin monitoring under the RCRA permit period with a compliance monitoring program in accordance with 40 CFR 264.99 are required to submit an Engineering Feasibility Plan for Corrective Action.

Because the Engineering Feasibility Plan for Corrective Action is to be implemented in response to a hypothetical release case, the completeness of the plan is limited due to the inherent lack of information in the following areas:

- identification of the type of contaminants present (i.e. organic or inorganic, specific gravity less than/ greater than 1.0, etc.)
- identification of specific contaminants involved in the release and their respective physical, chemical, and fate and transport properties
- maximum concentration level of contaminants
- location of contaminants (i.e. monitoring wells affected by release)
- specific permit conditions for the groundwater protection standard including hazardous constituents to be monitored for and corresponding concentration limits

The Engineering Feasibility Plan for Corrective Action is described in Section E-4f(l) through Section E-4f(8). This plan outlines a Corrective Action Program in accordance with 40 CFR 264.100 to be implemented in the event that such a program is required under 40 CFR 264 Subpart F regulations.

E-3g(1) Application for Permit Modification to Establish a Corrective Action Program [40 CFR 264.99(h)]

In the event that concentrations of hazardous constituents are detected above the permitted concentration limits established under 40 CFR 264.94 at the compliance point as described in 40 CFR 264.99(h), the Post-Closure Contact will prepare and submit to the EPA Regional ^ Administrator and the DEP Commissioner an application for a permit modification to establish a Corrective Action Program. This application will include a Corrective Action Plan with a detailed description of the corrective actions to be implemented as described in Section E-3f. An outline of this Corrective Action Plan is presented in the following sections. The Post-Closure Contact will be responsible for preparing any necessary application for permit modification to establish a Corrective Action Program, overseeing the Corrective Action Program, and preparing and submitting any required reports or notifications during implementation of the program.

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E-3g(2) Compliance with the Groundwater Protection Standard [40 CFR 264.100(a)]

The goal of the Corrective Action-Program-will-be-to-attain compliance with-the groundwater protection standard in accordance with 40 CFR 264.100(a). The groundwater protection standard specified in accordance with 40 CFR 264.9 in the RCRA Post-Closure Permit will / include:

- a list of hazardous constituents identified under 40 CFR 264.93
- concentration limits under 40 CFR 264.94 for each of those hazardous constituents
- the applicable compliance point under 40 CFR 264.95
- the applicable compliance period under 40 CFR 264.96

E-3g(3) Identification of Extent of Contamination

Based on the results of monitoring conducted to date, a field investigation will be described in the Corrective Action Plan. This field investigation will be designed to identify the extent of contamination found to be present in the area of the former surface impoundments associated with the detected release to groundwater. In accordance with 40 CFR 264.100(e)(1) and (2), the field investigation will be designed to adequately characterize the extent of any contaminant plume extending between the compliance point and the downgradient property boundary and beyond the facility property boundary where necessary to protect human health and the environment.

The scope of any field investigation will be dependent upon the scope and results of monitoring conducted prior to the application for permit modification described in Section $E-3g(1)$. If the existing data is sufficient to adequately characterize the contaminant plume, the field investigation may have a limited scope, or may not be necessary at all.

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The field investigation will include, as appropriate; additional monitoring wells (additional (monitoring locations qnd/or additional monitoring depths); soil borings; soil, groundwater, and surface water sampling, laboratory analysis, geophysical investigations, or other necessary field investigation measures. All field work will be completed in accordance with the RCRA TEGD as described in Section E-1 through E-3. In accordance with 40 CFR $264.100(e)(2)$, if it is necessary as a part of the field investigation to conduct aspects of the field investigation (i.e., sampling, monitoring well installation, etc.) beyond the property limit, Textron Lycoming will make their best effort to obtain the necessary permission from the third parties involved to conduct these aspects of the field investigation.

E-3g(4) Evaluation and Selection of Remedial Alternatives

Based on the field investigation (see Section E-3g(3)) or other data collected to date, if the concentrations of hazardous constituents identified in any of the environmental media (i.e. soil, groundwater, or surface water) are found to exceed the proposed RCRA Action Levels \langle published in the July 27, 1990 Federal Register or other appropriate site-specific health risk-based levels, the available remedial alternatives will be evaluated.

I , ^I Remedial alternatives will be evaluated based on their:

- ability to achieve compliance with the groundwater protection standard established under 40 CFR 264.92 at the compliance point, and beyond the compliance point as required by 40 CFR 264.100(e)(1) and (2)
- reduction of potential risk to human health and the environment
- *implementability*
- short-term effectiveness
- long-term effectiveness
- cost

Remedial alternatives will be evaluated to remove or treat hazardous constituents in place in all affected environmental media as required to achieve compliance with the groundwater protection standard. Remedial alternatives to be potentially considered would include:

- groundwater recovery and treatment to contain contaminant migration and mitigate levels within the contained zone
- further containment of any hazardous constituents found to be present in the waste management area
- excavation and removal or in-place treatment of contaminated soils in any source areas within the waste management area
- a combination of two or more of the above alternatives
- no action alternative

Based on an evaluation of these or other available remedial alternatives, a remedial alternative will be selected.

E-3g(5) Implementation of Selected Remedial Alternatives

If it is determined that the "no action" remedial alternative is not protective of human health and the environment, the selected remedial alternative will be implemented in accordance with an approved schedule.

E-3g(6) Description of Monitoring Program to Demonstrate the Effectiveness of the Corrective Action Program [40 CFR 264.100(d)]

The monitoring program to be used to demonstrate the, effectiveness of the Corrective Action Program will be a compliance monitoring program as outlined in Section E-3. As described in Section E-3 the specific monitoring system to be used for compliance monitoring will be dependent upon the available data from all monitoring conducted to date. Wells in addition to the current monitoring system (see Section E-2) may be required to adequately monitor any contaminant plume that may exist, depending on where contaminants are detected, what concentrations they are detected at, and what the specific fate and transport characteristics of those contaminants are. The constituents to be monitored for during the Corrective Action Program will be those 40 CFR 264 Appendix IX constituents identified to be present through previous monitoring at the compliance point. Comprehensive Appendix IX screening will not be conducted during the Corrective Action Program. Appendix IX analysis will have

comprehensive Appendix IX monitoring is believed to be adequate to confirm detections for any Appendix IX constituents present, thereby precluding the need for additional comprehensive Appendix IX analysis. E-3g(7) Schedule for Corrective Action Measures [40 CFR 264.100(e)(3)] In accordance with 40 CFR 264.100(e)(3), a schedule will be submitted along with the Corrective Action Plan as a part of the application for permit modification described in E-3g(l). The schedule will include reasonable time periods for the initiation and completion of all corrective action measures. E-3g(8) Termination of Corrective Action Measures [40 CFR 264.100(e)(4)]

In accordance with 40 CFR 264.100(e)(4), the Corrective Action Program described in this Section will be terminated once the concentration of hazardous constituents under 40 CFR 264.93 are reduced to levels below their respective concentration limits specified in the permit under 40 CFR 264.94 or alternate levels established under the Corrective Action Program. After termination of the Corrective Action Program, an appropriate detection monitoring program will be instituted in accordance with 40 CFR 264.98 for the remainder

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already been conducted at that point as a part of the annual Appendix IX screening analyses

that will be conducted during the compliance period proposed in Section E-3. This

of the post-closure period.

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E-3g(9) Reporting and Notification [40 CFR 264.100(g) and (h)]

The Post-Closure Contact will prepare and submit semi-annual reports to the EPA Regional Administrator and the DEP Commissioner describing the effectiveness of the Corrective Action Program.

If it is determined at any time that the Corrective Action Program no longer satisfies the requirements of 40 CFR 264.100, the Post-Closure Contact will submit, within 90 days, an application for a permit modification to make any appropriate changes to the program.

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 $\mathcal{O}(\mathcal{A},\mathcal{C})$, and \mathcal{A} — ∗ซ่ GROUNDWATER WELL #1 DRILLING LOG WELL NUVSER $\frac{1}{\sqrt{1-\frac{1}{1-\$ $A6220/7$ 1014 DEPTH 265 SURFACE ELEVATION $\frac{1}{2}$ DRILLING DRILLING DATE DATE ONPANY ELSI CULLED METHOD ALGER DATE NOTES DRILLER $D. Q$ HELPER $\sum_{i=1}^n$ $106 BY - 21$ CEPTHIFEETS <u>하</u> **DESCRIPTION / SOIL CLASS FICATION** (COLOR, TEXTURE, STRUCTURES) σ -医学 0-3 Dike fill. Tan sand with line of black organic soil. **ALL** 3-10' Black organic soil C. the layers of ___ **n** peat and wood fragmets. ~ 10.4 THE 10.14 grey course grained sand. 准 14-18 gruy redium quend suid. 18-19 medium said and graph. 20 ិដ្ឋិម្ភិ 19-26.5 org redium-course some. (H.S. adr) 囧 25 -. Split spoon suple 75-265' 51 $S.S.$ C=sing 2.0" I.d. PVC pipe 凰 $30¹$ $\begin{picture}(20,20) \put(0,0){\line(1,0){15}} \put(15,0){\line(1,0){15}} \put(15,0){\line(1$ " A S T M. DISEG $SHEET$ OF $H - 6$

فيبت GROUNDWATER WELL #2 DRILLING LOG $\begin{bmatrix} 1 & 1 \\ 1 & 1 \end{bmatrix}$ **TH** $S[11][11]$ SURFACE ELEVATION $\frac{1}{2}$ water level: $\frac{7.34}{2.34}$ DRILLING COMPANY COST CURST METHOD AVGLE DATE E. NOTES DRILLER $\overline{\Delta Q}$ HELPER $10G BY = 20C \pm 0.000$ Θ Jeppy (reel) DE SCRIPTION / SOIL CLASSIFICATION GESFIE **Q** (COLOR, TEXTURE, STRUCTURES) Ω E1 $2-7$ Oike fill, Tan Suid wifines \mathbb{H} E 7-14' Black organic soil with layer of 10 peat and wood frequents. 围 14-26.5 grey medium-coarse grand Scut 選 \Box salit roon semple (26.5). H=s oder. $20 -$ Casing Z.0 O.B. PUC pipe. \Box S creen $15 - 25$ \mathbb{E} S 55 \mathbb{C} \mathfrak{D}^{\vee} F $\left| \cdot \right|$ E_1 ASTM DISSS SHEET ______ OF _ $H - 7$

GROUNDWATER WELL 23 DRILLING LOG S_{II} Strategy CONN. L. $-$ ------- TOTAL DEPTH $-$ 25' SURFACE ELEVATION ______________ WATER LEVEL 6.5 道:1 DRILLING Fast Court DRILLING ALGIE DATE **FIOTES DRILLER** $HELPER$ ត្តិ វុរ្ **IOG BY** SEFTH FLET \mathbf{E} DESCRIPTION / SOIL CLASSIFICATION (COLOR, TEXTURE STRUCTURES) $0 -$ ぼう うくり しんじょう 0'9' fine-course sand and gravel ÈI $\hat{\mathbb{E}}$) $10-$ ा भूर । $9 - 13$ Black organic soil with peat and wead fragments 性質 13-25 hrown medium animed sand with 70 fine sand and silt. Select finagener \mathbb{E} at bottom of spoon surfly. No occr. $\begin{picture}(20,20) \put(0,0){\line(1,0){155}} \put(15,0){\line(1,0){155}} \$ split^t spoon sample Caring 2.0° D.D. PUL Pipe justh $|\vec{E}|$ 10[°] Screen 15-25. $30 \begin{bmatrix} -\frac{1}{2} & \frac{1}{2} \ \frac{1}{2} & \frac{1}{2} \end{bmatrix}$ A STW DISAL SHEET _____ OF _ $\bigcap_{i=1}^{\infty} \mathbf{E}$. $H - 8$

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Split spaon sample 25'27' 糭 罰 تك 新 39-36 - light silty sand with some given \mathbb{E} spht spoon sample 34-36 Z.O" O.A. PUC CESIM with Screen 25-35' 鄞 TASTM DISEE SHEET $\qquad \qquad \text{OF}$ $H - 9$ \mathbf{E}

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18. en % MOVING **LENTH BOTH OF SAMPLE** C claude U **THE W** $\overline{\textbf{r}}$ m. 1004 $5 - 80 - 31$ 19 SM 24 2.0 -28 < 87 \bullet $S:1$ $\overline{\mathcal{L}}$ mL $\overline{\ldots}$ ा <u>بسم</u> 24 12 \mathbf{v}_s , \mathbf{c}_s ・フ・クー فقشك U.L \mathbf{v} $s₂$ '8 $2 - 2$ 74 7-9 S3 \mathbf{r} *፟ጛ*Ѵ҉҉ رہ 24 -6 12 S4 \bullet ړرک 18 24 20.5 **SS** 4 51 24 24 <u>برح</u> $\mathbf{f}^{(1)}$ 25 $2³$ $\overline{\textsf{S}}\textsf{C}$ $.5.8.$ E GROUNDWATER DATA FIELD LOG OF BORING $\overline{\text{err}}$ $\overline{}$ \overline{m} \overline{C} $\overline{1130}$ PODE $\frac{1}{2}$ from $70 - 69$ **In confurtion** ้รม $F_{\alpha}:CF$ \mathcal{L}_{α} 3.5 切 0 ϵ 'O ្ត្រ 3.5 \overline{a} F^{μ} \mathbf{z} 7.il **WORK COMPLETED** ρ_f $\overline{9}$, b m p.a. **WALE** $f^{\prime}_{\texttt{C}}$ \mathbf{m} pa. \mathbf{r} **HH** $\overline{23}$ \cdot ,1 \cdot ist Ľ1 $\boldsymbol{\kappa}$ $\boldsymbol{\kappa}$ Tı $1/1, 3$ $\zeta_{\mathcal{U}}$ ⁄ ک) てっ نمره \overline{a} $-$ " \mathbf{r} P U \mathcal{F}_{1} δ . σ ťť $\mathcal C$ < ه: نه THE DISTRIBUTION 25 λ MOVING ON **DRALING** STAND BY REPAR TOTAL. -178 $\cos 2\theta$ $\ddot{}$ \bullet .

MERALF & EDDY **ENGINEERS** REPORT OF EXPLORATION $merceoc$ B ill <u>Checchi</u> \mathbf{B} -6 HOLE NO. ... ACCT. LOOR. AVCO - LYCOLING DREL CONTINUTOR Welt: ASSOC. Inc. $Accr.m.$ $|569$ DRUDE LOCATION STRATFORD $\mathcal{C}\mathcal{T}.$ THE DOZEE MTO MOSILE B305 ELEVATION_ $50/27$ BEZ & TWE OF CASING FLT. August TO 10.6 (ASIXS) 85 DATE START 23 SEPT 140 o DATE COMPLETE 24 SEPT 85 UnTER. WEATHER $CLOUDY$ TQ^2 $5\rightarrow -272$ DRILLING PLUID SAMPLE DATA **FIELD CLASSIFICATION BOTH OF SAMPLE THE W** ARD **ARD LOWTH** NOVET **MARKET** r nou $\overline{\bullet}$ $2.0|19-60+$ 730 $\overline{14}$ SPT O.4 $5p$ لمعصد $F +$ 51 12 uc_{1} . c_{1} \bullet 6.8 K $6 - 41$ $4.8₁$ 52 24 11 $5f/$ 1.777 53 11.9 $33 - 3.72$ \mathbf{t} 10.6 IL^r 16 **SM** $\overline{\mathsf{S}^{\prime\prime}}$ $3 - 26 - 73$
- 2^{11} IL B 13.0 $5P_{<}$ \mathbf{r} 2^l -12 $P: J:$ $74.2\frac{52.74 - 12}{72}$ S 22.2 $24'$ \cdot \prime TZ 56 $\overline{\mathbf{I}^{\prime}}$ %ે $7 - 5 - 6 - 9$ 28 24 $.5.6$ \mathcal{F} \mathbf{r} Was وتستومية الملطف \sim **AUTO PIELD LOG OF BORING GROUNDWATER DATA** Đ 0.8 Concrete W/reder $$\overline{}$$ TIME \overline{m} **AT COMPLET** 0.8 \overline{z} . fun the face and formed 9.2435 9.35 4,7 7.5 $\overline{\mathbf{z}}$, \mathbf{z} β_0 ulder 7.5 mf fund Tr. Liet of Grand **BORK COMPLETED** $\mathfrak{S}.$ 3 **MILL** 帚 **HATLE** 64. m. ϵ (b) $blkb!$ sizel figure $B = i0$ **BIAL** , ?) \cdot \cdot **ISM** Lan-bir π . β' ~ $||$ \pm 60 ひょくべい ド・ビタン 12'± ل أيضي 572.54 $\overline{\mathbf{u}}$ $\overline{\cdot}$ لرب ببربر کر -بريد لرد $2/$ τ $R' \sim 16'$ 20 W ed TIME DISTRIBUTION Port in Fili- 2it 11/00 <u>20</u> bm DRILLING. 30 but Little recoversie drive. **REPAIRMAL STALD B** <u>saren 1er</u> **TOTAL** 10' Screen Protector Pire MSE NO. $\cancel{2}-6$ Samolec S/K ファインファーブ

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 $3 - 11$ monte B. Checchi HOLE MO. ACCT. ABOR. AVCO-LYCOMUS Come Welti Assoc Inc 1569 ACCT. MO **STERTTOID** CT LOCATION DRILLER Dozer Mtf - Mobilo B305 ELEVATION_ DATE START 26 SEPT 85 1520 HSA DATE COMPLETE Z6 SEPT 85 1700 SIZE & TWPE OF CASING_ N/A WEATHER drizzle 20° ± **DRILLING PLUID. FIELD CLASSIFICATION**
AND
REMARKS SAMPLE DATA **MARLE BEPTH OF SAMPLE LENTH** NOWET **TORY** \blacksquare $P004$ $\overline{\bullet}$ Tai $1 - 4 - 9$ SM 24 ST 14 \overline{z} $S₄$ \bullet oney tor is signed $\overline{12}$ S/M n $9.4 - 7$ 24 8 $S₂$ 6 Ed & black CF So. of 7.12 12.5 S^P \mathcal{L} 12 \mathcal{L} $S₃$ $\overline{}$ \overline{a} $21.3...k$ $\overline{G_{2}}$ $rac{1}{2}$ ╦. $17 - 13$ kΜ 16 13 7^J $\mathcal{Z}_{\mathbf{\Omega}}$ 54 ϵ , $0.b.$ \bullet $\overline{1}$ **GROUNDWATER DATA** FIELD LOG OF BORING \overline{r} \overline{m} $\overline{\mathbf{m}}$ $\overline{}$ \int a..o' $\overline{\mathbf{3}}$ $tan M²$ \mathcal{L} O $\overline{3,5}$ $9 - 2895$ **AT COUPLETION** ククコ μ , \rightarrow $\mathcal{L}_{\mathcal{A}}$ $\mathcal R$ Gre. $\boldsymbol{\kappa}$ $Gerf.$ CF send Lit /sprea ノ乙 $Tr1LiTSI$ 20 Obranel WORK COMPLETED **HANCE BA HILL** $\frac{10}{100}$ \mathbf{m} m. $\overline{}$ TIME DISTRIBUTION . MOVING ON. DRILLING. STAND BY... REPARTING. TOTAL. M т. $m\overline{B}$

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ENGINEERS REPORT OF EXPLORATION $\overline{}$ 3.11 Check 2.12 HOLE NO. **INSPECT** AICI FLYCOMING \hbar soc \hbar In. ACCT. ABOR.. Wett: $ISU7$ DRILL COMPRACTOR ACCT. NO., STRATTORD σ . LOCATION. DRILLER Mobile $B-30s$ λ ar Mto. ELEVATION. DATE START_23 SCPT. 85 11 o o Q, D DATE COMPLETE 23 52PT. 85 1300 I.D. 602 WEATHER CLOUDLE <u>Nove</u> DRILL SIGS PLUID. **FIELD CLASSIFICATION** SAMPLE DATA **AND** -
RESISTANCE
BLOVEA IL **BOTH OF SAMPLE LENTR MONEY** $\frac{1}{2}$ \blacksquare \bullet $\overline{\bullet}$ 7800 $n:$ \overline{G} -sr $22 - 59 - 60$ $24''$ $\boldsymbol{\iota}^{\boldsymbol{\mathsf{\mu}}}$ 5_M 51 $2,0$ \boldsymbol{c} \overline{M} $10 - 9 - 8 - 8$ $14"$ $5¹$ \bullet $5.$ 3.5 $.52$ 11 ه د 513.302 and \overline{p} $3 - 4 - 6 - 12$ 53 9 SM 18 \bullet **CALL** $\overline{9}$ L^{2n} \cdot **SJI.** 54 ٠. $12.513 - 2.2.3$ 10,1 $\overline{\mathfrak{r}t}/$ <u>مرو</u> \bullet $5₅$ 17 \bullet 2-2-4-5 וגו וו fť o B 12.1 2 - 7 - 12 - 13 56 ø 10.1 $\overline{\mathcal{F}_{\mathcal{L}^{\mathfrak{p}}}_{\mathbf{r}}}$., . . 13.22 12 \mathbf{u} 52 23 H 21 $\overline{\cdot}$ $35 - 35$ \overline{L} $\begin{array}{c} \bullet & \bullet & \bullet \\ \bullet & \bullet & \bullet \end{array}$ -33 \mathbf{r} $< r$ 58 $\overline{}$ 26.S 24.1 てねょく F. Gronal Enn. $12'$.n:E $F1 - 43 - 33$ $5P$ \cdot μ 30 S9 \mathbf{g} t 2.3 mee e مصنعته $E.$ 1.51 GROUNDWATER DATA **MOTHER** FIELD LOG OF BORING \bullet . TIME $\overline{\text{corr}}$ $\overline{\mathbf{m}}$ *0.3* Bit. Conc. Provence O 9.}}}5 **AT COMPLETION** Said to follow the \mathcal{L} o 0.31 Ta^{-1} يمنع 7_{11} $\overline{1}$ $\overline{1}$ \sim 4 re., $\mathbf{1.0}$ km \ddotsc \mathcal{N} ✔ C أسمعن \cdot , \cdot **WORK COMPLETED** 14 HERE \mathbf{m} 罷 **PRT** ma. LR.UN τ . There can \mathcal{H} حطا 19.3 AA trace $P_{\rm max}$ F مبرمي $F'.f$ و ... \bullet \mathbf{r} 19.3 یہ د ļ., t^4 $\overline{}$ 30 \bullet ٠. f `U THIE DISTRIBUTION Δ MOVING ON \bullet **DRX 1, 1940** STAND B 22.91 kerist **TOTAL** HOLE NO. $\frac{1}{2}$

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 $\overline{B-13}$ Chechi $B:U$ HOLE NO. **BUSINESS TOOL** $\sqrt{20-2400M1NG}$ DRU CONTRACTOR WELTI ASSOC. IUC. ACCT. ABOR. 1569 ACCT. NO. STRATFORD, σ LOCATION M_{\odot} \odot 10.505 COME ROZER Mm ELEVATION. DATE START 25 58.07 \mathbf{s} 160 O SIZE & TWPE OF CASING HSA 7000 DATE COMPLETERS 85 Sept \dot{N}/\dot{N} CLEAR 80 \sim \sim \sim **WEATHER** DRELENS FLUID. SAMPLE BAZA-1 **FIELD CLASSIFICATION AND**
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In an an **LENITH**
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Historia FROM $\overline{\bullet}$ Elle Granell, Mr. Jan $20 - 25 - 15$ 74. /2'' **SM** $\overline{\mathcal{S}^{\,\prime}}$ SPI 2 24 \boldsymbol{c} 57 T 2 43 $18 - 100$ SM 9 EL S $\overline{\mathbf{r}}$ $S₂$ $3,6$ فتتب $1.512c$ Sant W/Sq. Fin Ani $\frac{20 - 14.11}{2}$ CF $\overline{\mathsf{S3}}$ 24 $5M$ \mathbf{H} 7,2 9.2 Pm. (Clt wee) CF faith $\boldsymbol{\mathcal{L}}\boldsymbol{\mathcal{F}}$ $\frac{77.78.23}{24}$ $54₀$ 3Y $\mathcal{L}_{\mathcal{F}}$ 10.B 12.8 $\boldsymbol{\mu}$ 24 π C_{11} , C_{2} 77 \overline{B} ra 14.4 そク・とろ موبك 55 14 14 \mathbf{r} フレ -24 $20 - 19.23$ 7. **SHKI** 18 24 χ 2σ $O.E.$ E, GROUNDWATER DATA FIELD LOG OF BORING \overline{r} **MOTOR DATE** $-$ Let Gravelle Z. bonne 9, a 0 725.97 AT COMPLETION 17.19 4.5 m_f faul λ $FC.$ 5.7 **WORK COMPLETED** $T = 54$ Lit . 8.7 $\mathcal{L}\mathcal{F}$ $S_{\alpha n}$ 雜 **HUPLE MA** $\frac{1}{100}$ m. $7₀$ \overline{O} $\overline{}$ lo an Λ THE DISTRIBUTION MOVING ON. **DRSLLE STAND BY_ KEPAMINA** سيته **TOTAL** $rac{1}{2}$ $rac{1}{2}$ $rac{1}{2}$ $rac{1}{2}$

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ENVIRONMENTAL SCIENCE & ENGINEERING, INC. (Page __ of _)

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Appendix E-2

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Summary of Detected Constituents from Interim Status Groundwater Data November 1981 - October 1989

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Notes: * All values are in ug/l unless noted otherwise , , . , U Indicates eleinent was analyzed for but not detected. The number shown is the detection limit.

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WELL MW-1S GROUNOUATER MOMITORIHC AMALtTICAL OATA TEXTROH-LtCOHIMC, STRATFORD, CONHECTICUT

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Notes: * All values are In ug/l unless noted otherwise

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GROUNDWATER MONITORING ANALYTICAL DATA TEXTRON-LYCOMING, STRATFORD, CONNECTICUT
Aligust. 1983 - APRIL. 1986

 $\sum_{i=1}^{n}$

Notes: * All values are in ug/l unless noted otherwise U Indicates element was analyzed for but not detected. The number shown is the detection limit.

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WELL 2 GROUNDWATER MONITORING ANALYTICAL DATA TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

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April. 1985 - September, 1987

Hotes: * All values are in ug/l unless noted otherwise

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U Indicates element was analyzed for but not detected. The number shown is the detection limit.

WELL MW-2 CROUNOWATER H0MIT0RIN6 ANALYTICAL DATA TEXTRON-LYCOMIMG. STRATFORD, COMMECTICUT December, 1987 - Present

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Kotes: • All values are In ug/l unless noted otherwise U Indicates element was analyted for but not detected. The nunber shown Is the detection limit.

'VELL 3 GROUNOWATER HOMITORING ANALYTICAL DATA TEXTRON-LYCOMING. STRATFORD, CONNECTICUT AUGOsT, 1983 • APRIL, 1986

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Notes: • All values are In ug/l unless noted otherwise

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WELL MW-3S GROUNDWATER MONITORING ANALYTICAL DATA TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

December, 1987 - Present

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Notes: * All values are in ug/l unless noted otherwise

U Indicates element was analyzed for but not detected. The number shown is the detection limit.

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GROUNDWATER MONITORING ANALYTICAL DATA

TEXTROM-LYCOMING. STRATFORD, CONNECTICUT

December, 1987 - Present († 1987)
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Notes: * All values are in ug/l unless noted otherwise

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GROUNOWATER MONITORING ANALYTICAL DATA TEXTRON-LYCOMINC, STRATFORD, CONNECTICUT

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Notes: * All values are in ug/l unless noted otherwise
U Indicates element was analyzed for but not detected. The number shown is the detection limit.

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December, 1987 - Present

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AUGUST, 1983 - APRIL, 1986

* All values are in ug/l unless noted otherwise

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WELL 5 CROUNOUATER MOMITORINO AMALTTICAL DATA TEXTROM-LYCOMING, STRATFORD, CONNECTICUT
April, 1985 - September, 1987

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WELL MU-50 CROUMOWATER HONITORIHO ANALYTICAL DATA TEXTROM-LtCOMING, STRATFORD, CONNECTICUT

Decenber, 1987 - Present

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Notes: * All values are in ug/l unless noted otherwise
U Indicates element was analyzed for but not detected. The number shown is the detection limit.

GROUNDWATER MONITORING ANALYTICAL DATA

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TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

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Notes: * All values are in ug/l unless noted otherwise

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WELL MV-6 GROUNDWATER MONITORING ANALYTICAL DATA TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

December, 1987 - Present

Notes: * All values are in ug/l unless noted otherwise

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GROUNOWATER HONITORING ANALYTICAL DATA

TEXTROM-LYCOMIHC, STRATFORD, CONNECTICUT

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WELL 7 CROUNDWATER MGMITORIHG ANALYTICAL DATA TEXTROM-LYCOMING. STRATFORD, CONNECTICUT

April, 1985 - September, 1987

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WELL MW-7 GROUNDUATER HOHITORIMG ANALYTICAL DATA TEXTRON-LYCOMINO, STRATFORD, CONNECTICUT December, 1987 - Present

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Notes: • All values are In ug/l unless noted otherwise

WELL $8 \sim$ CROUNDUATER MOMITORIHO AMALYTICAL DATA TEXTRON-LtCOHIHG, STRATFORD, COMMECTICUT

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Notes: * All values are In ug/l unless noted otherwise

WELL 9 CROUMDUATER MOHITORINO ANALYTICAL DATA TEXTRON-LtCOHINC, STRATfORO, COHMECTICUT

April, 1985 - September, 1987

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Notes: * All values are in ug/l unless noted otherwise

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WELL 10 GROUNOUATER HOHITORIMG ANALYTICAL DATA TEXTROM-LYCOMING, STRATFORD, CONNECTICUT
April, 1985 - September, 1987

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Notes: * All values are In ug/l unless noted otherwise

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WELL 11 GROUNDWATER MONITORING ANALYTICAL DATA TEXTRON-LYCOMING, STRATFORD, CONNECTICUT April, 1985 - September, 1987

Sep-87 **Jul-87** $Jan-87$ $Ar-87$ **Jun-86** $0ct - 86$ $Ar-B6$ Aug-85 $Nov-85$ Apr -85 $\mathbf{1}$ 10_U **HA** 1_u **NA NA** 1 **NA NA NA** chloroform (THM) **NA** 1 1^U 10_U **NA NA** 49 **NA NA** NA 1.2-dichloroethane (EDC) 1^U **NA** -1 10_u **NA NA** 6 **NA NA NA** dichloromethane 1_u **NA** 10_u **NA** $\overline{\mathbf{3}}$ **NA NA NA NA** 1,1,1,2-tetrachloroethane **NA** 1_u **NA** 1_u **NA** 10 **NA NA HA** tetrachloroethene 1_u **NA NA** 10_U **NA NA** $\mathbf{1}$ **NA NA** 1.1.1-trichloroethane **NA** $\mathbf{1}$ 1_u $13₁$ **NA** 21 **NA NA NA NA** trichloroethene **NA** \bullet 1_u **NA** 1^u $\ddot{ }$ **NA NA NA NA** ethylbenzene $\mathbf{1}$ **NA** 1_U **NA** 1_U 42 **NA NA NA NA** toluene $\mathbf{1}$ 1^U **NA NA** ่ 1 บ **NA** 14 **NA NA NA** 20 xylenes 20_u 20 U 20_u 20 20 10_U 10_U **NA NA** 20 Chromium (Total) 40 20_u 80 20_u 300 20 20 **NA NA NA** Copper **NA** 11,500 60 **NA NA NA NA NA NA Iron** 1,270 **NA NA NA** 1,660 **NA NA NA NA NA** 0.2 Hanganese 0.2_U 0.2_u 0.2_u $\overline{2}$ 1_U 2_u 2_u **NA NA Mercury** 20_u 20_u 20 30 30 34 40 30 NA. **NA** 20 Nickel 160 170 100 180 180 150 550 **NA NA** Zinc 67.1 $\mathbf{2}$ 13.1 $\overline{\mathbf{3}}$ 15_u 24 **NA NA NA NA** Total Organic Halogens (TOX) 72.6 14.2 $\overline{\mathbf{3}}$ $\mathbf{2}$ 15_u **NA** 28 **NA NA NA** Total Organic Halogens (TOX) 14.0 80.3 $\mathbf{3}$ 15_U \blacktriangle **NA NA NA NA NA** Total Organic Halogens (TOX) 14.6 65.0 \blacktriangle 15_u -5 **NA NA NA NA NA** Total Organic Halogens (TOX) 6,500 14,000 21,900 13,700 1,500 12,000 **NA NA NA NA** Total Organic Carbon (TOC) 12,900 14,700 18,400 21,900 1,700 **NA NA NA NA NA** Total Organic Carbon (TOC) 16,000 13,100 22,700 19,200 **NA** 1,900 **NA NA** NA **NA** Total Organic Carbon (TOC) 12,200 26,900 21,900 18,700 2,000 **NA NA NA NA NA** Total Organic Carbon (TOC) 251 294 228 125 248 239 160 **NA** 1,000 **NA** Specific Conductance (umhos/cm) 256 299 241 130 240 145 258 650 **NA NA** Specific Conductance (unhos/cm) 6.12 5.34 5.16 5.38 5.60 5.40 7.10 **NA** 7.70 **NA** pH 5.32 6.17 5.21 5.48 5.60 5.40 7.00 7.10 **NA NA** pH 5.32 6.13 5.22 5.48 5.60 7.70 7.20 5.50 **NA NA** pH 6.20 5.23 5.49 5.33 5.80 7.30 5.50 **NA** 7.70 **NA** рH 10_U **NA NA NA** 6 **NA NA NA NA NA** phenol **NA NA NA** 28,100 34,600 НA **NA NA NA NA** Sulfate (SO4) **NA NA NA NA** 42,000 **XA NA NA NA NA** Chloride **NA NA NA** 38,600 38,000

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Notes: * All values are in ug/l unless noted otherwise

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CROUNDWATER HOMJTORIMB ANALYTICAL DATA TEXTROM-LYCOHIHG, STRATFORD, CONNECTICUT Decenber, 1987 - Present $\left\langle \right\rangle$ Mar-88 Aug-68 Nov88 Feb-69 Apr-69 Jul-89 Oct-89 Dec-87 NA NA NA ³⁰⁰ NA NA NA NA Hanganese NA 20 0 20 U 20 U 20 U 20 U 20 U 50 Nickel NA 20 U 20 U 20 U ⁶⁰ 20 U ³⁰ 20 U Zinc NA 3.6 16.9 22.3 33.6 7.5 37.7 9.3 Total Organic Halogens (TOX) NA 6.6 17-5 35.4 31.1 6.4 36.2 a.a Total Organic Halogens (TOX) NA 6.4 15.6 32.6 35.0 7.0 29.9 Total Organic Halogens (TOX) 9.7 NA 6.6 17.1 29.9 32.4 7.9 32.4 $.7.8$ Total Organic Halogens (TOX) NA 6.300 7.260 11.750 16.240 6.610 25.060 13.600 Total Organic Carbon (TOG) NA 6.500 7.430 11.490 19.120 6.440 25.390 13.400 Total Organic Carbon (TOC) NA '6.600 7,460 11.620 16.160 6.730 26.210 13.200 Total Organic Carbon (TOC) NA 6.900 6.190 11.540 17.560 6,550 26.950 Total Organic Carbon (TOC) 13.000 HA ¹⁶⁰ ¹⁴⁶ ¹²⁵ ¹²⁵ ¹⁶⁷ ¹⁴⁶ Specific Conductance (unhos/cm) 174 NA ¹⁶⁶ ¹³⁸ ¹²⁰ ¹²⁷ ¹⁷⁸ ¹⁵⁰ 174 Specific Conductance (urhos/cm) NA 5.36 6.54 6.54 5.99 6.33 6.59 5.42 PH NA 5.10 6.59 6.53 6.05 6.19 6.60 5.44 PH NA 4.99 6.55 6.55 6.01 6.29 6.60 5.46 pH NA 5.00 6.55 6.52 6.01 6.34 6.61 5.42 pH NA NA NA 26.800 NA NA NA NA Sulfate (S04) NA NA NA 16.600 NA NA NA NA Chloride Sodiun NA NA NA NA 19.290 NA NA NA BsaaB3SsaBXxsK«s

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Notes: * All values are in ug/l unless noted otherwise

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GROUNOWATER HOMITORIMG ANALYTICAL DATA

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Notes: • All values are in ug/l unless noted otherwise

WELL 13 GROUNDWATER MONITORING ANALYTICAL DATA TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

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Notes: * All values are in ug/l unless noted otherwise

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GROUHDWATER MOMITORIMO ANALYTICAL DATA

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Appendix E-3

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DEP Correspondence Regarding
Assessment Monitoring

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MEMORANDUM

TO: GWM File: AVCO Lycomjmg Textron: Stratford

FR: Mark Bamberger, Environmental Analyst, RCRA GW Group

DT: 11 August, 1989 ' ²

RE: CME Summary

A Comprehensive Groundwater Monitoring Evaluation (CME) was conducted on the AVCO Lycoming plant at 550 Main Street, Stratford, Connecticut (CTD 001181502). This included a site visit on 21 July, 1989 to observe groundwater sampling. The objectives of this CME were to fully evaluate the implementation of the assessment monitoring program, and also to evaluate the post- closure,
post-assessment groundwater program. The last CME was conducted in 1986 post-assessment groundwater program. The last CME was conducted in 1986 (CTDEP: Ken Feathers). AVCO's consulting firm is Environmental Monitoring Laboratories (EML) who do both the sampling and lab analyses at the site. The Grovindwater Monitoring Assessment Plan, which included the Sampling and Analysis Plan, was prepared by Metcalf & Eddy, Inc.

Background/Source

AVCO manufactures gas turbine engines used in tanks, aircraft and helicopters. The facility is owned by the Federal Government (U.S. Army) and operated by a contractor, (AVCO). AVCO is bordered on the north by industrial buildings, on the east by the Housatonic River, on the south by a marsh formerly used as a landfill area and currently with housing under construction, and to the west by Bridgeport Airport. Hazardous wastes are handled in the following areas;

The NPDES-permitted wastewater treatment plant is located to the south of the plant area. Currently metal finishing wastewaters from the plant discharges to a flow equilization tank. Cyanide destruction occurs on-site in the plant itself. After hexavalent chrome reduction, NaOH is used to adjust pH and precipitate metal hydroxides. The settled precipitate is dewatered in filter presses and shipped off-site for disposal (Stablex, Quebec, Canada). The supernatant liquid is discharged to a nearby tidal ditch.

Of primary interest in this evaluation are the four closing RCRA-regulated units located to the south-southeast of the AVCO plant which were used prior to installation of the current system. The four units consisted of one flow equalization lagoon, reportedly bentonite-lined and three unlined sludge drying lagoons. The former lagoon received untreated plant wastewater, while latter lagoons were used to dewater the residual sludge.

History of Groundwater Monitoring at AVCO

There are currently thirteen (13) groundwater monitoring wells at the AVCO facility, installed on three different occasions:

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Wells 1, 2, 3 and 5 were used as downgradient, "point of compliance" wells in initial detection- and subsequent assessment-mode monitoring. delineation was made based on their locations adjacent to sludge and 1 equilization lagoons. Wells 6 and 7 served as background groundwater quality sapling points based on an assumed, and later data-supported, southeast groundwater flow direction. Wells 8 through 13 were later emplaced for requested data control.

As a result of the FY86 CME inspection, an order was issued requiring initiation of a groundwater monitoring assessment program at the site $(3/87)$. This enforcement action was based on the detected presence of metals, the unlined nature of the three sludge drying lagoons, and uncertainties regarding
tidal and mounding influences. The primary objectives of groundwater tidal and mounding influences. The primary objectives of groundwater in j monitoring at AVCO were to detennine the extent of all hazardous waste ; > constituents in the uppermost aquifer leaking from AVCO surface impoundments and to estimate the rate of migration of those constituents in groundwater.

Synopsis of. Recent Enforcement History

- 09/25/86 HM-358-calling for an Assessment Monitoring Plan describing; site hydrogeology, future investigations. Sampling and Analysis plan, recommendations for upgrading existing groundwater monitoring wells, and an Implementation Schedule.
- 11/26/86 HM-358 modified-fixing compliance dates -steps have been taken toward clearing this Order: study these results have been submitted and are currently being reviewed by the CTDEP.
	- NOTE: Steps A and B of- this Order have been satisfied although no approval letter for Step B has been received.

• Hydrogeologtc Synopsis

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Thirteen groundwater monitoring and eleven soil boring cores have yielded the following evaluation;

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The AVCO facility is underlain by glacial stratified drift deposits. The uppermost 5 to 15 feet of soil consist of fine to coarse sand with a trace of silt, silty sand, or fill, which is typically sand and gravel with varying
amounts of silt. Laboratory grain size analyses estimate the hydraulic
permeability of this unit at 1 x 10 to 1 x 10 cm/sec. These are
underlain by feet in thickness). Hydraulic conductivity through laboratory testing is gauged at 1 X 10⁻⁴cm/sec yet these data need to be field-supported. Depth to the top of the peat layer ranged between 6 and 17 feet beneath existing ground surface. There are no boring data from the base of the peat and from between peat and bedrock units. This is interpreted by the CTDEP as a data gap indicating the need for further delineation. Bedrock was not encountered in any of the borings. Previous mapping of the area interprets the bedrock at a depth of greater than 120 feet in this area.

The facility and associated lagoons are located in relatively flat area
near the mouth of the Housatonic River, with ground surface elevations near the mouth of the Housatonic River, with ground surface ensures the mouth of the state and generally lower than 10 feet MSL. The water table is also quite flat, the marshy areas with tidal channels exist in the vicinity of the site. Under non-mounding conditions, groundwater in the shallow part of the aquifer in the vicinity of the lagoons would be expected to flow primarily soudheaseward toward the tidal ditch or eastward toward the river. The analysis of vertical and horizontal gradients on-site has been complicated by extensive
anthropologic development of the area. Though vertical gradients are anthropologic development of the area. Inough vertical gradients the \sim interpreted as generally upward toward southeastern discharge into the theories Hovisatonic River, horizontal gradients are far less understood (examined only by generalized computer modeling relying upon regional data).

yater Quality ^

The AVCO facility is situated in a GB area. Flow is generally south easterly into the Housatonic River. There are no specifically impacted receptors, but contamination contributes to overall degradation of the Housatonic River itself, and subsequently Long Island Sound. Samples taken from wells on the AVCO site have historically been above the State Drinking Water Standard in Zn, Ni, Cu, Cr(hexavalent), Cr(total), and CN, as well as 1,1 dichloroe thane, 1,1 Dichloroethylene, trans-l,2-Dichloroethylene, Vinyl Chloride and tetrachloroethylene (PCE).

Current Activities

As of 10 March, 1989, the two surface impoundment areas were in final stages of closure. They had been backfilled and graded. The equilization basin had topsoil installed and was seeded in the fall. This area was then reseeded this spring and along with final grades, appeared reasonable. A drainage swale extends over part of the lagoon cover to facilitate control. Due to regrading activities associated with closure, parts of the lagoon cap and also the equilization basin cap may be at risk from storm-tide flooding. Increased drainage management including additional drainage swale berms and an outflow culvert with a one-way valve, are being considered by AVCO, although no formal proposal has yet been made.

Wells 1, 2, 3, and 5 were damaged during closure procedures. Therefore,
AVCO and the CTDEP have agreed, as a condition on approval to the Closure/ Post-Closure plan $(4/5/88)$, to replace wells 1, 3 and 5 as shallow (water table)/deeper well nest networks. The deeper emplacements are to be into a peat-layer⁻¹ and appear sufficient to gauge the vertical component o Wells 1, 2, 3, and 5 were damaged during closure procedures. Therefore,
AVCO and the CTDEP have agreed, as a condition on approval to the Closure/
Post-Closure plan (4/5/88), to replace wells 1, 3 and 5 as shallow (water
t Chree-dimensional flow.

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Analysis of Current Monitoring Program

The primary recent reports on file at the DEP are;

- a) Groundwater Monitoring Program (2: $3/25/87$ & $5/22/87$, Metcalf & Eddy, Inc.) a) Groundwater Monitoring Program (2: 3/25/87 & 5/22/87, Metcalf & Eddy,

Inc.)

b) Surface Impoundment Closure Plan (9/87, Metcalf & Eddy, Inc.)

c) Groundwater Monitoring Quarterly and Annual Reports (EML).
- b) Surface Impoundment Closure Plan (9/87, Hetcalf & Eddy, Inc.)
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The geological characterization of the AVCO/Stratford area, specifically Including stratigraphic and hydrologic treatments, is deemed satisfactory to set a framework for delineation of three-dimensional contaminant migration is a semi-dimensional emanating from the AVCO facility. Although more data are needed to document mounding and tidal influences in groundwater flow direction, a more complete interpretation is forthcoming in light of recent well emplacements following closure construction. Furthermore, with impoundment closure, mounding effects appear no longer significant. These newly emplaced wells should complement the pre-existing groundwater monitoring system and should facilitate more complete data collection, interpretation and presentation in the name of examination of three-dimensional contaminant flow.

AVCO is working within the enforcement framework prescribed to update their groundwater monitoring network to more comprehensively determine the rate, extent and degree of contaminant flow. There is a need however for greater
examination of the transport mechanism for contaminant flow at this site. Specifically, high resolution of groundwater flow direction and detailed Stratigraphic influence need further study.

The Sampling and Analysis Plan, as included in Section VII of the Groundwater Monitoring Program (3/87) is deemed satisfactory in all necessary areas, consistent with EPA guidance.

A number of data gaps in the assessment program for the AVCO site, as presented by Metcalf & Eddy, Inc., have also been identified. None of these points are deemed critical, yet they should be addressed, in future phase of groundwater monitoring. They are the following;

a) The lack of detailed data collection, with subsequent interpretation as to the effect the peat layer has on contaminant migration, as well as eH and pH readings. Soil borings and well placements into the basal peat unit is indicated.

- b) The lack of interpretation as to the relative and composite influences of diverse site-specific controls on groundwater flow and
contained pigration. Such overlapping composite effects may contaminant migration. Such overlapping composite effects include; discharges to the tidal inlet, the effect of large paved areas, tidal surge effects and the effect of a potential "buried channel" running north-south beneath the site.
- c) The lack of interpretation relating groundwater sampling to potential backflow sampling of NPDES effluent at the tidal inlet due to seasonal or tidal flow surges.
- d) The lack of borings between peat and bedrock layer, making interpretation of the lower extent of flow difficult.

Routine periodic monitoring conducted at the facility is technically deficient in that there is disregard, on a regular basis, for sampling (specifically the important data points at wells 1, 2, 3, and 5), although explanations are given each quarter.

Field Observations

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Field observations of quarterly sampling at AVCO took place between 9a.m. and 2:30p.m. on 21 July, 1989 by Mark J. Bamberger of the CTDEP. Also present were John Fleming (AVCO), Andrew Burke (EML) and John Cronin (EML).

A dichotomy exists between the Sampling and Analysis Plan, submitted by Metcalf & Eddy and the past quarterly and annual groundwater monitoring reports. Yet, although different in detail, the sampling protocol used by EML is consistent with EPA guidance.

An exit interview was conducted between CTDEP and EML personnel prior to sampling completion and the following points were addressed;

- a) no protective equipment, especially gloves, were used during sampling, which may provide a minor conduit for cross-contamination.
- b) the depth/specific conductivity probe used was not decontaminated between wells.
- c) bailers used for evacuation and subsequent sampling are lowered down well hole too rapidly, potentially liberating volatile constituents of samples. ^
- d) the newly installed well *1D was severly out-of-plumb, was therefore not sampled, and needs immediate repair.

e) Che pH neter used in Che field was placed in the purge water between several well samplings, instead of its proper placement in buffer solution or deionized water.

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f) even though EML does both field sampling and analysis, chain of custody protocol, especially relating to labels and protective seals, should be completed.

Post-Closure Groundwater Monitoring

After the four AVCO surface impoundments are successfully closed, a post-closure groundwater monitoring program is proposed to evaluate any future outflow of contamination for a 30-year period, pursuant to Federal Regulations, UO CFR 265.210 and Part 265.310.

Technically, this program will consist of sampling and testing of the existing well network, maintenance of these wells, along with cap and security system and newly-planted vegetative cover. This proposal, as described in the Surface Impoundments Closure Plan, appears satisfactory and satisfying of Federal and State Regulations. Interpretations made during this period should focus on evaluation of the monitoring network adequacy toward determining three-dimensional contaminant distribution and temporal changes thereof.

Reporting and Record Keening

The reporting and record keeping procedures at AVCO are deemed adequate, yet a significant dichotomy exists between the proposed monitoring/sampling protocol of Metcalf & Eddy, Inc. and EML's reporting in quarterly and annual reports.

Timeliness

Sampling and subsequent quarterly/annual report submittal have been conducted in a timely and efficient manner over the past three years.

Content

Quarterly and Annual reports have followed required formats for monitoring reports per Connecticut Regulations. Yet, in content, they are deficient in the areas mentioned previously, specifically relating to upgradient and downgradient well delineation and quarterly re-evaluation of contouring, and interpretation of results to depict a complete picture of three-dimensional contaminant flow.

The annual reports submitted to date do not present enough data to fully document rate and extent of contaminant migration, and concentration of hazardous waste constituents.

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CONCLUSIONS

In general terms, AVCO has presented a sufficient information package to the CTDEP for evaluation of the contamination problems associated with their facility. Their proposals, as presented by Ketcalf & Eddy Inc. have defined well the techniques and technology needed to adequately document the rate and extent of contamination and concentration of the constituents. On the other hand, the field sampling, testing and interpretation, done by EHL, does not reflect the detail promised, by inference, in aforementioned proposals. There appears to be a lack of verbal' and written communication between these two consulting firms, therefore yielding results which do not closely mirror expectations.

This evaluation was carried out within the timeframe of AVCO's overall groundwater assessment program. To this point, the CTDEP finds that adequate progress has been made by AVCO toward returning into compliance with State and Federal Regulations. It is recommended that progress be continued and that a proposal for further and phase study be prepared toward complete compliance.

Violations/Recommended Response

Response

A single letter should suffice to achieve equality between proposed plan and actual field/analytical work done at AVCO. Incompleteness of the assessment determination can ,be addressed by review and comment under Step C of Order HM-358.

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21 September, 1989

 $\texttt{Dr. John S. Fleming} \begin{array}{l} \begin{array}{c} \texttt{Drr. John S.} \end{array} \end{array}$ Chief Environmental Compliance Engineer $\begin{bmatrix} 1 & 1 \end{bmatrix}$ Textron Lycoming 550 Main St. Stratford, CT 06497-2452 -

RE: CME Findings

Dear Mr. Fleming,

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A Comprehensive Groundwater Monitoring Evaluation (CME) was was finalized on 11 August, 1989 at Textron Lycoming (AVCO) by the Connecticut Department -of Environmental Protection (CTDEP) . The CME was performed to evaluate the implementation of the assessment monitoring program, as well as the post-closure, post-assessment groundwater program.

Enclosed please -find the final CTDEP memorandum summarizing the findings of this evaluation.

- Generally speaking, the CTDEP feels that AVCO has made progress toward characterizing the rate and extent of contamination on—site, pursuant to federal regulations (40 CFR, Subpart F).
- — Though progress is being made within the framework of the•groundwater assessment program, deficiencies in the areas of conceptual evaluation and program execution have been noted and must be addressed in the requested submittal and future quarterly sampling practices (refer to pages 5-7 of attached memo):
	- * conceptual- the assessment program must more fully address evaluation of: a) the hydrogeologic and hydrochemical role of the peat layer, b) hydrochemical effects of the potential for NPDES discharge (tidally- induced) backflow, c) mounding effects (formerly with respect to the lagoon, currently associated with the "sand channel") , and d) hydrogeologic impacts of the landfill cap.

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AVCO CME Findings Page Two

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* execution- a) AVCO must resolve the discrepancy between the documented Groundwater Monitoring Program (dated 3/87) and the executed groundwater monitoring program and b) AVCO must ensure adequate field practices and well maintenance are implemented [specifically relating to decontamination and bailer sampling procedures, well integrity (well #1D), and chain-of-custody protocol].

Please submit to the CTDEP within thirty (30) days of receipt of this letter, a response indicating how you will address the above-noted deficiencies and violations. If appropriate, you may also include within this response a proposal and schedule for developing detailed study plans for further phased investigations of these concerns. This submittal may be considered a supplement to the material previously submitted under Order HM-358 (modified) to achieve full compliance with the order's requirements.

If there are further questions, feel free to contact me at (203) 566-1847.

Sincerely, :> мđ Bamberger \

Environmental `Analyst RCRA Groundwater Section Hazardous Materials Management Unit

Send Certified Return Receipt Requested

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cc: Donna Ashford, AVCO Mike Nosenzo, AVCO Andrew Burke, Environmental Monitoring Laboratories

Environmental Science & Engineering, Inc.

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April 4, 1990

Textron Lycoming 550 Main Street Stratford, Connecticut 06497-2452

Attn: Dr. John S. Fleming Chief Environmental Compliance Engineer /

subject: Proposal to Address CT-DEP Conceptual Concerns Additional Professional Services to P.O. YK99452 F.SE Proposal #90-2132-90

Dear Dr. Fleming:

Environmental Science' and Engineering, Inc. (ESE) is pleased to present this proposal to evaluate conceptual issues . related to implementation of the CT-DEP-Approved Ground Water Monitoring Program. This proposal is specifically targeted
to address comments documented in a September 21, 1989 letter from Mr. Mark Bamberger of CT-DEP and discussed in subsequent
meetings with Textron and CT-DEP on January 29 and March 16, 1990.

The conceptual issues raised by CT-DEP include the following:

- Evaluation of the hydrogeological and hydrochemical role of the peat layer
- . Evaluation of the potential for tidal-induced flow in the surficial aquifer
- Evaluation of the cause for ground water mounding in the "sand channel"
- the "sand channel" ^ Evaluation of hydrogeologic impacts of the landriii cap.

To address these issues, ESE is prepared to offer the professional services described below:

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Task 1 Complete Review and Analysis of Existing Analytical Data

ESE is currently in the process of reviewing and analyzing all existing data. This review essentially consists of a compilation of all analytical data for the period of record into a standardized Lotus 1-2-3 spreadsheet. A draft output •of this effort was presented td Textron and CT-DEP on March 16, 1990_.

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The computerized data will be compared to prevailing federal and state standards for potable water. A frequency of occurrence analysis will be performed on compounds exceeding standards to determine which would be appropriate indicator compounds of site contamination.

Arithmetic mean, geometric mean and variance will be computed for the subset of indicator compounds. Logarithmic time-concentration plots will be prepared for the compound subsets and linear regression will be performed to indicate changes in contaminant concentrations versus time for each well in which the indicator compound is present.

ESE has tabulated all historic site analytical data and is in the final steps of calibrating a spreadsheet to process this data. A meeting will be scheduled at which time ESE will propose a list of indicator chemicals for more detailed evaluation based on the frequency of occurrence analysis. Once CT-DEP concurrence with this approach is obtained, ESE will complete the time-concentration plots and linear regression analyses for the data subset.

Task 2 Complete New Topographic Survey of Existing Monitoring Wells

ESE proposes to conduct a new topographic survey of existing wells to resolve apparent discrepancies and determine reference point elevations of newly installed wells.

Historically, five surveys have been performed of wells that existed at the time of each survey. At least one survey, in 1985, coincided with the preparation of a site base map. Within the last two years, since the last effective topographic survey, in January of 1987, Monitoring Wells MW-IS, MW-2, MW-3S and MW-5S have been replaced and Monitoring Wells MW-ID, MW-3D and MW-5D have been newly constructed. Newly established reference point elevations at the top of the casing of these wells are, required to compile accurate water table elevation maps and determine the direction of ground water flow.

ESE will conduct a new survey of the top of the inner casing, top of the outer casing and land surface of each monitoring well. ESE will revise and update the site base map prepared in 1985. ESE assumes that Textron'will provide a mylar copy of the original site map which is suitable for revisions.

Task 3 - Evaluate the Potential for Tidal-Induced Flow in the Surficial Aquifer

CT-DEP continues to express concern about the influence of tidal fluctuations on ground water flow near the tidal inlet and the NPDES-permitted discharge. Textron's previous consultant attempted to characterize the extent of tidal fluctuations in Monitoring Wells MW-5S and a temporary well point completed in the tidal ditch. The tidal influence observed in MW-5S was used to extrapolate the inland distance over which tidal fluctuations could be occurring in the surficial aquifer. There was no attempt, however, to confirm the conclusions of this theoretical approach.

ESE proposes to conduct measurements through two successive tidal cycles in all wells. Water levels in Monitoring Wells MW-IS, MW-ID, MW-2, MW-3, MW-5S and MW-5D will be measured manually at a one-hour frequency. All other wells will be measured at a frequency of once per two hours. The hourly measurements will be collected in a compressed time interval to provide a series of 24 "snapshots" throughout the two tidal cycles. Water level hydrographs will be prepared showing observed changes in water levels versus time.

A tide gauge will be installed in the tidal channel to determine the range of tidal fluctuations. The measurements will be conducted during a spring tide period when the tidal ranges will be at a maximum.

ESE will prepare four ground water flow direction contour maps corresponding to two high tide and two low tide cycles, respectively. ESE will review the water level hydrographs and ground water flow contour maps to determine the degree, if any, of tidal interaction between the tidal inlet and the surficial aquifer.

Task 4 - Conduct Surface Electric Re of the Subsurface Peat Layer Conduct Surface Electric Resistivity Survey
to Determine Lateral and Vertical Continuity

Survey

tinuity

ertical extent

site and the

contaminant A major concern of CT-DEP is the lateral and vertical extent of the peat layer underlying portions of the site and the capacity of this layer in preventing vertical contaminant flow into deeper subsurface formations.

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ESE proposes two tasks to characterize this layer, although additional investigation may be required if the information | at the conclusion of the tasks is inconclusive or incomplete. The additional investigation would require the installation of costly test borings. It is anticipated that this expense can be avoided by first conducting the proposed investigation.

ESE proposes to perform an electric resistivity survey. The resistivity survey involves inserting four probes into the surface at set distances. A current is then applied to the outer set of probes. The current registered in the inner set of probes is then measured. Different earth materials exhibit different conductance properties. By increasing or decreasing the spacing between probes, different vertical layers of aquifer materials can be profiled.

The electric resistivity method is subject to outside external interferences, such as overhead high tension electrical transmission lines. This condition must be assessed before conducting the electric resistivity survey.

Different areas and depths will be profiled to determine the vertical thickness and lateral continuity of the peat layer. Data from areas with sufficient ground control (i.e., presence of test borings) will be used to determine the overall nature and extent of the peat layer.

Task 5 - Installation and Sampling of Deep Monitoring Wells to Assess the Presence of Contamination Beneath the Peat Layer ^

The absence of deep monitoring wells to determine water^ quality in formations beneath the peat layer is identified as a data gap in the CT-DEP August 11, 1989 CME Summary memorandum to the GWM File. ESE concurs that information about deeper stratigraphic units is necessary to determine

both the effectiveness of the peat layer in preventing vertical contaminant flow and whether regional hydraulic gradients are upward, thereby further preventing vertical flow into deeper aquifer zones.

ESE proposes to install three deep monitoring wells to assess whether contaminants are present in the aquifer beneath the peat layer. The deep monitorihg wells will be completed with screened intervals open only at the bottom of the glacial outwash'aquifer, directly above the bedrock surface.

The deep monitoring wells would be installed adjacent to existing shallow and'intermediate wells MW-10, MW-5S and 5D and MW-9. These well placements assume deep regional ground water flow is in an easterly direction.

The proposed well placements may change if a review of borings logs or results of the surface electric resistivity task (Task 4) indicate that the peat layer is discontinuous, and that downward leakage could be occurring through a "window" where the peat is absent. In this latter case, the proposed deep monitoring well near MW-9 would be relocated to the area of the suspected breach in the peat layer.

The wells will be drilled by, the standard,mud rotary method and completed with 2-inch diameter PVC well screen and casing, in accordance with CT—DEP guidelines for monitoring well construction. Following installation, ground water levels will be measured in the new wells and adjacent shallov/ wells to determine the vertical hydraulic gradient between aquifers.

The deep monitoring wells will be sampled to determine
whother contaminants are present at depth. These results whether contaminants are present at depth. would then be used to evaluate the significance of the peat layer. It is anticipated that contamination will be absent in the deep aquifer, in which case the confining capacity of the peat layer would no longer be a critical issue. Future attention could then be directed solely to contamination of the shallow aquifer.

Task 6 - Conduct Slue Tests to Determine Aquifer Hydraulic **Conductivity**

ESE proposes to conduct slug tests of existing monitoring wells to determine the hydraulic conductivity of the shallow aquifer. CT-DEP has requested in the August 11, 1989 CME

Summary memorandum to the GWM File that laboratory testing of The proposed slug tests will provide a field determination of water flow rates. hydraulic conductivity and enable a calculation of ground hydraulic conductivity be confirmed through field testing. |

Hydraulic conductivity is a measure of the potential for ground water flow through aquiter media. It is measured by means of slug tests. The slug tests entail displacing a given volume of water in each monitoring well and timing the rate at which the water in the well eguilibrates to the pre-test condition. Due to the anticipated rapid response in the wells, ESE proposes to measure recovery by means of a submerged pressure transducer.

The slug test data will be evaluated by standard analytical methods. ESE has developed a calibrated Lotus 1-2-3 spreadsheet to execute these calculations. ^

ESE proposes to conduct the slug tests after other site tasks are completed, and sufficient site data is available to accurately determine prevailing hydraulic gradients. ESE will conduct two additional rounds of ground water \angle measurements during the second and third quarter sample events. Ground water flow maps will be prepared to determine seasonal variations in site hydraulic gradients.

The hydraulic conductivity from the slug tests and hydraulic gradients measured during the first, second and third quarter sample events will be used to determine ground water flow rates in the surficial aquifer.

Task 7 - Report Preparation

ESE will complete two interim reports covering the tasks addressed above. The first report will provide a complete summary of historic ground water analytical data. The data will be compared to prevailing federal and state water quality standards and criteria. Maximum, geometric mean, arithmetic mean and variance will be computed for all indicator compounds identified through the frequency of occurrence analysis. ESE will use Cochran's Approximation to the Fisher Student t-test to determine statistically significant changes in ground water concentration compared to initial, background concentrations in accordance with 265.92(d)(2).

The second report will summarize the work performed, procedures used, information and data assembled, and conclusions obtained in the site geological and hydrogeological investigation described in Tasks 2-6. This report will recommend inclusion of the three deep monitoring
wells in the quarterly monitoring assessment program. Each wells in the quarterly monitoring assessment program. conceptual issue raised by CT-pEP will be individually addressed.

SCHEDULE

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Task 1 is nearing completion with development of a calibrated spreadsheet, and the data is now being checked to ensure correct entry. Data from the recent first quarter sampling event can be included when it is received, thereby providing a current assessment of contaminant distribution. An interim report summarizing the results of Task 1 can be prepared in approximately 4 weeks after receipt of the first quarter data. r

ESE believes the site work proposed in Tasks 2-6 can be completed in approximately 12 weeks. An additional four weeks will be required following completion of the field work to evaluate the data and prepare a summary report.

STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION

SITE NAME: AVCO Lycoming TOWN: S_A FILE TYPE E

STATE OF CONNECTICOT VS AVCO LYCOMING TEXTRON

IN THE MATTER OF AN ORDER TO AVCO LYCOMING TEXTRON TO ABATE POLLUTION AND COMPLY WITH CONNECTICUT'S HAZARDOUS WASTE MANAGEMENT REGULATIONS

ORDER

Having found that Avco Lycoming Textron, located at 550 South Main Street in Stratford, Connecticut, is in violation of Connecticut's Hazardous Waste Management Regulations and is maintaining a facility or condition which can reasonably be expected to create a source of -pollution to the waters of the State of Connecticut, under the provisions of Chapters 439 and 445K of the Connecticut General Statutes, as ammended, the Commissioner of Environmental Protection, acting under Sections 22a-6, 22a-432, and 22a-449 of the General Statutes, hereby orders Avco Lycoming Textron to comply with all the conditions of Order HM-358, entered as an Order of the Commissioner of Environmental Protection on the 25th day of September, 1986, except that;

- 1. Paragraphs A, B, and C, in conformance with written and oral requests from Avco Lycoming Textron, are modified by the Commissioner of Environmental Protection, acting under Section 22a-436 of the Connecticut General Statutes as amended, to read as follows:
	- A. On or before November 30, 1986, verify to the Commissioner of Environmental Protection that a qualified consultant has been retained to perform the necessary work under Directive 1.
	- B. On or before January 31, 1987, submit to the Commissioner of Environmental Protection for review and approval an assessment monitoring plan which, at a minimum, describes site hydrogeology as presently known, including summaries of existing hydrogeologic
and monitoring data: identifies and details further and monitoring data; identifies and details investigations needed to comply with Directive 1; and contains a schedule for implementation of all phases of the groundwater quality assessment plan. Such plan shall also include a sampling and analysis plan and recommendations for upgrading the physical condition of existing groundwater monitoring wells.

Phone: 165 Capitol Avenue • Hartford, Connecticut 06106 A n Equal Opportunity E - oloyer

Page Two Order No. HM-358, Modified

> C. On or before March 31, 1987 verify to the Conmissioner of Environmental Protection that the plan approved under step B has been implemented.

Entered as an Order of the Commissioner of Environmental Protection the 26th day of November 1986. 26th day of November

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<u>l</u>e "Stanley

Commissioner

Order No. HM-358 Modified Town of Stratford

Sent Certified Mail Return Receipt Requested

Appendix E-4

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Groundwater Assessment Monitoring Plan March 1987

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Avco Lycoming TEXTRON

Groundwater Monitoring Assessment

March 1987

Submitted by Metcalf & Eddy, Inc.

Metcalf & Eddy, Inc. **Engineers & Planners**

10 Harvard Mill Square Wakefield Massachusetts

Mailing Address PO Box 4043 Woburn, MA 01888-4043

March 23, 1987

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Ms. Donna L. Ashford Avco Lycoming TEXTRON 550 Main Street Stratford, CT 06497-2452

Subject: Groundwater Monitoring Assessment Program Connecticut DEP Order No. HM-358

Dear Ms. Ashford:

to submit the Groundwater Monitoring are pleased Assessment Program for the Avco Lycoming TEXTRON facility in We CT. This report describes site hydrogeology as Stratford, existing summaries of including hydrogeologic and monitoring data; identifies and details known, further investigations needed to comply with Directive 1 of the Order; and contains a schedule for implementation of the Groundwater Monitoring Assessment Program.

Very truly yours,

Carmine V. D. Filipper

Carmine V. DiFilippo Project Manager
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foreword

At the request of AVCO Lycoming Textron, Metcalf 6 Eddy, Inc. (M4E) has prepared this Groundwater Assessment Monitoring Plan for the surface impoundments at the AVCO Lycoming Textron facility in Stratford, Connecticut. The objective of this assessment monitoring plan is to provide a systematic, well defined method for determining the rate of migration, extent, and hazardous waste constituent composition of any release of materials from the surface impoundments. The plan describes the rationale for employing the chosen methodologies in an effort to illustrate that the implementation of this monitoring plan will result in full compliance with Subpart F of 40 CFR265, Connecticut's Hazardous Waste Management Regulations, and in particular, Connecticut Department of Environmental Protection's Administrative Order dated 25 September 1986.

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SECTION I

APPLICABLE REGULATIONS

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The Avco facility, which is owned by the U.S. Army and operated by Avco-Lycoming Textron is located in Stratford, CT just south (approximately 1,000 feet) of where the Housatonic River enters the Long Island Sound (Figure 1.1). The activities at the facility include the manufacturing of tank and aircraft engines. The production of these engines includes the plating of engine and other miscellaneous parts in zinc, cadmium, chrome, copper, magnesium, nickel and black oxide baths. The spent , plating baths are discharged to an equalization lagoon. Wastewater from this lagoon is pumped to a chemical waste treatment plant which, in turn, produces a metal hydroxide sludge

storage lagoons. In all, which is pumped to one of three sludge storage lagoons. AVCO has a storage capacity of 908,940 gallons in four surface impoundments.

ⁱ 1.1 Federal Regulations

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The operation of these hazardous waste surface impoundments has been regulated under the Resource Conservation and Recovery Act (RCRA) since the effective date of these regulations on Rovember 19, 1980. In compliance with the first requirement of RCRA, Avco submitted Part A of the RCRA permit application to the U.S. EPA on November 13, 1980.

On November 8, 1984, RCRA was amended by the "Hazardous and Solid Waste Amendments of 1984" (HSWA). Section 213 of the HSWA (#80)
Entities either cease operation required that all land disposal facilities either cease operation or submit a complete Part B permit application by November 8,

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1985. in compliance with this requirement, Avco submitted its Part B permit application to DSEPA, Region I and the Connecticut Department of Environmental Protection (DEP) on November 8, 1985. Ontil this permit application is reviewed and the final RCRA permit issued, Avco is considered to be operating under "interim status".

one requirement that interim status facilities must meet to prepare an adequate Part B permit application is to develop a groundwater assessment monitoring plan. According to 40 CFR, S270.14(c) permit applicants must provide in their permit application a complete description of any plume of groundwater contamination (if one exists), and, based upon any levels of contamination found, generate detailed plans for the appropriate 40 CFR S264 Subpart F groundwater monitoring program: detection² monitoring, compliance monitoring or corrective action. The groundwater assessment plan for Avco-Lycoming will determine if ^ ^ and to what extent the area groundwater may be contaminated.

1.2 CT DEP Regulations

As operators of four hazardous waste surface impoundments, Avco is also subject to the Connecticut Hazardous Waste 1.2 CT DEP Regulations

As operators of four hazardous waste surface impoundments,

Avco is also subject to the Connecticut Eazardous Waste

Regulations (Title 25, Chapter 54 cc(c)). With respect to

oroundwater monitoring groundwater monitoring, these regulations state that owner/operators should comply with 40 CFR Parts 265.90 to 265.94 (CT Section 25-54 cc(c) -33). However, the Hazardous Waste Management Onit of the CT DEP revised the groundwater monitoring reporting requirements in a February, 1984 memorandum which was sent to all facilities required to monitor groundwater and to all

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consultants dealing with groundwater monitoring. These report requirements were to supersede all state groundwater reporting requirements as well as 40 CFR 5265.94.

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It should be noted that this memorandum covered groundwater monitoring issues other than reporting. 40 CFR Part 265.93(b) states that the Student's t-test at the 0.01 level of significance should be used as the statistical test to determine statistically significant increases (and decreases, in the case I of pH) of indicator parameters over their background. The state
mentions that an underlying assumption for any of the standard. mentions that an underlying assumption for any of the standard. I t-tests is that the populations being compared have equal
Interesting that the example is assumption is variances. They further emphasize that this assumption is not variances. They further emphasize that this assumption is not
alid with groundwater requirements because upgradient results I for the first year have both seasonal and analytical variation,
while the subsequent quarter results exhibit only analytical
variance. The Connecticut DEP therefore, decided to adopt the while the subsequent quarter results exhibit only analytical variance. The Connecticut DEP therefore, decided to adopt the Cochran's Approximation to the Behran's-Fisher Student's t-test as the only t-test because it is designed to specifically compare populations with unequal variances.

With respect to the specific groundwater monitoring program at the Avco-£acility, the CT DEP has modified the groundwater requirements on two occasions. On June 6, 1983, personnel from Avco-Lycoming, CT DEP and Avco's groundwater consultant: teggette, Brashears and Graham Inc. (L.BiG) met to discuss the groundwater monitoring program (which had been in operation since November, 1981). In that meeting, Tom Stark of the CT DEP recommended a change in the parameters to be sampled from those

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specified in 40 CFR §265.92 to the first 12 site-specific parameters listed in Table 1.1. Then, in late 1983, Mr. Stark further added the indicator parameters Total Organic Carbon (TOC), Total Organic Halide (TOX) and specific conductivity. The entire list of site specific parameters used to characterize the groundWater at the Avco-Lycoming site is as follows:

All sampling data from the groundwater monitoring program is compared against the Connecticut Public Drinking Water Code (CPDWC) to determine if any groundwater violations have occurred. The CPDWC, similar to the National Interim Primary Drinking Water Regulations (NIPDWR) standards, refers, to

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dissolved concentrations of constituents (free of sediments). When possible the Cochran's Approximation of the Behran's-Fisher Student's t-test will also be used to determine if there has'been a statistical increase (or decrease for pH) in the indicator parameters.

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The groundwater assessment monitoring plan presented herein has been developed in compliance with the above mentioned state and federal regulations and requirements as well as the September 25, 1986 CT Dep Order (No. EM-358) requiring Avco to prepare such a plan.

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SECTION II

HYDROGEOLOGIC CONDITIONS

2.1 Subsurface Investigations

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several subsurface Investigations have been conducted and groundwater monitoring wells have been installed at the Avco-Lycoming facility at various times. Existing well and boring locations are shown in Figure 2.1. Wells No. 1 to 5 were installed in November, 1981 by Roy F. Weston, Inc. In July, 1983, Leggette, Brashears, and Graham (LB&G) installed two wells (No. 6 and 7) to help establish local groundwater flow directions. Between 18 and 27 September, 1985, M&E supervised the drilling of 18 borings, seven of which were completed as monitoring wells.

M&E's field work included the following: Eleven (11) borings (B-1, B-2, B-3, B-7, B-9, B-11, B-13, B-14, B-15, B-17 and B-18) were completed to a depth of 20 feet. Five (5) borings |Lm (B-4, B-6, B-10, B-12 and B-16) were completed to a depth of 30 ft. Borings B-5 and B-8 were completed to a depth of 25 ft. and 35 ft. respectively. Observation wells were installed in Borings B-1, B-2, B-6, B-14, B-15 and B-17 to a depth of 15 feet, except- B-14 which was completed to a depth of 14 ft. All borings, except where observation wells are installed, were grouted with cement from the bottom of the boring up to existing ground surface.

Two Stevens water level recorders were used to monitor ^ observation well ground water levels on the site. The recorders were placed in wells 1, 5, 10 and 13 for a period of one-to

several days between September 17, 1985 and October 4, 1985. The recorders were installed to determine the effect of tide changes in Long Island Sound and the Housatonic River on groundwater levels at the site. A temporary tide gage board was also installed adjacent to the site (oil loading dock) to check tide water levels.

A total of one hundred and one (101) soil samples were obtained primarily for chemical laboratory analysis to determine contaminant concentrations and distribution. Soil classification tests (wet sieve and hydrometer) were performed on selected samples. - Soil permeability data was extrapolated from effective grain size (D 10) values obtained from the wet sieve analysis test (See Appendix A).

Six borings (B-3, B-4, B-5, B-7, B-8 and B-9) were placed adjacent to lagoons Nos. 2, 3, and 4. Three borings (B-10, B-13, and B-16) were placed at the embankment toe of lagoon No, 1. All other borings were placed in areas surrounding the lagcon proper.

2.2 Subsurface Conditions/Stratigraphy
The Auco-Lucoming facility is under

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The Avco-Lycoming facility is underlain by glacial stratified drift deposits. The stratigraphy of the deposits beneath the lagoons has been determined by examining the logs of borings which are currently available (borings B-1 through B-18, Metcalf & Eddy, Inc., 1985). These borings were visually classified by an M6E geologist in the field using the Unified Soil Classification System. Grain size analyses and hydrometer

tests were run on selected soil samples. See Appendix B for boring logs and Appendix A for the grain size plots.

The uppermost 5 to 15 feet of soil consist of one or more of the following materials: fine to coarse sand with a trace of silt (SP); silty sand (SM); or fill, which is typically sand and gravel with varying amounts of silt. These uppermost materials are underlain by a variable and discontinuous layer of peat (OL). The organic peat was encountered in seven borings (B-2, B-4, B-5, B-8, B-9, B-10 and B-12,). The soils below the uppermost layer consist primarily of fine to coarse sand with varying amounts of gravel and a trace of silt (SP). Two geologic cross sections (see Figure 2.1) were prepared based on the existing soil borings and are presented in Figures 2.2 and 2.3. The peat ranged from 5.5 feet to a maximum of 20 feet in thickness in borings B-4 and B-10 respectively. Depth to the top of the peat layer ranged from 6 feet to a maximum of 17 feet below existing ground surface in borings B-2 and B-8 respectively. Bedrock was not encountered in any of these borings. The contract of the c

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Maps prepared by the U.S. Geological Survey (Wilson, et.al., 1974) indicate that bedrock occurs at a depth greater than 120 feet. Information regarding the depth to bedrock at this \backsim facility was not generated during recent field work.,

Soils containing hydrocarbon in varying concentrations were encountered during the course of the subsurface investigation. f Hydrocarbons were noted in six borings (B-4, B-7, B-8/ B-9, B-10 and B—12) by visual examination and varied from an oily odor to a black sludge.

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Based on the soil strata encountered, the following permeabilities have been computed from laboratory grain size analyses: silty sand (SM) $K = 3 \times 10^{-4}$ CM/SEC; poorly graded sand (SP) K = 150 X 10⁻⁴ CM/SEC; low plasticity silt (ML) K = 1 x 10^{-4} CM/SEC; peat (OL), K = 0.75 x 10^{-4} CM/SEC. Although estimating aquifer permeabilities from grain size analyses is valid, the results are only accurate within an order of magnitude. Until more accurate data are available from the scheduled stress and recovery tests, an average permeability of 3.5x10⁻² CM/SEC will be considered representative based on experience with similar aquifers.

FIGURE 2.2 SECTION A-A' GENERALIZED SUBSURFACE STRATIFICATION

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FIGURE 2.3 SECTION B-B' GENERALIZED SUBSURFACE STRATIFICATION

2,3 Hvdroqeoloqic Evaluation

As part of the subsurface investigation program observation wells were installed in six borings (B-1, B-2, B-6, B-14, B-15 and B-17). These wells supplement the existing observation wells (OW-l to OW-7) installed by R.F. Weston, Inc. and currently being monitored by IPC, Inc. as part of the assessment monitoring program.

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Groundwater Flow Directions and Gradients

The Avco facility and associated lagoons are located in a relatively flat area near the mouth of the Housatonic River. Ground surface elevations are generally lower than 10 feet (above mean sea level, National/Geodetic Vertical Datum). The water table is also fairly flat, and marshy areas with tidal channels exist in the vicinity of the site.

A regional surface water drainage divide exists west of Main Street. Groundwater flows in both the northeast and southwest directions away from the ridge of the divide. The presence of this divide infers the existence of a groundwater divide in the same proximity. Under non-mounding conditions, groundwater in the shallow part of the aquifer in the vicinity of the lagoons would be expected to flow primarily southeastward toward the tidal ditch or eastward toward the Housatonic River. A small percentage of the groundwater would be expected to flow downward into deeper parts of the aquifer.

The development of the area has had some significant effects $\overline{}$ on the hydrologic system. The large buildings and paved areas

yith Storm drainage systems greatly reduce groundwater recharge and generally cause a lowering of the water table.

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Recent surveys have provided measurement of 'all wells to a single datum (mean sea level) and allowed the plotting and contouring of groundwater elevations measured at four different times (see Figures "2.4, 2.5, 2.6 and 2.7). In unconfined aquifers when vertical gradients exist, only wells whose screen intersects the water table can be used to accurately plot water table contours. 'Figures 2.4, 2.5, 2.6 and 2.7 should be interpreted as total head contours because the plots were developed using both wells that intersect and that are below the water table. Plots of the wells that do intersect the water table are presented in the Vertical Gradient portion of this section. Water elevations for the four dates of measurement are shown in tables presented in Appendix C. The groundwater elevation data and well construction data, see Figure 2.8, allow estimates to be made of vertical gradients and flow directions, and are presented as part of this section.

On all the measurement dates, except June 27, 1986, some groundwater mounding is apparent in the vicinity of the equalization lagoon, the western sludge lagoon and Building 6. The groundwater contours for the June 27, 1986 data show mounding only in the vicinity of the equalization lagoon. The apparent mounding near the equalization lagoon may be due to the tides, the effects of which have already been observed in Well 5, adjacent to the equalization lagoon. In support of this observation are the groundwater contours which were prepared

FIGURE 2.5 GROUNDWATER ELEVATION CONTOURS, APRIL 19, 1986

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based apon data from the shallow wells and do not include Well 5 (see Figures 2,9, 2.10, 2.11 and 2.12) which show no apparent mounding near the equalization lagoon. Groundwater level data from Wells 1, 10 and 13 indicated no tidal fluctuation in these observation wells. The overall effect of the tides and mounding has obscured flow directions and gradients by introducing vertical gradients

Vertical Gradients

Vertical"gradients occur in areas of groundwater recharge and discharge. The apparent groundwater mounding at the Avco-Lycoming facility imparts downward vertical gradients in the vicinity where the recharge is occurring. Upward vertical gradients occur as groundwater flows toward natural discharge areas, such as the Marine Basin and the mouth of the Eousatonic River adjacent to the Avco-Lycoming facility. On a regional scale, groundwater flow directions toward large discharge areas, such as the mouth of the Housatonic River, can be estimated, but on a smaller scale actual groundwater contours are used. In the absence of unobscured groundwater contours, areas of increasing vertical gradients can serve to identify a local discharge area toward which local groundwater is flowing. Normally, paired ,roundwater wells with screens set at different elevations are used to measure vertical gradients. At the Avco-Lycoming / facility, although the 13 existing monitoring wells are distributed over approximately 40 acres, they are screened at different elevations (see Figure 2.8).

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FIGURE 2.8 AVCO - LYCOMING MONITORING WELL SCREEN SETTINGS

TO take advantage of the different screen settings, the groundwater measurements for a given date were plotted, separately for shallow wells (8, 9, 10 ,11, 12 s 13) and deep wells (1, 2, $3, 4, 5, 6 \t{2}$), see Figures 2.9 through 2.16. The next step was to superimpose the groundwater level contours from shallow and ^ deep wells and plot the contour intersection points.

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To compute a vertical gradient at any contour intersection points, the deep head value is subtracted from the shallow head value and the difference divided by the average screen = separation of 13.38 feet. This data has been procted and t step was

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presented . contoured for the four complete measurement dates and presented in Figures 2.17, 2.18, 2.19, and 2.20.

One feature present in all the vertical gradient figures is a trough of increasing upward vertical gradients in the southcentral portion of each figure. This location coincides with the location of the equalization lagoon and the small tidal drainage central portion of each figure. This location collectes with the
location of the equalization lagoon and the small tidal drainage
ditch which flows to the marine basin. One characteristic of groundwater discharge areas is that vertical gradients increase approaching the discharge area. This condition is evident near the tidal ditch in all the vertical gradient figures indicating the tidal ditch is a local groundwater discharge area even under varying groundwater conditions. Comparison of the magnitudes of the vertical and the horizontal gradients in the vicinity of the tidal drainage ditch also demonstrates a predominant upward flow. The vertical gradients exceeded the horizontal gradients by a factor of between 15 and 23 for all four of the measurement dates. Even considering a ratio of horizontal to vertical

permeability of 10 to 1, and using Darcy's equation the minimum ratio of vertical to horizontal groundwater flow would be 1.5 to 1. Because the vertical gradients are upward, 1.5 times the horizomtal flow is discharging upward to the tidal drainage ditch. Based on these findings, horizontal groundwater flow beneath the Avco-Lycoming facility could be considered to be toward the tidal drainage ditch.

Horizontal Gradients

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While flow directions can be inferred from the location of discharge areas, natural horizontal gradients cannot be While flow directions can be interted from the exercise.

discharge areas, natural horizontal gradients cannot be

calculated using existing contour data because of the apparent

mounding. One way of estimating horizontal mounding. One way of estimating horizontal gradients is to use known aquifer parameters in an analytic model. An analytic model which incorporates all the essential hydrogeologic features of the aquifer beneath the Avco-Lycoming facility is a steady unconfined flow with uniform vertical recharge. Figure 2.21 presents a schematic diagram of the model along with the calculations to determine an average horizontal gradient of 0.02 feet per foot beneath the Avco-Lycoming facility. While the use of a model to determine a gradient is an indirect method, this solution is based on site specific aquifer data and could be used in other flow calculations until gradients can be seasured or determined more accurately.

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FIGURE 2.14 DEEP GROUNDWATER ELEVATION CONTOURS, APRIL 19, 1986

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FIGURE 2.18 VERTICAL GROUNDWATER GRADIENTS, APRIL 1986

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FIGURE 2.21 STEADY UNCONFINED FLOW WITH UNIFORM VERTICAL RECHARGE

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SECTION III

EXISTING DETECTION MONITORING SYSTEM

The thirteen (13) groundwater monitoring wells at the Avco-Lycoming facility have been installed on three different occasions: '

A schematic diagram of the well construction details is presented in Figure 3.1, elevations of the individual 10-foot screen settings and groundwater measuring points is presented in Figure 2,8, and the location of all monitoring wells is presented \setminus in Figure 2.1.

3,1 Detection Monitoring Wells

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Detection monitoring at the Avco-Lycoming facility has been conducted using seven (wells 1-7) of the current thirteen (13) wells. Wells 1, 2, 3 and 5 were used as downgradient, point of compliance wells based on their locations adjacent to the sludge and equalization lagoons. Wells 6 and 7 served as background groundwater quality sampling points based on an assumed southeast groundwater flow direction.

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FIGURE 3.1 SCHEMATIC OF AVCO-LYCOMING MONITORING WELL CONSTRUCTION

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3.2 Limitations of Detection Monitoring System

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As a result of groundwater mounding in the vicinity of the sludge and equalization lagoons, groundwater elevations in all the detection monitoring wells were excessively high (see Figures 2.4, 2.5 and 2.6). The overall effect of the mounding was to obscure 'any natural flow directions or gradients.

Another limitation in the detection monitoring system is that there are no well clusters and the well screens were set at similar elevations (see Figure 2.8). As all the groundwater measurements were essentially made near the same screen elevations, no estimates could be made of vertical gradients.

Well 5, a compliance point well adjacent to the equalization lagoon, is also adjacent to the tidal drainage ditch (see Figure 2.1). Continuous groundwater level measurements in Well 5, using the Stevens recorder, demonstrated a response of more than 1 foot to tidal fluctuations. As a result, groundwater measurements in Well 5 would read higher than the natural groundwater elevation if the reading is not made about the time of low tide. ^

The overall extent of aquifer response to tidal fluctuations has not been fully evaluated. The tidal response test was conducted in monitoring Wells 1, 5, 10 and 13, and the only noted response to tidal fluctuations was in Well 5. The response to tidal fluctuations in a unconfined aquifer is primarily a function of distance from ocean and permeability, the nearer the ocean, the greater the response. Well 5 is located adjacent.

50 feet, to the tidal drainage ditch, which experiences delayed effects of the tides from the Marine Basin. As part of the imple entation of the assessment monitoring program for the Avco-Lycoming facility, further investigative work is scheduled i February 1987 to assess the extent of tidal effects in the ayed

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n IX. and the tidal drainage ditch, which experiences delayed

effects of the tides from the Marine Basin. As part of the

implementation of the assessment monitoring program for the Avco-

Lycoming facility, further investigati

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SECTION IV

SUMMARY OP DETECTION MONITORING DATA

1.1 1981-1982 I

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Groundwater detectioa monitoring at Avco-Lycoming began in November 1981 with the installation of monitoring wells 1-5 by Roy F. Weston, Inc. The first quarter of sampling of these wells was also conducted by Weston at this time. In March 1982, Was also conducted by Weston at this time. In March 1982,
Leggette, Brashears & Graham, Inc. (LB&G) of Wilton, Connecticut
Was retained by Avco to replace Weston in conducting the was retained by Avco to replace Weston in conducting the groundwater monitoring activities at the facility. The second, third and fourth quarter sampling was performed on March 31/ 1982, June 29, 1982 and September 28, 1982. The water chemistry ¹ for this first year of sampling was performed by the Baron
² for a first company, Orange, Connecticut. The parameters a Consulting Company, Orange, Connecticut. The parameters analyzed were those specified under 40 CFR \$265, Subpart F.

> The results of the first year's monitoring were summarized in a report prepared by LB&G on October 29, 1982. These results were intended to show the initial background concentrations to which subsequent analyses could be compared. However, they would eventually be discarded.

1.2 1983-1984

On June 6, 1983, personnel from Avco-Lycoming, LB&G and the Connecticut DEP met to discuss the groundwater monitoring program. Tom Stark of the Connecticut DEP changed the parameters to be sampled from those specified in 40 CFR 5265.92 to the first 12 parameters listed in Table 4.1.
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TABLE 4.1. GROUNDWATER MONITORING PARAMETERS SPECIFIED BY THE CONNECTICOT DEP

In July of 1983, LB&G installed wells 6 and 7 to establish the local groundwater flow direction. LB&G completed two quarterly samplings on August 15, 1983 and November 14, 1983 before the DEP added the indicator parameters of specific conductivity, total organic carbon (TOC), and total organic i halide (TOX). Because these indicator parameters were not measured in August and November 1983, it was not possible to make a statistical comparison between first and second year indicator parameters. Therefore, Mr. Stark recommended that the 1983-1984 program be substituted for the first year of analytical results ^ (1981-1982). LB&G agreed with his recommendation, discarded the first year of data and began the monitoring program anew in 1983.

The final two quarterly samples of the (now) first year of sampling were taken on February 13, 1984 and May 9, 1984.

Laboratory analysis for each of the four quarters was performed \langle by the Environmental Science Corporation (ESC) of Alddletown, Connecticut.

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The "first" year summary report was prepared on November 6, 1984. In that report, the results of the groundwater sampling indicated that separately or in combination, total and hexavalent chromium, total cyanide, trichloroethylene and ^f tetrachloroethylene had been discontinuously detected above the Connecticut Public Drinking Water Code Limits (CPDWC) in wells ^y 1-5 and not in wells 6 and 7. Table 4.2 shows the specific exceeding parameters detected for each well. (Appendix D contains tables listing all water quality data for the first monitoring year).
It should be

It should be noted with regard to this year of sampling that the groundwater samples were not filtered prior to analysis. The CPDWC, similar to the National Interim Primary Drinking Water Regulations (NIPDWR) standards, refer to dissolved concentrations of constituents (filtered) in sediment-free drinking water. On

November 14, 1984, the U.S. Army Environmental Hygiene Agency

(USAEHA) observed the groundwater sampling procedures. In

addition to observing the sampling, November 14, 1984, the U.S. Army Environmental Hygiene Agency (USAEHA) observed the groundwater sampling procedures. In addition to observing the sampling, the USAEHA took replicate samples and filtered these with a Millipore hazardous waste filtration device with 0.45-micron membrane filters. An unfiltered sample for well 5 showed a chromium concentration of unfiltered sample for well 5 showed a chromium concentration of the contraction of the co

table 4.2. AVCO-LYCOMING DIVISION, STRATFORD, CONNECTICUT CHEMICALS DETECTED IN GROONDWATER SAMPLES IN CONCENTRATIONS ABOVE CPDWC LIMITS⁽¹⁾

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1. Connecticut Public Drinking Water Code.

2. Not available.

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same well contained 0.011 milligrams per liter of chromium. Therefore, as illustrated in this sample, it nay not be appropriate to compare unfiltered sample values to the BIPDWR or CPDWC standards. This point was not considered by LB&G when they presented their conclusions in the summary report.

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In that report, LB&G stated that "the detection of these chemicals in wells adjacent to the existing surface impoundments suggests that these chemicals are leaking from the impoundments into the shallow groundwater aquifer."

LB&G went on to conclude that a more extensive monitoring system was not necessary for the following reasons:

- 1. The total absence of any existing or potential future groundwater users in the area.
- 2. The relatively low concentrations of contaminants detected near the suspected sources.
- 3. The close proximity of the site to a discharge area where the concentrations of groundwater contaminants would be further diluted.
- 4. Plans to build a new treatment facility would include the removal and treatment of the contaminated material from the impoundment areas, thus removing the source of contamination.

LB&G also stated that with the present design, of the program, statistical analysis was not possible because of the absence of TOG, TOX and specific conductance data for the first two quarters. However, this analysis was considered "probably

not necessary" to show the impact of the lagoons on the |
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| groundwater because there are definite signs that the lagoons are affecting the quality of the upper-most aquifer.

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The "second" year of detection monitoring began on October 10, 1984 with the first quarter of sampling. Subsequent quarterly samples were taken on January 24, 1985, April 26, 1985 and August 8, 1985. All laboratory analyses were performed by ESC.

The second year summary report, dated November 14, 1985, again showed that total chromium and total cyanide were detected above the CPDWC limits in wells $1-5$ (Table 4.3). (Samples taken I during the fourth quarter were submitted to the laboratory as both filtered and unfiltered samples in order to view any discrepancies caused by the sampling technique.) A review of the data also revealed that with the exception of increasing trends in TOC and TOX values no significant changes in water quality had occurred. (See Appendix D for actual analysis data.)

The conclusions of the second year report simply reiterated those of the first year's. Again, the surface impoundments were considered to be having an impact on the shallow groundwater system in the nearby area due to detected concentratipns of contaminants above the CPDWC. One new piece of information provided by this report was a determination of the mean and variance background data for the contamination index parameters

(TOC, TOX, pH and specific conductance) based on the results of what L, B & G considered to be the upgradient wells: 6 and 7 (Table 4.4). With this information, subsequent year's of groundwater monitoring data could be compared to these background values using the Cochran's approximation of the Behren's-Fisher Student's t-test to determine if there has been a statistical i increase in the indicator parameters.

TABLE 4.3. AVCO-LYCOMING DIVISION, STRATFORD, CONNECTICUT .3. AVCO-LICOMING DIVISION, SIRAIFORD, COMM.
CHEMICALS DETECTED IN GROUNDWATER SAMPLES, IN CONCENTRATIONS AT OR ABOVE CPDWC LIMITS' '' (SECOND YEAR MONITORING PROGRAM)

| | Date | | | | CPDWC |
|----------------------|--------------------|--------------------|--------|-------------------------------|-----------------|
| Parameter | 10/10/84 MW No. | 01/24/85 MW No. | MW No. | $04/26/85$ 08/08/85 MW No. | limits (ppm) |
| Chromium (total) ppm | | 3,5 | 3,5 | $3^{(2)}, 5^{(3)}$ 0.05 | |
| Cyanide (total) ppm | | $\mathbf{2}$ | | \mathbf{R} | 0.2 |

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 $\begin{array}{c}\n\begin{bmatrix}\n\frac{\partial}{\partial x} & \frac{\partial}{\partial y} \\
\frac{\partial}{\partial z} & \frac{\partial}{\partial z}\n\end{bmatrix} & \text{if } y \in \mathbb{R}^n, \\
\begin{bmatrix}\n\frac{\partial}{\partial x} & \frac{\partial}{\partial z} \\
\frac{\partial}{\partial z} & \frac{\partial}{\partial z}\n\end{bmatrix} & \text{if } y \in \mathbb{R}^n. \end{array}$

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 $\sum_{i=1}^n$

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2. Dissolved equals 0.02 ppm (filtered). 2. Dissolved equals 0.02 ppm (filtered). Total equals 0.07 ppm.
3. Dissolved equals 0.03 ppm (filtered). Total equals 0.10 ppm.

Dissolved equals 0.03 ppm (filtered). Total equals 0.10 ppm.

Although this analysis had not yet been performed, the contaminants chromium and cyanide showed an observed trend of consistently appearing in wells 3 and 5. Due to these increased concentrations Metcalf & Eddy, Inc. was retained by the U.S. Army Corps of Engineers, New York Division, in September 1985 to perform hazardous waste management services at the Avco facility. These services include (among others) the following activities:

TABLE 4.4. AVCO-LYCOMING DIVISION, STRATFORD, CONNECTICUT MEAN AND VARIANCE FOR OPGRADIENT NELLS WELLS 6 AND 7 \bullet

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TABLE 4.4 (Continued). AVCO-LYCOMING DIVISION, STRATFORD, CONNECTICUT
MEAN AND VARIANCE FOR OPGRADIENT WELLS

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* Denotes less than
1/ Fourth quarter sample obtained August 22, 1985.

- (1) Drill borings in the vicinity of the four lagoons to determine the extent of soil contamination at the site. (Contaminated soil is defined as soil contaminated above background.)
- (2) Install additional groundwater monitoring wells to determine the local ground flow direction and to determine the extent of groundwater contamination.

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In Septenbec 1985, soli borings were taken and additional monitoring wells No. 8-13 were installed at various locations around the surface impoundments. The six new monitoring wells combined with the original seven wells comprise the existing 13-well groundwater monitoring network which is Intended to provide the components necessary to address the groundwater monitoring assessment program. Therefore, the third year of groundwater quality data is addressed under Section VIII, Summary of Assessment Monitoring Data, and will be used to ascertain the rate, extent and concentration of contaminant movement.

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SECTION V

APPROACH FOR CONDUCTING ASSESSMENT MONITORING PROGRAM

As a result of suspected contaminant leakage from one or more of the Avco-Lycoming surface impoundments, a detailed groundwater assessment program has been established and will be implemented. The primary objectives of the groundwater assessment program will be to determine the extent of all hazardous waste constituents in the uppermost aquifer leaking from Avco-Lycoming surface impoundments and estimate the rate of migration of those constituents in groundwater.

In achieving those objectives, this groundwater assessment program, in the following sections, will outline the construction details of existing groundwater monitoring wells (Section VI), the sampling and analyses procedures of the uppermost aquifer (Section VII), the summary and reporting of the monitoring data (Section VIII), the procedures to determine the extent and rate of contaminant migration (Section IX), and a schedule of implementation. The existing groundwater database has been used to develop the assessment program and identify specific program deficiencies and methods to correct those deficiencies.

Specific items that were deficient in the previous groundwater assessment program include: t

- A detailed interpretation of the site hydrogeology $\mathbf{1}$.
- An estimate of any tidal influences on local groundwater $2.$ **flow**

3. Estimates of vertical groundwater gradients

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- 4. Determination of aquifer parameters of the site
- 5. interpretation of contaminant plume on a yearly basis
- 6. A schedule for implementing the groundwater assessment program, and
- 7. A single survey of all monitoring wells tied to a mean sea level datum.

Each of these items is addressed in this assessment monitoring plan. Items 1, 2 and 3 are addressed in Section II of this plan. Items 4 and 5 are addressed in Section IX, and item 6 is addressed in Section X. Item 7 was addressed on Monday 29 December 1986. Monitoring well survey data is contained in Appendix C and is reflected in all figures in this plan.

This assessment monitoring plan has been designed around a direct method of sample collection and chemical analysis to determine actual water quality. This method includes the use of seven original groundwater observation wells (Detection System) and six additional observation wells. Together, the 13 wells comprise the Assessment Monitoring System.

Assessment Monitoring data will be collected, at a minimum, on a quarterly basis. Water elevations, depth to sediment in the well, and general condition of the well will be noted on each sampling date. Thirteen groundwater samples will be extracted, packaged, shipped, and analyzed according to the sampling and analyses procedures outlined in Section VII. The method and procedures for evaluating the assessment monitoring data is described in Section IX.

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SECTION VI

EXISTING ASSESSMENT MONITORING SYSTEM

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AS described in Section III, thirteen (13) groundwater monitoring wells comprise the groundwater assessment monitoring program for the AVCO-Lycoming, facility. The wells were installed on three different dates:

A schematic diagram of the monitoring well construction is presented in Figure 3.1, elevations of individual well screens and groundwater measuring points are presented in Figure 2.8, and the locations of all assessment monitoring wells are presented in Figure 2.1.

6.1 Assessment Monitoring Wells

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The uppermost aquifer beneath the Avco-Lycoming facility is comprised of a fairly uniform silty sand over a less silty sand, at approximately 20 feet, that contains some discontinuous peat layers. While no borings or observation wells have been drilled to the bottom of the aquifer, published reports cite the depth to bedrock at approximately 120 feet. Major groundwater discharge areas include Frash Pond, the mouth of the Housatonic River, the

Marine Basin and the numerous wetlands surrounding the Igor |/ Sikorsky Memorial Airport.

Analyses of local flow directions and yertical gradients presented in Section II propose a southeasterly groundwater flow ^ toward the tidal drainage ditch. Even under varying mounding conditions the method demonstrated increasing upward vertical gradients around the tidal drainage ditch. Groundwater discharging to the tidal ditch which drains to the Marine Basin, effectively extending the basin's influence as a groundwater discharge area to the Avco-Lycoming facility.

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Based on the demonstrated location of a local groundwater discharge area at the tidal drainage ditch and an assumed southeasterly groundwater flow direction toward the ditch, existing monitoring wells that are considered as being upgradient of the hazardous waste management units are Wells 6, 7 and 12. As Figure 2.8 demonstrates, Wells 6 and 7 are screened a minimum of 10 feet below any measured water table, while well 12 is screened almost at the water table. This vertical screen distribution provides 20 feet of vertical-upgradient groundwater ; sampling in the top 25 feet of the uppermost aquifer. Wells 1, 2, 3 and 5, by virtue of their locations adjacent to the three sludge and equalization lagoons, are point of compliance wells in the assessment monitoring program. Wells 8, 9, 11 and 13 are downgradient of the hazardous waste management units, and serve as downgradient migration points in the groundwater assessment monitoring program. These wells should provide sufficient <

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information pertaining to migration downgradient of the ■anagement lagoons•

6.2 Limitations of Assessment Monitoring System

Although the Avco-Lycoming assessment monitoring system is an existing groundwater monitoring network, a number of system deficiencies have been identified. Along with the deficiencies, corrective actions have been developed and will be implemented. The following table presents a list of the noted system deficiencies along with their proposed corrective actions:

8. Data gaps for shallow parts of the aquifer in the central piezometer in the tidal part of the facility due to the spatial distribution of the deep and shallow wells. Place a well-point drainage scale at the site. The piezometer will provide additional information pertaining to the potentionetric

surface.

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1) See Section IX for detailed explanation of proposed tests and methods

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SECTION VII SAMPLING AND ANALYSES PROCEDURES

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The objective of Metcalf & Eddy's sampling and analysis program is to ensure that all measurement, data gathering, and data generation activities yield data that are of adequate quality for the intended use. The key to achieving this objective is the successful implementation of project specific Quality Assurance and Quality Control procedures for all such activities.

This section identifies site specific sampling, analysis and quality control procedures for the groundwater monitoring activities at Avco-Lycoming Textron of Stratford Connecticut and specifically addresses sampling, analysis and Quality Assurance i (QA) issues for groundwater monitoring at that site.

section outlines the procedures and methods to be employed all sampling episodes conducted by Avco and its subcompresented in the EPA document according to guidelines section outlines the procedures and methods to be employed for all sampling episodes conducted by Avco and its subcontractors.

The procedures set forth in this section have been prepared according to guidelines presented in the EPA document "Interim Guidelines and Specifications for Preparing QAPP's* QAKS-005/80 as well as the guidelines established by EPA (August 26, 1985) based upon the type of work being performed and the intended use of the data.

7.1 Organization and Responsibility

Figure 7.1 presents the Organisational Chart for sampling and analysis activities and identifies the individuals responsible for each element of the overall program.

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ORGANIZATION CHART

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The subcontract laboratory, which will provide analytical services during the sampling episodes, will be Milford Labs of Milford Connecticut. Milford Labs is to provide Avco with environmental analysis services together with technical support in the application of the chemical data produced, and stands committed to providing chemical measurements of a quality consistent with project needs and requirements in a reasonable time while maintaining cost control. The actual sampling and field measurements are the responsibility of the Westport Connecticut based firm of IPC; an organization which recognizes the need for field data to be representative of the environmental conditions under consideration, to be valid and reliable as well as suitable for making decisions that involve public health and safety, property rights, and legal liabilities. IPC is committed to employing proper field protocol, acquiring appropriate equipment suitable to the protocol, maintaining such equipment in good condition, securing qualified staff, and to coordinating all aspects of operation so as to produce a useful report.

7.2 Sampling ^

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All sampling methods described in this section are project specific SOP's based on recognized USEPA procedures.

Selection of Sampling Locations

Information obtained during the initial records review and site visit was compiled and reviewed to assist with selection of sampling locations for groundwater.

The selection of actual sampling locations was made by utilizing the preliminary information in conjunction The selection of actual star.

utilizing the preliminary information in conjunction with several

criteria necessary to collect representative samples from the Avco site:

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- 1. Locations were selected to maximize the ability to intercept a contamination migration plume from on-site contamination, if one exists. This criteria was considered for the location of groundwater monitoring wells.
- 2. Sampling locations were positioned near areas with the greatest potential for contamination within the site.
- 3. Where possible, groundwater sampling locations have been selected to characterize all major work areas and boundaries of the site. The sampling locations for, groundwater are presented in Figure 7.2.

Groundwater Sampling

Thirteen (13) groundwater monitoring wells have been previously installed at the site. The well locations were chosen to provide upgradient or background wells, in addition to wells which were anticipated to intercept the groundwater flow from areas of potentially high contamination.

Measurements from the first two years of detection monitoring have indicated no violation of the CPDWC standards at Wells 6 and 7, but violation of these standards has been noted on

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FIGURE 7.2 LOCATION OF EXISTING GROUNDWATER ASSESSMENT MONITORING WELLS

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occasion at wells 1 through 5. Based on these considerations, and an assumed southeasterly groundwater flow direction, Wells 6, 7, and 12 are considered to represent background water that has not been affected by leakage from the surface impoundments.
Wells 8, 9, 11 and 13 will be used to monitor for any migration of contaminants away from the surface impoundments.

Groundwater monitoring wells 1, 2, 3 and 5 should qualify as point of compliance wells because they are located so that any off-site migration of hazardous constituents should pass through these wells.

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Samples to be Collected

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Table 7.1 summarizes the samples to be collected as described above and identifies the parameters to be measured on each sample.

Sample Collection Methods for Groundwater

Monitoring Wells

Each of the thirteen groundwater monitoring wells will be sampled on a quarterly basis for a duration of 30 years beyond closure of the surface impoundments. As shown in the previous Table 7.1, certain field generated quality control samples will be collected and submitted to the analytical laboratory. Before a sample is collected from a well, the standing water level and depth to the bottom of the well will be measured and recorded. The well will be pumped with clean, decontaminated equipment to

TABLE 7.1
d and Parameters to be Analyzed Samples to be Collected and Parameters to be Analysed Avco Lycoming Textron

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(1) As specified by CTDEP, page XIV-4 of Avco Lycoming Part B application (October, 1985 Metcalf & Eddy);

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- (2) Assumes two sampling teams for 1 day; (i.e. 1 CC sample per day per team)
- (3) As discussed on page XIV-6 of Avco Lycoming Part B Application, Metcalf & Eddy) the CPDWC, similar to the National Interim Primary Drinking Water Regulations (NIPDWR) states of refer tc dissolved concentrations of constituents (filtered) in
sediment free water. Therefore, all metals are to be determined
on samples after filtration through a 0.45um membrane in the field
- (4) Must be determined in quadruplicate (four replicate analyses) per 40 CFR S265.92 (b)(3) and (c)(2) of 40 CFR Part 265 "Interim Status Standards for Owners and Operators of Eazardous waste Treatment, Storage and Disposal Facilities

remove a quantity of water equal to five times the submerged volume of well casing. If the well does not recharge fast enough to permit removing five casing volumes, the-well shall be pumped to dryness and subsequently sampled as soon as sufficient recharge has occurred.

In particular, a standard operating procedure for well sampling has been prepared for this project and is presented below.

Sampling Procedure -- Avco Groundwater Monitoring Wells

The equipment required for each sampling team includes;

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- 1. Stainless steel weighted tape to measure the standing water level and depth of well. "Chalking" of the tape will not be allowed during this operation.
- 2. Bladder, Fultz, or positive displacement hand pump to purge the well. Entire pump and discharge lines to be constructed of non-contaminating materials and decontaminated before use.
- 3. Teflon bailers.to collect the sample. Teflon bailers are typically closed top, 1.66" O.D., five feet in length, with ball valves at top and bottom. Bailers will be inscribed with sequential numbers for stock tracing.
- 4. Woven nylon rope to be used as leader line for bailers. A new length of clean rope will be prepared for sampling at each well.

- 5. Glass funnels to facilitate filling sample bottles (not VOA I vials) may be used if properly cleaned before use. Preferably, the laboratory should be instructed to provide wide-mouth bottles.
	- 6. Sample bottles prepared per standard lab washing procedure described in Section 7.3.
	- 7. Disposable polystyrene cups for collection of field momitoring aliquots. Temperature, pH, and conductivity will 'be measured in these aliquots.
	- 8. Thermometer for monitoring temperature, meeting ASTM specifications.
	- 9. pH meter.

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- 10. Conductivity meter.
- 11. Fisher Scientific "buffer pak®" containing factory prepared, certified, dated, pH standards of 4.0, 7.0, and 10.0 pH units.
- 12. Single use KCl calibration standard (nolar concentration per manufacturer's recommendations) for calibration of conductivity meter.

General: Sampling will proceed beginning with the wells located in the areas of least contamination (up gradient) and proceeding to areas of most contamination.

Procedure

1. Calibrate pH meter with two buffers before each use. Select standard buffers which will bracket the pH of the sample to

be measured. Calibrate conductivity meter with standard KCl
solution according to manufacturer's instructions. Record in field book.

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- 2. Unlock protective casing on well.
- 3. Using decontaminated measuring tape (refer to SOP for decontamination, Section 7.3), measure and record in field
book the static groundwater level in the well, and then the depth to the bottom of the well.
- 4. Using the measured depth of standing water and a well volume table for that diameter well, note and record the volume of standing well water corresponding to the measured depth.
- 5. Using the decontaminated purging pump (refer to 7.3 for decontamination), purge five well volumes from the well. The volumes will be estimated by discharging all purge water to a calibrated container. During the purging, the temperature, conductivity, and pH will be measured and recorded at intervals no greater than every 15 minutes. Purging will be stopped after five well volumes have been pumped providing pH and conductivity readings have stabilized. (i.e., any given pH or conductivity reading demonstrates no more than a 10% change from the previous reading.) A minimum of three readings is required. The discharged water is to be containerized and ultimately discharged to the facility treatment system. Do not dispose of the discharge water by allowing it to drain on the ground.

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6. Withdraw two full bailers of groundwater from the well prior to sampling. Use a freshly decontaminated bailer and length of unused nylon rope which has been dedicated for that well. The rope must not contact the ground.

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- 7. Osing the same bailer and nylon rope, collect groundwater samples from the well. Record time at beginning and end of bailing. During sample collection, the rope and bailer must not touch the ground or any objects except the well casing. Personnel filling sample bottles must wear new PVC gloves.
- 8. Immediately transfer the groundwater sample directly from the bailer to the appropriate sample containers. Fill VOA vials directly from the bailer, avoid bubbling of sample, and eliminate all air bubbles from vials. The use of a decontaminated glass funnel may be used to facilitate sample transfer to all other bottles. Field filtration of samples for metals is required and should be performed as follows;
	- a. Withdraw 100 ml of sample to be filtered into a new 120CC disposable, polyethylene syringe.
	- b. Invert syringe and attach an Acrodisc® 0.45) membrane filter to the filled syringe.
	- c. Hold filter/syringe assembly upright over the sample bottle and gently depress plunger of syringe to discharge filtrate directly into sample bottle.

d. Remove Acrodisc from syringe.

e. Refill syringe as before.

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- Attach a new Acrodisc to syringe and proceed as in c f_z above.
- g. Continue until required volume of filtrate has been collected.
- h. Prepare a field/filtration blank by passing a volume of blank water equal to the volume of filtrate collected through new Acrodiscs in the same manner as samples.
- i. One filtration blank per LOT of filters used is sufficient to demonstrate the absence/presence of metallic impurities in the filter/syringe assembly.
- j. Preserve filtrates to pH <2 with nitric acid.
- 9. Collect a final sample aliquot, and dispense into 4 separate disposable containers. Immediately measure and record pH, temperature, and conductivity on each of the four containers. Always measure temperature first, conductivity second and pH last.

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- 10. Immediately label and place all sample bottles in iced shipping coolers. Record sampling details in field log book and complete chain of custody forms.
- 11. Repeat Steps 6 through 9 to satisfy duplicate sample requirements.

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12. Decontaminate all sampling equipment according to Standard Operating Procedures. Obtain a sampling/field blank after ^ collection of the samples from the last well as follows:

- a. Obtain a large quantity of fresh, deionized,

analyte-free water in glass containers from

subcontract laboratory. analyte-free water in glass containers from the subcontract laboratory.
	- b. Pour the deionixed water through all decontaminated sampling equipment as in field procedure.

c. Dispense into proper sample containers. This sampling/field blank will verify that proper field equipment decontamination has been performed.

13. After all samples have been taken from a given well, decontaminate the pH, conductivity, and temperature monitoring equipment. The used bailer shall be placed in an
appropriate contaminated equipment storage bag for transpor-
tation. Discard all contaminated gloves. appropriate contaminated equipment storage bag for transpor-

14, Replace protective inner cap and lock well.

tation. Discard all contaminated gloves.

14. Replace protective inner cap and lock wel

15. Ship samples to appropriate laboratory ac

Operating Procedures for sample packaging

7.3 Decontamination Protocol

The cleaning 15. Ship samples to appropriate laboratory according to Standard Operating Procedures for sample packaging and shipping.

7.3 Decontamination Protocol

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The cleaning procedures outlined in this section are-to be used by all personnel to clean sampling and other field equipment as well as sample containers prior to field use. Sufficient clean equipment and sample containers should be transported to the field so that the entire investigation can be conducted without the need for cleaning equipment in the field. Since this will not always be possible when using specialized field equipment, field cleaning procedures are included to cover these special problem areas.

These procedures are the standard operating procedures (SOP) for the Avco project; any deviation from them must be documented in field records and investigative reports.

Cleaning Materials

The cleaning materials referred to throughout this section are defined in the following paragraphs.

The laboratory detergent shall be a standard brand of phosphate-free laboratory detergent such as Sparkleen[®] or Liquinox[®]. The use of any other detergent must be justified and documented in the field log books.

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The nitric acid solution shall be made from ACS reagentgrade nitric acid and laboratory deionized water.

The standard cleaning solvent shall be pesticide-grade. isopropanol. Pesticide-grade acetone or methanol is not acceptable. Pesticide-grade methanol is much more hazardous to use than pesticide-grade isopropanol and its use is discouraged. Pesticide-grade hexane and petroleum ether are not miscible with water; therefore, these two solvents are not effective-rinsing agents. The use of any solvent other than pesticide-grade ispropanol for equipment cleaning purposes must be justified and its use must be documented in field log books and inspection or investigation reports.

Tap water may be used from any municipal water treatment system. The use of an untreated or non-potable water supply is not an acceptable substitute for tap water.

Deionized water is defined as tap water that has been treated by passing it through a standard deionizing resin colunn. Most commercial systems utilize a 5-micron prefilter followed by a mixed bed deionization unit to produce deionized \sim water. $\sqrt{ }$ The deionized water should contain no heavy metals or other inorganic compounds. Organic-free water is defined as tap water that has been treated with activated carbon and deionizing units. Usually, commercial units utilize a 5-micron prefilter, activated carbon unit, two mixed bed deionizing units (in series), a 0.2 micron post filter, and a postcarbon filter to produce organic-free water. Organic-free water should contain no pesticides, herbicides, extractable organic compounds, and less than 50 ug/1 of purgeable organic compounds as measured by a low \sim level GC/MS scan.

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The brushes used to clean equipment as outlined in the various paragraphs of this procedure shall not be of the wirewrapped type.

The solvent, nitric acid solution, laboratory detergent, and rinse waters used to clean equipment shall not be reused, except as specifically permitted.

Marking of Cleaned Sampling Equipment and Containers

All equipment and sample containers that are cleaned utilizing these procedures shall be labeled or marked with the date that the equipment was cleaned. Also, if there was a deviation from the standard cleaning procedures outlined in this section, this fact should be noted on the label.

When sample containers are cleaned and prepared, they should be cleaned in standard sized lots to facilitate the quality control procedures outlined in Section 7.3.

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Marking and Segregation of Used Field Equipment

Field or sampling equipment that needs to be repaired shall ^ be identified with a red tag. Any problems encountered with the ^ equipment and needed repairs shall be noted on this tag. Field equipment or reusable sample containers needing cleaning or repairs shall not be stored with clean equipment, sample tubing, or sample containers. Field equipment, reusable sample containers, disposable sample containers, and sample tubing that | are not used during the course of an investigation may not be containers, disposable sample containers, and sample cubing ones.

The mot used during the course of an investigation may not be

replaced in storage without being recleaned if these materials

............................ have been transported to an area of the Avco site where herbicides, pesticides, organic compounds, or other toxic ^ materials are present or suspected of being present.

Thave been transported to an area of the Avco site where

herbicides, pesticides, organic compounds, or other toxic

materials are present or suspected of being present

Decontamination of Equipment Used to Collect Samples of Toxic or Hazardous Waste

Equipment that is used to collect samples of known hazardous materials or toxic wastes or materials from hazardous in-process waste streams on this site, shall be decontaminated before it is returned from the field. At a minimum, this decontamination procedure shall consist of washinq with laboratory detergent and rinsing with tap water. More stringent decontamination procedures may be required, depending on the waste sampled (such

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as: additional solvent washing, pyrolysis, or the use of disposal equipment).

Proper Disposal of Cleaning Materials

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Ordinary wastewater will be disposed at the headworks of the facility treatment system. Any solvent used shall be collected and disposed of by allowing it to evaporate under a fume hood or be containerized and disposed of through an approved hazardous waste disposal contract. Similarly, spent nitric acid shall be collected and disposed of through the same disposal contract. These procedures apply whether the cleaning operations take place in a laboratory or in the field.

Use of Safety Procedures to be Utilized During Cleaning Operations

The materials used to implement the cleaning procedures outlined in this SOP can be dangerous if improperly handled. Caution must be exercised by all personnel and all applicable safety procedures shall be followed. At a minimum, the following precautions shall be taken in the lab and in the field during these cleaning operations:

- 1. Safety glasses with splash shields or goggles, neoprene gloves, and a neoprene laboratory apron will be worn during all cleaning operations.
- 2. All solvent rinsing operations will be conducted under a fume hood or in the open (never in a closed room).
	- 3. No eating, smoking, drinking, chewing, or any hand to mouth contact shall be permitted during cleaning operations.

Storage of Field Equipment and Sample Containers

All field equipment and sample containers shall be stored in a contaminant free environment after being cleaned using the procedures outlined in this section.

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Sampling Equipment Cleaned in the Field

The effectiveness of field cleaning procedures shall be monitored by rinsing field cleaned equipment with organic-free water and submitting the rinse water in standard sample containers to the laboratory for analysis (sampling/field blank).

Cleaning Procedures For Teflon[®] Or Glass Field Sampling Equipment Used For The Collection Of Samples For Trace Organic Compounds
And/Or Metals Analyses*

- 1. Equipment will be washed thoroughly with laboratory detergent and hot water using a brush to remove any particulate matter or surface film.
- 2. The equipment will be rinsed thoroughly with hot tap water.
- 3. Rinse equipment with at least a 10 percent nitric acid particulate matter or surface IIIm.
The equipment will be rinsed thoroughly with hot tap
water.
Rinse equipment with at least a 10 percent nitric acid
solution.**

** - Small and awkward equipment such as bottle lid inserts and well bailers may be soaked in the nitric acid solution

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When this sampling equipment is used to collect samples that contain oil, grease or other hard to remove materials, it pesticide-grade acetone or hexane to remove the materials and steam clean the field equipment before proceeding with Step 1. If the field equipment cannot be cleaned utilizing these procedures, it should be discarded.

- 4. Rinse equipment thocouqhly with tap water.
- 5. Rinse equipment thoroughly with deionized water.
- 6. Rinse equipment twice with solvent and allow it to air dry.
- g. wrap equipment completely with solvent rinsed aluminum foil to prevent contamination during storage and/or transport to the field.
- 8. Rinse the Teflon[®] or glass sampling equipment thoroughly with tap water in the field as soon as possible after ^ use.

Miscellaneous Equipment Cleaning Procedures

Nell Sounders or Tapes Used to Measure Ground Water Levels

- 1. Wash with laboratory detergent and tap water.
- 2. Rinse with tap water.

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- 3. Rinse with deionized water.
- Equipment should be placed in a Polyethylene bag or
wrapped with Polyethylene film to prevent contamination $\ddot{\bullet}$ during storage or transit.

. Ice Chests and Shipping Containers

All ice chests and reusable containers will be washed with laboratory detergent (interior and exterior) and rinsed with tap water and air dried before storage. In the event that an ice

water and air dried before storage. In the event that an ice

instead of being rinsed with it. Fresh nitric acid solution

should be prepared for each cleaning session.

chest becomes severely contaminated with concentrated waste or other toxic material, it shall be cleaned as thoroughly as possible and disposed of properly.

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Vehicles

All vehicles utilized should be washed at the conclusion of each field episode. This routine maintenance should minimize any chance of contamination of equipment or samples due to contamination of vehicles. It shall be the responsibility of the Project Engineer and/or field Investigators to see that this procedure is followed.

Preparation Of Sample Containers

General

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Bo sample container will ever be reused. All sample containers will be stored in their original packing cartons. \Box When packages of uncapped sample containers are opened, they will be placed in new plastic garbage bags and sealed to prevent contamination during storage. Specific precleaning instructions for sample containers are given in the following paragraphs.

40 ml Glass Vials for Water Samples (Purgeable Organic Compounds Analysis) and 250 ml Amber Glass Narrow Necked Bottles for Water Samples (TOX Analysis) with Teflon® Lined Septa;

1. Wash vials, bottles and jars, Teflon[®] liners and septa, and caps in hot tap water and laboratory detergent.

- 2. Rinse all items with deionized water.
- 3. Oven dry at 125°C overnight.

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- 4. Allow all vials, bottles, jars, liners, and septa to cool in an enclosed contaminant—free environment.
- 5. Seal vials, bottles, and jars with liners or septa as appropriate and cap.
- 6. Store vials, bottles, and jars in a contaminant free area.

One Liter Polyethylene Bottle for Metals and General **Inorganics**

- 1. Wash Polyethylene bottles and caps in hot water with laboratory detergent.
- 2. Rinse both with at least 10% nitric acid solution
- **i** 3. Rinse three times with deionized water.
	- 4. Invert bottles and dry in contaminant free environment.
	- 5. Cap bottles.

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6. Store in contaminant free area.

7.4 Sample Handling and Chain of Custody

An overriding consideration for environmental measurement data is the ability to demonstrate that samples have been obtained from the locations stated and that they have reached the laboratory without alteration. Evidence of collection, shipment, laboratory receipt and laboratory custody until disposal must be documented to accomplish this. Documentation is accomplished through a chain of custody record that records each sample and the individuals responsible for sample collection, shipment, and receipt. A sample is considered in custody if it is:

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- In a person's actual possession.
- In view after being in physical possession.
- Locked so that no one can tamper with it after having been in physical custody. ^

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In a secured area, restricted to authorized personnel.

Sample custody will be initiated by field personnel upon collection of samples. Documents specifically prepared for such purposes will be used for recording pertinent information about the types and numbers of samples collected and shipped for analysis. An esample chain of custody form is included as figure 7.3. The samples collected will first be brought to an on-site location for batching and paperwork checks. Labels and log information are checked to be sure there is no error in identification. Samples are packaged to prevent breakage or leakage, and labeled according to DOT regulations for transport by air as laboratory samples. These procedures are outlined in section 7.7. copies of forms will be maintained for the project record. Storage of samples by the laboratory will be under conditions specified fof the analyses to be performed. Samples partially used for analysis will be held for 60 days following report of the data before disposal. Archived samples will be stored until the end of the project, or shipped to another lab (for reanalysis if necessary).

chain of Custody Record Form

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Figure 7.3 is an example of the chain of custody form to be

used while collecting and shipping samples from the Avco site,

is the collecting and shipping samples from the Avoo site.

The chain of custody form shall be signed by each individual

who has had the samples in their possession. Preparation of the

chain of custody form shall be as f who has had the samples in their possession. Preparation of the chain of custody form shall be as follows:

- The chain of custody record shall be initiated for every sample by the person collecting the sample. Every sample shall be assigned a unique identification number that is entered on the chain of custody form. Samples can be grouped for shipment using a single form.
- The record shall be completed in the field to indicate . The record sharp be comproved
project, sampling team, etc.
- The person transporting the samples for shipment shall sign the record form as Transported By _
- Because the samples are to be shipped to the laboratory by commercial carrier, the chain of custody form shall shipping container, and the shipping container sealed prior to being given to the carrier.
- The commercial carrier's airbill shall serve as an extension of the chain of custody record between the \bullet final field custodian and receipt in the laboratory.

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- Upon receipt in the laboratory, the Quality Control Coordinator, or representative, shall open the chain of \bullet custody record, and sign and date the record. Any discrepancies shall be noted on the chain of custody form.
- If discrepancies occur, the samples in question shall be segregated from normal sample storage and the field \bullet personnel immediately notified.
	- Chain of custody records shall be maintained with the specific project files, becoming part of the permanent project documentation.

FIGURE 7.3

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Field Collection and Shipment

In addition to initiating the chain of custody form, field personnel are responsible for uniquely identifying (required for the chain of custody form) and labeling samples, providing proper filtration and preservation, and packaging samples to preclude breakage during shipment.

Every sample shall be labeled so as to include;

Project number.

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- Unique sample number.
- Sample description (such as well number and depth).
- Sampling data and time.
- Person obtaining the sample.
- Method of sample preservation/filtration, if any.

Samples must be placed in containers compatible with the intended analysis and properly preserved. Requirements for various analytical parameters with respect to the type of container, preservation method, and maximum holding time between collection and analysis have been presented in other sections.

Shipping containers are to be sealed prior to shipment, both during direct transport via field personnel as well as when commercial carrier is used. The only exception to this is if sufficient holding time exists so that the samples can be held in the field and it is necessary to re-ice the containers prior to or during transport.

As soon as field personnel are ready to transport samples from the field to the laboratory, they shall notify the

laboratory by telephone of the shipment. The estimated time of arrival at the laboratory should be given.

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Laboratory Sample Receipt

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Upon sample receipt, the QC Coordinator, sample custodian or his designee shall:

- Examine all samples and determine if proper temperature has been maintained during shipment. If samples have been damaged during shipment, the remaining samples shall be carefully examined to determine whether they were affected. Any samples affected shall also be considered damaged. It will be noted on the chain of custody record that specific samples were damaged and that the samples were removed from the sampling program. Field personnel will be notified as soon as possible that samples were damaged and that they must be resampled, or the testing program changed.
- Compare samples received against those listed on the chain of custody.
- Verify that sample holding times have not been exceeded.
- Sign and date the chain of custody form and attach the waybill to the chain of custody.
- List the samples in the laboratory sample master log-in book which contains the following information:.
	- Project identification number
	- Sample numbers

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- Type of samples
- Date received in laboratory
- Notify the Laboratory Manager of sample arrival.
- Place the completed chain of custody records in the project file.

Laboratory Storage of Samples.

The primary considerations for sample storage are:

Maintenance of prescribed temperature. Typically four degrees Celcius is required.

Preparing and/or analyzing samples within the prescribed holding time for the parameters of interest.

Placement of samples in the proper storage environment is the responsibility of the QC Coordinator, who should notify the Laboratory Manager or his designated representative, if there are any samples which must be analyzed immediately because of holding-time requirements.

7.5 Sample Containers and Preservation Requirements

Table 7.2 presents container requirements, preservation specifications and laboratory holding times to be adhered to during all sampling and analysis activities associated with this project.

7.6 Sample Packaging and Shipping

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In order to ensure safe, secure delivery of all collected samples to the analytical laboratory involved, the following packaging, labeling and shipping procedures have been prepared for this project. All procedures presented below are written to comply with applicable DOT regulations for transportation by surface and air.

Unless information collected during on-site activities indicates otherwise, all samples collected at the Avco site will be treated as non-hazardous aqueous liquids.

. Because of the expected non-hazardous nature of the collected samples, packaging and shipping criteria have been

designed only to maintain chain-of-custody protocol as well as prevent breakage of the sample containers.

Packaging and Shipping - Field Procedure

Place a signed, dated, chain of custody seal on each of
the bottles and vials in such a way that no bottles may
be opened without breaking the seal. $1.$ Place a signed, dated, chain of custody seal on each of be opened without breaking the seal.

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- 2. Wrap properly labeled and secured glass sample bottles and purgeable vials with two thicknesses of plastic bubble wrap. Place the wrapped containers into a watertight zip lock bag. Seal and label the outside of the ^ tight zip lock bag. Seal and label the outside of the
bag with the sample number or other field assigned bay with the sample humber of conce decade acception.
- 3. Put a layer of cushioning material (e.g., styrofoam board) in the bottom of the watertight shipping containers.
- 4. Place sample bottles, tops up, in the shipper. Arrange bottles such that glass bottles are surrounded by plastic bottles.

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TABLE 7.2

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AVCO WATER SAMPLES

TABLE 7.2 (Continued)

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- (5) Use pieces of rigid styrofoam as necessary to ensure that there will be no shifting of bottles during transport. transport.
- (6) Fill void space around and on top of the sample bottles i with ice cubes or chips that have been sealed in watertight plastic bags.
- (7) Seal chain of custody forms in a zip-lock plastic bag and tape securely to the inside of the shipper lid.
- (8) Close and lock or latch the shippers. Seal the space between the container body and lid with waterproof tape.
- (9) Apply several wraps of pre-printed chain of custody tape around the shipping containers perpendicular to the seal to assure that the lid will remain closed if the latch is accidentally released or damaged and to prevent tampering during shipment.
- (10) If the shipping container used is an all metal picnic cooler, tape the drain plug closed so it will not open.
- (11) Place a completed Federal Express Airbill on the lid of | the cooler including name, address and phone number of the receiving laboratory and the return address and phone number of the shipper.
- (12) Place a "This End Op" label on the lid and on all four | sides of the shipper.

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Samples will be shipped to the laboratory via Federal Express Priority 1 directly from the Avco site. Samples will be shipped directly to the appropriate laboratory.

For each shipment to the laboratory, a Federal Express air bill must be properly completed. An example of a properly prepared air bill to be used to ship samples to the contracted laboratory is shown as Figure 7.4. '

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FIGURE 7.4

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FEDERAL EXPRESS AIR BILL

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(1) As required, four raplicate analyses are to be performed.
02) lo be performed in the field.

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7.7 analytical Methods

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Table 7.3a summarizes parameters to be measured as well as specific analytical methods to be used during the analysis of the water samples collected at the Avco site.

Data Quality Objectives for Critical Measurements

Precision and accuracy goals for sampling and analysis depend upon the type of samples and analyses to be performed. For the sampling program at Avco, only groundwater monitoring well samples will be collected.

Quality assurance objectives in terms of precision, $\ddot{\bullet}$ $\ddot{\$ accuracy, and completeness are summarized in Table 7.3b.

The usefulness of sampling and analysis data is contingent upon meeting criteria for representativeness and comparability. Wherever possible, only reference methods and standard sampling procedures will be followed. The main objective of quality assurance activities is that all measurements be representative of the actual site conditions and, that all data resulting from sampling and analysis activities be comparable. The use of \cdots / accepted, published sampling and analysis methods as well as standard reporting units will aid in ensuring the comparability of the data.

7.8 Data Reduction, Validation and Reporting

Consistent data quality for this program will be obtained by the application of a standard data analysis and validation process designed to isolate spurious values. Data will be

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Table 7.3b

(1) Expressed as Relative Percent Difference except for TOC, TOX, pH

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Conductivity which will be Percent Relative Star 'd Deviation of quadruplicate measurements essed as % Recovery

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reviewed at a minimum by the analyst, his/her supervisor, and the QA Project Officer. Statistical tests will be applied to data to assess determinate and indeterminate errors. Determinate errors will usually be identified through the use of spikes, control charts and analysis of differing sample sizes. Indeterminate errors will be estimated in this program through statistical calculations and duplicate analyses as well as control charts.

Field Data Quality Reviews

Objective

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Action

Responsible Person

Laboratory Data Quality Reviews

Obiective

Action

Daily count of

number and nature of samples received versus number and nature of entries made in log. Mark "verified" on log.

Review and check off during each analysis. Forms

entries marked out

Daily review of calculated values against raw data

Review Weekly

Record values of replicate analyses and Control samples

Calibration cri teria in method reviewed and test calibration accep tance recorded.

provided by supervisor with non-required

values

1. Verify incoming data and sample complete ness

2. Verify all data forms completed

3. Manual data re duction procedures

4. Verify completeness of laboratory note books/bench sheets

5. Verify calibration criteria

6. Verify repeatability and accuracy

Engineering Data Quality Reviews

Obiective

Action

1. Assure completeness of field and lab data

Compare field and lab data forms against data list at each use and check-off

Responsible Person

Project Engineer

Laboratory Supervisor/

Analyst

Analyst

Analyst

Responsible

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Person

Sample Custodian

Analyst

Manager

7.9 Quality Control Checks ^

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All analyses performed in support of this program will be done using standardized laboratory procedures. The QC guidelines developed by Metcalf & Eddy make use of QC samples which are both known and unknown, or "blind", to the laboratory, calibration check samples, method blanks, field blanks, and replicate aliquot analyses.

Known QC samples called laboratory control standards (LCS) are prepared by adding known quantities of EMSL-Cincinnati or NBS Standard Reference or independently prepared stock materials to deionized water. The LCS are routinely used to establish that an instrument or procedure is in Control^ before analysis of samples begins. The analyst notes the LCS result in the instrument logbook and on the Control chart; the result must be within Control limits before sample analysis may proceed. A LCS is normally carried through the entire sample preparation and analysis procedure.

Unknown or "blind" QC samples (standards) are inserted in the sample batch in a solution not recognizable to the analyst to enable an estimation of the accuracy of the analytical procedure. These "blind" QC samples are made up in the same way as LCS; the only difference is that the analyst does not know which sample is a QC standard, or its true value.

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A calibration check sample is one of the working calibration standards that is periodically re-analyzed and the subsequent values used to demonstrate that the original calibration is still valid.

A method or reagent blank consists of deionized water carried through the entire preparation and analysis procedure. Analytical results are corrected for the method blank values before they are reported.

Analysis of "blind" replicate aliquots of actual samples or QC samples is done to enable estimation of the precision of the analytical procedure. These "blind" replicates are analyzed in addition to the replicates prescribed by the analytical procedure.

A filtration blank is generated in the field by the sampling team to demonstrate that the filtration process is not contaminating the field samples. Laboratory deionized water is carried through the entire filtration and preservation process. Analytical results obtained are taken into consideration during data interpretation activities.

Field blank samples serve to identify possible field and sampling contamination. A field blank is prepared by sampling fresh, deionized, analyte-free water with the field sampling

equipment in an identical manner as samples. For manually operated sample equipment, the deionized water is manually brought into contact with wetted portions of the sampling equipment using the standard sampling procedures. Field blanks are analyzed "blind" by the laboratory, and are preserved by the field team during the field activities.

A trip blank sample serves to identify contamination contributed from shipping, handling and storing the samples. A trip blank consists of deionized water placed in VOA vials as well as other bottles supplied by the laboratory. The trip blanks are taken into the field and are processed through all sample handling steps just like other samples. One trip blank is analyzed for each batch of samples sent-to the laboratory for analysis by each field team.

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Analysis of surrogate compounds during organics analysis is performed to monitor laboratory processing and purging efficiency of samples. The results of surrogate analyses are used to monitor laboratory performance and may also indicate sample matrix interferences when viewed in conjunction with laboratory 'spike' data.

Spiked samples are used as a measure of the' combined effects of precision and accuracy as well as to indicate how the sample matrix effects the recovery of analytes. The results can be used to monitor overall laboratory performance by calculating percent recoveries. Percent recoveries are reported and discussed with the analytical data.

Laboratory splits are samples which are divided into two or | more parts after collection. Each split aliquot is sent to a different laboratory for independent analysis o parameters, thus serving as an external QC sample. sivided into two or

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Laboratory generated blanks, duplicates, and standards are to be analyzed alongside samples to provide continuous quality control during the determination of trace constituents. The blanks are ^ analyzed to provide data on possible carry-over contamination of samples by the purging or digestion process and also provide background concentration levels in the reagents used during sample preparation and analysis. The duplicate analyses provide laboratory precision data while the certified standards provide a measure of accuracy.

7.10 Internal Quality Assurance Procedures

As applied to chemical analyses performed during this project. Quality Assurance is the demonstration and documentation of data quality. These procedures include"the recording of all quality control activities, and the assessment of analytical performance by $\begin{array}{c} \begin{array}{c} \end{array} \end{array}$ analysis of internal and external control and audit samples as discussed in previous paragraphs.

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Calculation of Data Qualify Indicators

The quality control activities undertaken during this project include ongoing activities to assure that measurement systems as ^ well as activities specific to a given site use evaluation are under control.

The ongoing quality control activities consist principally of the evaluation of data obtained from the following sample categories, whenever possible: (a) calibration standards, (b) working standards, (c) LCS (d) field replicates (e) field blanks (f) field samples (g) laboratory duplicates (h) laboratory spikes, (i) laboratory methods blanks, (j) trip blanks (k) laboratory split samples. Procedures used to evaluate this data will include in the contract of the contrac calculation of arithmetic means, standard deviations, relative percent differences for duplicate samples and comparison of differences between standards of spiked and experimentally determined values expressed as percent recovery. As noted in preceding sections, these data will be summarized in quality control tables. Additional tables presenting the results of the actual • field samples will additionally provide calculation of up to eight summary statistics including:

Number of LT detection limit values reported

- Total number of values reported
- Mean

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- **1** Median
	- . Standard deviation
	- Coefficient of variation
	- Minimum value
	- Maximum value

project-specific data evaluation procedures will be dependent ^ on the types and numbers of field samples actually collected. In general, it is likely that the overall objectives of the contenplated site evaluations will include comparison of ^ concentrations of one or more measurement parameters in areas of the site known to be previously "active" with measurements made in the "background" areas. For the most part, it is anticipated that the statistical procedures used for this work will be simple and straightforward, including, for example, calculation of limits of detection, limits of quantification, confidence intervals, and evaluation by least squares linear regression. In all cases, these procedures will be taken from EPA documents and manuals appropriate to the media under investigation. Overall guidance will be obtained from the EPA document "Calculation of Precision, Bias, and Method Detection Limit for Chemical and Physical Measurements" issued on ^ March 30, 1984 as Chapter 5 to the EPA Quality Assurance Manual.

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Equations for routing statistical measures to be used for such calculations are presented below. ^ ^

Precision. Precision will be determined by the analysis of replicate samples and will be expressed as the relative percent difference, which is determined according to the following equation:

 $RPD = \frac{Range}{Mean} \times 100$ where RPD = relative percent difference range = maximum value - minimum value $mean = average of duplicate values$

When quadruplicate measurements have been made, precision will be expressed as the standard deviation, s, which is determined according to the following equation:

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S = \sqrt{\frac{\sum_{i=1}^{n} X_i^2 - (\sum_{i=1}^{n} X_i)^2 / n}{n-1}}
$$

where $S =$ standard deviation = individual measurement result N^{\perp} = number of measurements

Relative standard deviation may also be reported. If so, it will be calculated as follows;

$$
RSD = 100^{\circ} - \frac{S}{\bar{X}} - \frac{S}{\bar{X}}
$$

where RSD = relative standard deviation, expressed in percent S = standard deviation

 \bar{X} = arithmetic mean of replicate measurement.

Accuracy. Accuracy will be estimated from the analysis of "blind" QC samples whose true values are known to the QA Project Officer. Accuracy will be expressed as percent recovery or as relative error. The formulas to calculate these values are:

. _ Measured Value Percent Recovery = 100 —True Value— _ mft Measured Value - True Value Relative Error — 100 True Value

Completeness. Completeness will be reported as the percentage of all measurements made that generate results judged to be valid according to project criteria compared to the total number of measurements made. The following formula will be used to estimate completeness:

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C = 100 \frac{V}{T}
$$

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where $C =$ percent completeness V = number of measurements judged valid T = total number of measurements

7,11 Performance and System Audits

An audit is a systematic check to determine the quality of operation of some function or activity. There are two basic types of audits: (1) laboratory performance audits in which quantitative data are independently obtained for comparison with routinely obtained data in the measurement system; or (2) system audits of a qualitative nature that consist of on-site review of conformance with quality assurance/control procedures in all laboratory, field sampling and chemical analysis activities.

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Laboratory Performance Audits

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An independent performance audit program involving preparation and analysis of QA samples may be conducted by the Quality Assurance Project Officer. The purpose of these QA samples is to provide an independent determination of problem areas in sample handling, analysis, and reporting. The program also provides data to document performance on the various measurement systems. Quality assurance samples are submitted blind to the laboratory for comparison of results. The QA samples may include spikes in samples previously analyzed, duplicate sample pairs, standards, blanks, and repeat analysis of filtrates. Some spikes are made in real sample matrices and others are prepared in certified organic free water. Field Sampling and Chemical Analysis Systems Audits

The QA Project Officer may schedule audits of field activities at various times to evaluate the execution of sample identification, sample control, chain-of-custody procedures, field documentation,

instrument calibration and field measurement and sampling operations. The evaluation is based on the extent to which the applicable standard operating procedures are being followed.

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Field documents pertaining to sample identification and control will be examined for completeness and accuracy. Field log books, field data forms and chain of custody forms will be reviewed to see that all entries are dated and signed and that the contents are legible, written in ink, and contain accurate and inclusive documentation of project activities. Because the log book, field data forms and chain of custody forms provide the basis for reports written later, they will contain only facts and observations. Language will be objective, factual, and free of personal interpretations or other terminology that might prove inappropriate.

The auditor will also check to see that chain-of-custody procedures are being followed and that samples are being kept in custody at all times and are secured in a manner to prevent tampering.

Sampling operations will be evaluated to determine if they are performed as stated in the project plan or as directed by the project manager. The auditor will check to determine that the appropriate number of samples are being collected, samples are placed in proper containers, and proper preservation, packaging and shipment protocols are being followed.

Field measurement activities will be evaluated to determine if they are performed according to specified guidelines. The auditor will spot check various instruments for proper calibration, the

frequency of calibration, and to ensure that the techniques utilized with these instruments are providinq accurate data.

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Laboratory Systems Audit

A laboratory systems audit may be performed to assure that the subcontractor laboratory is maintaining the necessary minimum levels of instrumentation and levels of experience of personnel, and that laboratory quality assurance/control procedures are in conformance with the specified requirements.

7.12 Corrective Action Procedures

corrective action procedures for this program will be initiated by the analytical personnel and their supervisors directly involved with implemepting the procedures presented herein. Quality control charts for daily instrument calibration and replicate analyses will be utilized to indicate the necessity for corrective action. control charts will be established for each procedure indicating upper and lower limits of three standard deviations as the acceptability ranges. Warning ranges are established at two standard deviations. At the point when the control charts show a determination outside the warning ranges, investigation as to the cause will be initiated. Any of the following events that occurs on the quality control chart will trigger corrective action:

- . Two consecutive determinations fall outside the upper or
- lower control limits.
Runs up--(seven consecutive determinations increasing in value)--or runs down (seven consecutive determinations
decreasing in value).
Three consecutive values fall above or below the warning limits (two standard deviations).

Corrective actions will also be initiated as a result of other QA activities which include performance audits, systems audits, and laboratory comparison studies.

The corrective action relative to the control charts is related more to precision than to accuracy. These charts give clues as to when some factor, generally of a procedural nature, is causing the results to drift or when an unexpected difference beyond the control limits occurs. Data within the upper and lower control limits of the control charts are well within the precision, accuracy, and completeness criteria.

7.13 References

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Laboratories, EPA-600/4-79-019, March 1979.
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SECTION VIII

VIII SOMMARY OF EXISTING ASSESSMENT MONITORING DATA

The third year of groundwater monitoring was conducted in the following fashion;

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Each quarter of analysis used samples taken from the seven original wells as well as the six new wells. Analysis was performed for the site-specific parameters specified in 1983 by Tom Stark of the CT DEP. The fourth quarter of analysis also included the six groundwater quality parameters specified under 40 CFR S265.92(b)(2) (chloride, iron, manganese, phenols, sodium and sulfate).

The third year groundwater summary report was prepared by IPC in January, 1987. In this report, as in previous reports, analytical results indicated a continuing presence of several pollutants in concentrations above the CPDWC. (See Appendix E for the complete groundwater analysis). Elevated levels of total and hexavalent chromium, total cyanide, trichloroethylene and tetrachloroethylene were detected in wells #1,2 and 3 which are adjacent to and downgradient from the sludge storage impoundments and well #5 which is adjacent to and downgradient from the equalization impoundment. However, a comparison of the indicator

parameter concentrations for the three years of monitoring of wells $f1 - 7$ indicates that the level of contamination in the local shallow groundwater aquifer has remained relatively || constant. The three year trends for site-specific parameters showed relatively constant levels of cyanide and chromium as ' well. We see that the contract of \mathbb{R}^d

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As indicated in Table 8.1, all of the 13 wells had at least one parameter at a level in excess of the CPDWC. However, IPG felt that analyses of samples from monitoring wells #8, 10 and 11 indicated relatively low levels of contaminants and that these wells consistently measured hydraulically upgradient of the hazardous waste management area. Based upon this data, IPG suggested that one or two of these wells be designated as upgradient and that all future quarterly samples from these designated wells have replicate samples and analyses done for the indicator parameters. With this data a baseline analysis can be developed for future statistical analysis.

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The report concluded that it can be assumed that the sludge and equalization surface impoundments are having an impact on the shallow groundwater system in the monitoring area. It also recommends that analytical information from well #10 be used to begin a statistical analysis report assuming this well continues with high standing water levels and can be designated as an upgradient well.

Aside from the obvious confusion as to which well is upgradient and the inability to perform a statistical analysis

based on that well data, the groundwater monitoring data can be used to begin assessing the rate and extent of contaminant migration at the Avco-Lycoming Site. An evaluation of the first year of assessment monitoring data is covered in Section IX of ℓ • this report.

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TABLE 8.1 Avco LYCOMING DIVISION Stratford, Connecticut

Chemicals Detected in Ground-Water Samples in Concentrations
Above CPDWC Limits

1/ Connecticut Public Drinking Water Code

SECTION IX

PROCEDURES FOR EVALUATING ASSESSMENT MONITORING DATA

This section describes the evaluation procedures to be used in order to meet the objectives of this assessment monitoring plan, more specifically, to estimate the rate and extent of $'$ migration and the concentration of constituents in the plume as required by CFR 265.93(d)(3)(iii) and 265.93(d)(4).

9.1 Listing of Data

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A list of all assessment analytical data shall be compiled in quarterly and annual reports and maintained at the r facility. All reports will be available to technical reviewers when a review of on-site records is called for. Reports will include information pertaining to quality control samples and standard quality control procedures as outlined in Section VII of this plan.

The listing of the groundwater analytical data shall identify the groundwater contaminant constituents, well number, date of sampling, time, the unit of measure, the limit of detection and the concentration of the contaminant. The listing shall be organized to allow quick reference to specific data values. The groundwater monitoring data shall be summarized and presented in tabular formats. Summary tables of each round of sampling shall be formatted to include the following summary statistics:

• Total number of values

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• Number of samples less than detection limit values

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• Mean

• Standard deviation

 \setminus Quality control data shall accompany each set of assessment monitoring data in the quarterly and annual reports. Quality control data shall be identified in all reports as specified in Section VII of this plan.

9.2 Extent of Tidal Fluctuations

The fluctuation of groundwater levels in unconfined aquifers adjacent to oceans is primarily a function of distance from the ocean. The further away, the less of an effect tides play on groundwater. Because the tidal drainage ditch extends the" effects of tides inland to the Avco-Lycoming facility, groundwater fluctuations could be noticed in any of the existing assessment monitoring wells.

To assess the extent of tidal influences on the uppermost aquifer at the Avco-Lycoming facility, a continuous time-series monitoring of groundwater levels over a complete tidal cycle is proposed. Water levels, in a minimum of eight of the existing groundwater monitoring wells, the tidal drainage ditch and the marine basin will be monitored using pressure transducers and a computer for data storage and retrieval. Each of the eight stations will be read simultaneously throughout the tidal cycle at predetermined time intervals. The time series developed during the tidal cycle will be plotted on a semi-logarithmic scale of water level change versus the log of distance from the

tidal drainage ditch to develop a predictive plot for of effect versus distance from the tidal ditch. Another plot will be developed for those wells affected by the tides, which presents the time during a tidal cycle when the well should be read to avoid tidal effects.

9.3 Development of Existing Assessment Monitoring Wells

To develop a graded filter around the well intakes of those wells experiencing siltation (1,2,3,4,5,6,47), a surge and pump technique is proposed. The method uses a surge block, slightly smaller than the existing well diameter, to force groundwater in and oat of the casing using a reciprocating motion. The fines that are drawn into the well are pumped out, and the process repeated until consistently clear groundwater is being pumped.

9.4 Aquifer Stress and Slug Tests

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An in-situ aquifer test will be conducted on wells 1, 3, 4, _L, 6, 7, 8, 9 & 11 in order to characterize the upper most aquifer. Hydraulic conductivity values obtained as a result of these tests shall be used in conjunction with a hydraulic gradient to estimate the rate of groundwater flow beneath the site. This information will be used to determine the rate of migration.

To determine in-situ hydraulic conductivity, a slug test will be performed on each well. The following protocol will be folloved:

- Remove a known volume of water from the well. Record the response in the well while allowing the water level in the well to reach equilibrium.
- Measure static water level.
- Introduce a slug of known volume. The slug of water will be the same water previously removed.

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Record the fall of the water level with time.

Water levels will be measured using an electronic water level indicator or a recorder with pressure transducers. The data will then be plotted on semi-logarithmic paper and analyzed using a basic time lag method. The following formula shall be used to calculate hydraulic conductivity:

$$
K = r^2 \ln(L/R)
$$
2 LTo

where: $r -$ well radius

R - radial distance between well center and undisturbed aquifer

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L - length of saturated screen

To- basic time lag in recovery rate

(after Freeze and Cherry, 1979 and Evorslev, 1951)

This method has the advantage of monitoring both how the aquifer responds to added and subtracted water. Analysis of both the recovery and slug data will provide a quality control check for the data.

9.5 Extent of Contamination

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In order to define the boundaries governing the extent of contamination, groundwater data from each sampling location shall be plotted to allow the evaluation of temporal changes in contaminant concentrations. Each plot shall consist of a horizontal axis, which represents time with year and month identified at intervals. The Y or vertical axis shall represent the concentrations of contaminants. The plots shall be constructed using the mean concentration values of constituents from the summary tables. One plot will be constructed for each well and for each sampling event. Existing plots based on first year data are illustrated in Appendix D.

Two additional plots shall be prepared in order to illustrate the most up to date extent of contamination. One plot will be a plan view of the site with contaminant concentration contours based on analytical values from each well. The second plot shall be a cross section of the aquifer, illustrating contaminant concentrations through a slice of the aquifer. The two plots will allow the horizontal and vertical extent of contamination based on available data, to be viewed. Comparison of similar plots in the future will allow the comparison and evaluations of spatial and temporal changes in contaminant concentrations.

9.6 Current Extent of Contamination

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The most mobile contaminants in groundwater, and that have also been detected in Avco assessment monitoring wells, are the volatile organics. While mounding and tidal effect have apparently spread volatile organics to upgradient assessment monitoring wells (wells 6, 7 and 12), analyses of the most recent sampling (October 17, 1986) have been plotted in both the horizontal and vertical planes and do not show any volatile organics.

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Figure 9.1 illustrates the total volatile organics concentrations (plan view) across the Avco facility. Figures 9.2 and 9.3 illustrate the concentration of total volatile organics based,on screen intervals at the shallow (8, 9, 10, 11, 12 and 13) wells and deep (1, 2, 3, 4, 5, 6, ϵ 7) wells. A similar method used for characterizing the vertical flow of groundwater (refer to Section 2) has also been used for characterising the vertical extent of contamination. The two (shallow and deep) horizontal plots (Figures 9.2 and 9.3) were used to develop cross sections which represent the vertical distribution of total volatile organics beneath the Avco-Lycoming facility. Figure 9.4 presents the locations of cross sections C-C and D-D', Figure 9.5 illustrate cross section C-C', and cross section D-D'. This information will be compared to 2nd quarter results (1987) in order to assess the extent and rate of migration.

A similar cross-sectional plot for chromium was not possible due to the lack of a sufficient number of data points illustrating "high" (higher than background) concentrations. A

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FIGURE 9.1 TOTAL VOLATILE ORGANICS, OCTOBER 1986

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-12znr. $-14 -16 -18$ $-20 \subset$ D D' $\mathbf{2}$ \bullet \dot{a} -2-4. đ. FEET \cdot 8 \cdot $-10 -12-$
 $-14 \frac{.16 - 1}{.18 - 1}$ $\overline{\mathbf{a}}$ $\frac{1}{100}$ $\frac{1}{200}$ $\frac{1}{400}$ $\frac{1}{500}$ 300 $\frac{1}{600}$ $\frac{1}{200}$ $\frac{1}{900}$ $\frac{1}{1000}$ 800 1100 $\frac{1}{1200}$ $\frac{1}{1300}$ ا
1400 1500 - 1
1600 FEET LEGEND **CONCENTRATION OF TOTAL VOLATILE
ORGANICS IN PARTS PER BILLION (ppb)** -100 APPROXIMATE WATER TABLE ELEVATION

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FIGURE 9.5 CROSS - SECTIONS (C-C' & D-D') OF VOLATILE ORGANICS IN GROUNDWATER

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plot of these few data points would yield a potentially inaccurate and misleading illustration of chromium concentrations.

9.7 Rate of Migration

The physio-chemical characteristics of the aquifer and the chemical constituents will effect the rate at which contaminants move through the aquifer. The site stratigraphy, natural and artificial recharge conditions, tidal influences, vertical hydraulic gradients, variations in hydraulic conductivity and the relative mobility of individual constituents will all influence the rate at which constituents move.

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Calculations of contaminant migration based oo groundwater flow rates will not be reliable without field verification because of potential differential transport rates among various classes of chemical constituents. Variations of transport rates are caused by several factors including;

- Dispersion due to diffusion and mechanical mixing;
	- Retardation due to adsorption and electrostatic interactions; and
	- Transformation due to physical, chemical, and/or biological processes.

Dispersion may result in the overall dilution of the contaminant and blurring at plume boundaries. Dispersion may result in a contaminant's arrival at a particular location before the arrival time computed solely on average rates of groundwater flow. Also, retardation processes can delay the arrival of contaaminants beyond that calculated by the average rates of groundwater flow. Relating rates of constituent migration to

rates of groundwater flow is appropriate for an approximation during the initial assessment phase. For this assessment, two methods shall be preformed to estimate and further quantify the rate of migration across the Avco facility.

First, information gained during the aquifer stress and slug tests shall be used to calculate an average pore velocity for groundwater flow across the site. The average pore velocity is an average linear velocity, 7, which is derived from Darcy's equation for saturated flow.

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where K is the saturated hydraulic conductivity, is the average horizontal gradient across the facility, and P_{ρ} is the effective porosity. The following assumptions apply:

- Source constituents are soluble and mobil in groundwater
- Flow occurs under saturated conditions along a single flow line (one-dimensional);
- Contaminants move advectively without dispersion.

The calculated average linear velocity, 7, represents the rate of groundwater flow through pore spaces only, which is an approximation of contamination migration rates.

The second method shall be employed semi-annoally in order to verify the groundwater flow velocity and help assess the rate of migration. Migration rates shall be determined by monitoringthe concentration of constituents over a period of time in monitoring wells. Because the wells are located both at the edge

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and the interior of the plume, subsequent analysis of the monitoring data will then provide a rate of migration, both of $\sqrt{ }$ the contaminant front as a whole and of individual constituents within the plume.

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This approach requires the collection of a time series of data of sufficient duration and frequency to gauge the movement of contaminants. The schedule of sampling outlined in Section 10 will provide adequate data to perform this task. The following method shall be employed:

- 1) Plot analytical data for constituents of concern (at a
minimum this should include total volatile organics) in minimum this should include total volatile organics) in the same manner as previously described in this section (see figures 9.1 to 9.5).
- 2) Resultant plots of each round of sampling shall be compared with the plot prepared from the previous round of sampling (6 months earlier).
- 3) Changes in distance between like concentration contours (i.e. the 100 ppb contour on October 1986 plot and the 100 ppb contour on the April 1987 plot) shall be measured. A resultant velocity or "rate of migration, based on the distance of movement between like concentration contours and the interval of time (number of days between sampling events), shall be calculated.
- 4) The rate will be compared with the groundwater velocity and a written discussion outlining agreement, differences and any anomalies between results of the two methods shall be incorporated in the second quarter and annual reports in a section entitled Current Extent and Rate of Migration.

SECTION X

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SCHEDULE OF IMPLEMENTATION

Field work outlined in Section 9.0 will be iaplemented and coapleted within the 1st quarter of 1987. Preliminary .indications are that this work will be started in late March of 1987.

Figure 10.1 illustrates the schedule of implementation to be exercised in carrying out this groundwater assessment monitoring plan. Milestones include quarterly sampling events, development of a comprehensive site evaluation for contamination and quarterly reporting dates.

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Denotes Period During Which Tesk
Will be Accomplished

Denotes Report Deliverable

FIGURE 10.1 SCHEDULE OF IMPLEMENTATION

APPENDIX A

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APPENDIX B.

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REPORTS OF EXPLORATION

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MAYOR **THE Y** in. $\overline{\mathbf{r}}$ $r₀$ $\overline{2}$ 12 S/M $2 - 2 - 8 - 6$ 2. $\mathbf{O}^>$ SPI $S₁$ OL. 12 $1 - 1 - 1$ $2²$ 8 ϵ $S₂$ Ø $\boldsymbol{\rho}$ L Come . X, ls i 14 12-37-44 24 14 12 \blacksquare \mathbf{S}^2 $\boldsymbol{\mathcal{L}}$ South $19 - 25 - 24$ 24 \prime la SM 2٥ ้ม 18 $\overline{\mathsf{S}}$ 0, GROUNDWATER DATA FIELD LOG OF BORING $\overline{}$ $\overline{1}$ $\overline{\mathbf{r}}$ \overline{m} \overline{r} Rosto <u>Sands</u> forue **D2X AT COMPLETING** ani 0 0,6 F. Said S/H $2c$ 0.4 $\overline{\mathbf{a}}$ FJand Gre 2.0 rgaile <u>?</u> **WORK COMPLETED** $\boldsymbol{\Lambda}$ E C **HALL** œ. C.Q ma. **HILL** ÷ CF Sau fin. \boldsymbol{z} $\overline{...}$ THE DISTRIBUTION Riser MOVING ON. DR STAND BY-**TOTAL.** $\iota_{\mathcal{U}}$ l **SHEETS** met d

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REPORT OF EXPLORATION

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AND
REMARKS SAMPLE DATA DRIVING
DESIGTANCE **MODIFIED SHIPLE LENTRE BOTH OF SAMPLE** \mathbf{m} \blacksquare $\overline{\bullet}$ $T = T$ C dans U 73σ 5_N $5 - 29 - 31$ 24 19 2.0 $₅FT$ </sub> $S:1$ $\mathbf{\hat{O}}$ \overline{m} $11 - 10$ 2^L 17 **AN** 4.6 $1, 6$ $s₂$ JG. Έ 74 $9,2$ 52 \mathbf{r} **BY/it** 24 تشاد $5 - 5 -$ 13.8 'Y G Sd \bullet برنكه 1B 24 SS 13.4 20.4 \bullet 24 25 22 25, \mathcal{S} 24 \mathbf{r} $\overline{\textsf{SC}}$ 23 $.5.8.$ E GROUNDWATER DATA FIELD LOG OF BORING T $\overline{}$ $\overline{}$ Es: CF Sed & Grovel らい $\overline{\mathcal{C}}$ o 130 $3<$ $70 - 695$ 切 .
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; 3.5 Full il fragge \mathbf{P} , \mathbf{C} ril $\overline{\rho_f}$ WORK COMPLETED $b\ddot{r}$ そん ۴٤ **BAL HALL** $\overline{23}$ \mathbf{m} $\frac{16}{121}$ pa. **HATA Lis** \cdot 1 $n f$ $^{\prime}$ \cdot $\frac{1}{2}$ $\mathcal{S}_{\mathcal{X}}$ \mathbf{z} لی دید \mathbf{r} $\overline{}$ " ,, ひり T i ist. Δ \mathcal{C}_{λ} 25 **THE DISTRIBUTION** MOVING ON. **DRILBIG.** STAND BY. **DETALISME** TOTAL. $\cos \epsilon = 8.5$ $\ddot{\cdot}$ \bullet .

MITCALF & IDDY ENGINEERS REPORT OF EXPLORATION Checchi \mathbf{B} -6 mercroe Bill HOLE NO. NCO- LYCOUING ACCT. ABOR. DREL CONTINUETOR Welt: ASSOC. Inc. ACCT. NO. 1569 LOCATION STRATFORD $\mathcal{C}\mathcal{T}.$ DRUIK THE DOZEE MTD Mosile B305 ELEVATION. 85 23 SEPT 140<u>0</u> $H \cup$ DATE START **SOLL** BIZE & TWE OF CASING FLT. August TO 10.6, CASING DATE COMPLETE 24 SEPT 85 $40 + 51 + 245$ $CLOUDY$ WATER. **WEATHER...** DRILLING PLUTO. **FIELD CLASSIFICATION** \bullet . SAMPLE DATA ARD
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Wax **TIME OF** $\overline{\bullet}$ **FROM** LC_1 . C_2 $14 - 60 + 10$ 14' 5ρ 12 0.4 2.0 730 SPT 51 $5f$ إ+4 سما -، 24 ľl $c.8$ 4,8 v 52 \mathcal{L} $35 - 3.72$ کا ا IL' 5_M 11.9 53 \mathbf{I} ى 10 انجون
ا $3 - 26 - 23$
- 2'1 12 $5\overline{v}$ $2₁$ 13.O IL Fi $. 14.4$ $52.74 - 12$ \circ 24^{\degree} 24.2 \mathbf{p}_i , J_i S 22.2 í2 \cdot \prime $7 - 5 - 6 - 9$ гЧ $\overline{\mathbf{I}^{\prime}}$ 3ం 56 28 **PA** $.5.6$ \mathcal{F} 2 tm TCF $2.1415H$ $\frac{16}{16}$ Ţ $\bm{\omega}$ aal $\overline{}$ GROUNDWATER DATA **MOTHE** PLELD LOG OF BORING mos[.] $\overline{\mathbf{r}^{\mathsf{H}}}$ THE **MIT** w /reduce Connote 0.B | a comuni 4.7 9.2435 $q.35$ let duck and loss of $|7, 2|$ kun 0.8 B_2 ulder ?.ວ $7,9$ mf fund Tr. Liet of Grand **WORK COMPLETED** 7.9 **HALL MA** HILL m. $\frac{1}{2}$ the i $blkb!$ sizel figure $B=10$ ϵ \mathcal{L} $\mathcal{D}'\sim$ / l' ± tan-bon $\mathcal{F}_{\mathbf{A}}$ બ્રિ $t_{rel,crit}$ $f.$ $f.$ f f f f f f f iÖ \mathbf{A} . н. н. 23.04 $\overline{}$ $\overline{\cdot}$ $\overline{\bullet}$ \rightarrow ید. پیرم کے پر پیدائش بدارہ TIME DISTRIBUTION لمفرادا $12 - 16$ 20 $F2:27$ MOVING ON. **DRILLING** برنم \mathcal{Z} bm STAND BY. REPARNI Little recoversie drive $\boldsymbol{3}$ b u t TOTAL. aren part HOLE NO. $B-G$ 10' Screen Protector Pite $'Soi'$ Samoles 51 Facer \mathcal{L} , \mathcal{L}

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REPORT OF EXPLORATION

METCALF & EDDY ENGINEERS REPORT OF EXPLORATION $B - B$ Bill Cluechi HOLE NO. *BORFLETOR* AVCO -CYCONING Wouti Assoc. INC. ACCT. ABOR. 1569 **TRACT** DART CO. ACCT. NO. STRATFORD $cr.$ LOCATION_ **DRS 1 74** DOZER Mro Mobile B305 ELEVATION. $oc\tau$ ک **85** 1300 DATE START. HSA CCT R.C 1500 J, **SCZE & THIPE OF CASING** DATE COMPLETE A/K ω 80 ° WEATHER DRILLING PLUID FIELD CLASSIFICATION
AND
REMARKS SAMPLE DATA **MARK** BOTH OF SAMPLE LENGTH
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IL DE % **TOTAL** \bullet mos F. Graves C. CF fan Cut. **kur SM** $3 - 3 - 5 - 5$ 24 $\overline{\mathcal{S}^{p}$ I4 $\overline{5}$ 2.0 \mathcal{O} $|G/2-2} \overline{\bm{u}}$ $\overline{4}$. 24 $L·1$ oily suell lla **SM S2** 5.4-2-2 0 S $\overline{\mathsf{S}}$ 8.2 \mathcal{D} .2 24 Tretty Aport H Attend **MeT** smbht $\overline{77.5}$ 14.3 74 γ_{n} - 1- 1 24 **S**4 ŧ <u>suitte</u> 24 $1 - 2 - 2 - 4$ 16.4 18.4 **PS.** S Eng \blacksquare \bullet 54 R. 24 20.5 $1 - 2 - 1 - 7$ 22.C V S and \overline{A} 24.6 SM) $26.5^{10.5}$ \overline{O} S ه ا 4ř र बा Sr/ud $2²$ 29.7 $\mathcal{U}% _{M_{1},M_{2}}^{\alpha,\beta}(\varepsilon)$ 33.7 58 ۹ţ $CMH + 1$ \overline{AB} \overline{AB} يبهرمنعا 37.79.34 24 33 35 S \mathbf{t} \mathcal{L} , b, β , \bullet **GROUNDWATER DATA** FIELD LOG OF BORING \overline{r} **HOTH** $\overline{}$ **MATE** Lit Silt, Some Franch इ.द ϵ 3.0 brn 1500 $13 - 1.35$ 0 AT COMPLETION \mathbf{r} Gravel arcy 3.0 K. 5.0 wffen le bh 5.5 oilu **WORK COMPLETED** \prime 75 $\frac{1}{2}$ $\frac{1}{2}$ œ F Im m. 带 $\frac{10}{100}$ m. SM \prime U L bløde 7_c 7.8 Brn **h&** Ye **GARE ZY** $f \in \mathcal{A}$ σ Im ما 1 و ud $J. h$ reco THE DISTRIBUTION 30 MOVING ON. $5!01$ 30 DRILLING Qu \bullet **STAIR BY.** esta di SM^ **TOTAL** <u>/ š</u> $\frac{1}{2}$ and $\frac{1}{2}$

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REPORT OF EXPLORATION.

 $CHGCHI$ **B10** BIL HOLE NO. **BISPECTOR** MCO-LYCOUWG DRU CONTRACTOR WELT ASSOC. Inc ACCT. ABOR. 1563 $\pmb{\tau}$ ACCT. NO. PORD ₹ \leq TM LOCATION. **DRILLER** Dozer Mid-Mobile 6305 ELEVATION. DATE START 25 SEPT. 85 **TYPE DRULL** ・ダロ 〇 HSA DATE CONDILITE 25 SEPT 8 3 ۰/5 SIZE & TWPE OF CASHING $\left(\mathcal{Z}_{2}\right)$ \bullet 80 $\boldsymbol{\mathsf{M}}$ \mathbf{r} lehe: WEATHER DRILLING PLUID. FIELD CLASSIFICATION SAMPLE DATA क्रमर BAYNE BEFTH OF SAMPLE LEMITH **MOONEY REMARKS** THE M \blacksquare ū $P200$ $\overline{}$ $5M$ 流すり 24 14 ST \mathbf{a} 51 າ **FAZ** $6 - 5 - 5 - 8$ 16 24 '،ج 52 \bullet $3₀$ $rac{2}{\sqrt{2}}$ anger Spor $9 - 11 - 10$ $5/4$ \circ 24 9 $\overline{\mathsf{S}^3}$ 12 7 \rightarrow / \bullet \mathcal{L} 70.∫ 24 24 2・1-2-1 12? 54 للمعتمر bon august is 많 **---2** 24 ماا " 'Ot $Q + 1$ ${I}$ से */o*ट्ट $\overline{2}y$ 24 $-2 - 2$ 9.S 56 ∣J \mathbf{r} rć $\overline{\mathsf{S}}$ $3 - 2$ 24 اد 23 レン・ ъ, $2₁$ \mathbf{r} Pt /oł 7.3 $\mathsf{Z}^{\,\boldsymbol{\mathcal{L}}}$ 16 21.5 24 58 \prime $\overline{\mathcal{E}}$ 16 26 Z_A . I-Z 2B \mathbf{L} 59 \mathbf{r} l Ο *BROUNDWATER DATA* FIELD LOG OF BORING **MOTH** $\overline{\mathbf{r}^{\mathsf{m}}}$ $\overline{\mathbf{m}}$ $T = T$ and fill transl Tan" fare! Ő 1. B AT COMPLETING and Land fiet. 5μ <u>Gay</u> 1.6 F. Gravel 5,0 "oily" Smelling Cf Sand \mathbf{y} black 5.0 5.2 WORK COMPLETED بمنذ 4 (rm **ه HALL** œ. **BLL** 帚 \mathbf{m} 빥 d Some F_{i} LΕ san 5.2 5.4 MF San 1 5.3 ſ. S .4 **H**LA re d 5. $\overline{}$ بوصص 14 دسهم ب F $\overline{1}$ \mathfrak{c}_{\bullet} rδ $Bm \sim Gm$ \mathbf{A} 0 TIME DISTRIBUTION Ô n. loL 30 **MOVING ON Signal** DRILLENG STAND BY. b... **BETAURE TOTAL** ا مبر
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Downy 1446 0730 - 1100 **MITCALF & EDDY** ENGINEERS $8 - 14$ (04) (5) BIU. CHECCHI **INSPECTION** HOLE NO. ACCT. ADDR. AUCO - LYCOMING WELT' ASSOC. INC. DRELL COMPRACTOR $ACT.$ NO. 1539 STRATEUR, CT. LOCATION **GRELER** THE DOZER MTD. Mobile 830S ELEVATION. DATE START ZG SEPT 85 SIZE & THRE OF CASING HSA DATE COMPLETE 26 SEPT 85 \mathcal{N}/\mathcal{A} CLOCKY つっ・ **WEATHER. DRILLING PLUID______ SAMPLE DATA FIELD CLASSIFICATION AND** BOTH OF SAMPLE LENSTH
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REPORT OF EXPLORATION

APPENDIX C

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APPENDIX D

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DETECTION MONITORING
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Stratford, Connecticut

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APPENDIX F

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GRAPHICAL PRESENTATION OF CHEMICAL PARAMETERS FOR ALL MONITORING WELLS

$(1984 - 1985)$

TABLE I - ANALYTICAL RESULTS OF 3RD YEAR SROUNDWATER MONITORING

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APPENDIX E

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GRAPHiCAL PRESENTATION OF. CHEMICAL PARAMETERS DETECTED IN ALL MONITOR WELLS (SECOND-TEAR PROGRAM)

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Groundwater Assessment Monitoring Plan Addendum May 1987

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Avco Lycoming TEXTRON

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Groundwater **Monitoring** Assessment Program

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Addendum, May 1987

Submitted by Metcalf & Eddy, Inc.

10 Harvard Mill Square Wakefield, Massachusetts

Mailing Address PO Box 4043 Woburn MA 01888-4043

May 18, 1987

Ms. Donna Ashford Avco Lycoming TEXTRON 550 Main St. Stratford, CT 06497-2452

Subject: Groundwater Monitoring Assessment Program Addendum, Connecticut DEP Order No. HM-358

Dear Ms. Ashford:

Metcalf & Eddy is pleased to submit this Addendum to complete the Groundwater Monitoring Assessment Program we submitted in March 1987. This report describes recent field activities and the results of the analyses to determine the influence of the tides on local groundwater levels and to estimate an average aquifer hydraulic conductivity. A groundwater well point was also installed adjacent to the equilization lagoon as a part of the field work, and this report also presents the well point location and its as-installed characteristics.

Very truly yours,

METCALF & EDDY, INC.

Carmine V. Di Filippo

Carmine V. DiFilippo Project Manager

Enclosure

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Telephone (617) 246 5200-Telex 6817067, MSTED (1) i- 8713781–Cable METEOD—Boston Hwifers, Paid Arc, San Bernarding, Inveloper Armigton Heights (L. Chicago, Coumput, Houston, Allarra, Branchourg, NJ, Bunche, e MD, Honolulu, San Juu

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- 2 Hydraulic Conductivity Results of Single Well Tests at Avco
- 3 Hydraulic Conductivity Ranges for Avco Soil Types

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- 2 Tidal and Groundwater Elevation Changes
- 3 Average Response Amplitudes Wells 4 Well Point
- 4 Response Amplitude Versus Distance from Tidal Drainage Ditch
- 5 Basic Time Lag Well 3 Slug Test 1

6 Basic Time Lag Well 3 Recovery Test

- 7 Basic Time Lag "Well 4 Slug Test
- 8 Basic Time Lag Well 4 Recovery Test
- 9 Hvorslevs Basic Time Lag and Variable Head Methods
- 10 Model of Flow to/from Tidal Drainage Ditch

I. INTRODUCTION

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Ketcalf & Eddy conducted a tidal influence study and aquifer permeability testing and installed a shallow well point at the Avco Lycoming TEXTRON facility in Stratford, Connecticut consistent with the objectives and protocol outlined in the Groundwater Monitor ing Assessment Program (GMAP), March 1987. The results of these θ field measurements, in conjunction with the procedures and objectives outlined in Section IX of the Groundwater Monitoring Assessment Program provide a comprehensive plan which will be followed to monitor and estimate the rate of groundwater flow at the facility. The following field monitoring was performed:

- , Consistent with Section 9.2 GMAP, M&E personnel monitored water levels at locations in and around the tidal drainage ditch during a 24 hour period, March 31 to April 1, 1987, in order to assess the extent of tidal influences on the aquifer at the Avco-Lycoming facility.
- . Consistent with Section 9.4 GMAP, M&E personnel performed slug/bail tests, April 1 to April 2, 1987, at locations on the facility in order to characterize the aquifer. Tests performed at monitoring well locations yielded hydraulic conductivity values which have been used to estimate rates of groundwater flow beneath the site.

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II. FIELD PROCEDURES AND PROTOCOL

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| six ditch at the Avco Lycoming TEXTRON facility on March 31, 1987. Six II. FIELD PROCEDURES AND PROTOCOL

MAFE began monitoring the tidal influence in and around the tidal

ditch at the Avco Lycoming TEXTRON facility on March 31, 1987. Six

locations were monitored from approximately 1530 (3: to approximately 2000 hrs. (8:00pm) on April 1 for total of 28.5 hours. The reduction in the number or monitoring locations during the tidal ' | cycle from eight locations to six locations was the result of an assumed | area of influence based on available information and the relative location of the monitoring wells to the coast. The results demonstrated that only those locations within or immediately adjacent to the tidal ditch are influenced by the tidal cycle.

A well point was installed adjacent to the tidal ditch and its postion and elevation were surveyed on April 1, 1987, see Figure 1. The well point has been included in Table 1 to be included in the semi-annual measurement of water level elevations.

Groundwater levels in monitoring wells 3, 4, 5, 13 and the well point ^ were monitored similtaneously and levels were recorded by an In-Situ SE200 computer. Pressure transducers, which monitored the water levels, were connected to the SE200 and recorded the levels every 10 minutes for the test duration. The results of the monitor ing of the tidal cycle were plotted with water level change versus the log of distance from the tidal drainage ditch. These plots were developed to estimate the effect of tides on groundwater flow with respect to distance from the tidal ditch.

Aquifer tests were conducted on monitoring wells to characterize

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the aquifer flow parameters. Slug or bail tests were performed on Wells 3 and 4 on April 2, 1987. The ability of some wells to respond very quickly to water level changes prevented a more extensive testing program. Results from the.tidal influence study did provide an additional estimate of the aquifer hydraulic conductivity and will be presented in the Results and Discussion.

Two tests were performed in each monitoring well by causing an instan taneous change in the water level in the monitoring well. A water level change was caused by inserting a 10 foot by 1-3/4 inch diameter (1.25 gallon) solid pipe into the well, which remained in the well until the water level reached equilibrium. When the slug (pipe) was removed, the recovery of the water level in the well (rising head) was recorded using a pressure transducer and the SE200 computer. After the wells reached equilibrium, a second test was performed by adding a volume of water to the well causing an instantaneous rise in the water level in the well. Again, the recovery of the water level in the well (falling head) was recorded with respect to time. Analysis of both the rising head and falling head phases of this test provided an quality assurance check of the results.

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III RESULTS and DISCUSSIONS

Tidal Influence

Fluctuation of groundwater levels in monitoring wells near the tidal estuary of the Housatonic River is a function of the distance from the estuary and the flow characteristics of the aquifer. An advantage of simultaneously monitoring water level changes due to tidal influences is that it allows an interpretation of the distance and time lag of tidal influence. Results of the monitoring conducted March 31 to April 1 indicate that the tidal cycle does, to a limited extent, influence groundwater levels, and therefore the flow of groundwater at the Avco-Lycoming TEXTRON facility. Plotted field data, see Figure 2, illustrates the influence tides have on groundwater levels By comparing the magnitude of the tidal influence in monitoring wells / located at different distances from the estuary an estimate of the extent of the tidal influence was made. Figure 3 presents the groundwater level plots from Well 5 and the Weil Point, which are 35 and 10 feet, respectively from the tidal ditch.

■ J

A plot of the average amplitude of groundwater response versus the log of the well distance from the tidal ditch is presented in Figure 4. Extrapolation of the data in Figure 4 shows that at a distance of approximately 80 feet beyond the tidal ditch, the groundwater response to the tides is essentially zero. This conclusion is supported by data from Wells 3, 13 and 4, which are located 160, 280, and 320 feet, respectively from the tidal ditch. The plots of groundwater levels in those wells, refer to

Figure 2, show no apparent tidal response.

Another result of this conclusion is that groundwater level data from Well 5 and the Well Point should be used recognizing that they are affected by the tides. In,determining horizontal gradients'in the aquifer, data from Well 5 and the Well Point should not be used. Groundwater levels in Well 5 and the Well Point, in conjunction with other well data, will be most useful in determining vertical gradients in the vicinity of the tidal drainage ditch.

Aquifer Tests

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For the analysis of the single well tests, Hvorslev's (1951) basic time lag and variable head methods were used. The basic time lag uses a plot of the lag of the well re'sponse over time to estimate a time. To, at which an equilibrium exists between the head measured in the well and the head in the adjacent aquifer, see Figures 5, 6, 7 and 8. Hvorslev demonstrated that the time to reach/equilibrium is inversly proportional to the aquifer hydraulic conductivity and can be calculated knowing the well construction details.

Hvorslev's variable head method is based on the same mathematical approach and can be used as a check on the basic time lag method. The variable head method uses two data points representing heads at two times during the well response. This method uses measured data rather than a statistical best fit of the data for the basic time lag. Figure 9 presents a brief summary of Hvorslev's method and the formulas for the basic time lag and variable head methods.

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Another advantage of monitoring the aquifer response to tidal ^ changes is the ability to use the data to estimate aqufier changes is the ability to use the data to estimate agailer
parameters. Using a mathematical model that preducts aquifer response to change in adjacent water levels, see rigure 10, allows Another advantage of monitoring the aquifer response to tidal

changes is the ability to use the data to estimate aquifer

parameters. Using a mathematical model that preducts aquifer

response to change in adjacent water

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Solving this type of problem requires finding a distance and corresponding time at which the response in the aquifer is zero. As was presented for the tidal influence study, see Figures 3 and 4, the response to tidal influences is almost zero beyond 80 feet from the tidal ditch. The time between tidal change and aquifer response can be estimated by noting the delay between well and tidal peaks in Figure 3, which shows a lag of 20 and 75 minutes for the Well Point and Well 5, respectively. For this analysis, it will be assumed that the aquifer, at a distance of 80 feet from the tidal ditch, will lag the tidal change by 75 minutes. ^

The conditions under which the flow equation in Figure 10 is being solved are at $x = 80$ feet and $t = 75$ minutes the response in the aquifer is zero or $s(x, t) = 0$. The right-hand side of the flow equation is a product of the tidal change and the error function term. Recognizing that the tidal charge does not equal zero, allows setting the error function term equal to zero. At this point the only unknowns are the aquifer transmissivity, T and specific yield, Sy. Solving for T/Sy yields a value of 43,207 square feet per day, and assuming a representative specific yield of 25 percent yields a transmissivity of 10,800 square feet per

6

day. Using the reported aquifer depth of 120 feet (Wilson, et. al., 1974) yields an aquifer hydraulic conductivity of 90 feet per day.

Results of the aquifer tests performed on the single wells at Avco are presented in Table 2. The data shows some variability not only throughout the aquifer but also in the different methpds of analyses used for single well tests. This is due to the nature of single well tests, which address only that portion of the aquifer adjacent to the well screen and the variable aquifer geology.

Hydraulic conductivities presented in Table 2 range between 0.4 and 23.1 feet per day. This range is in agreement with the hydraulic conductivities for soil types taken during boring exploration programs. Table 3 presents a listing of the soil types from GMAP Appendix A, and the expected range of hydraulic conductivities for these soils. The majority of soils, making up the Avco aquifer exhibit hydraulic conductivities in the range of 0.1 to 100 feet per day. Given the changing composition of the aquifer, with area and depth, and a majority of the soils being permeable sands, an aquifer hydraulic conductivity of 30 feet per day will be assumed for aquifer flow calculations.

Rate of Groundwater Flow

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Using a hydraulic conductivity of 30 feet per day, a horizontal gradient of 0.02, and an effective porosity of 0.25, the average horizontal groundwater flow rate at Avco would be 2.4 feet per day. Because of the effects of the tides on the aquifer, the rate of groundwater flow will experience cyclic changes.

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especially in the vicinity of the tidal ditch. As the tidal influence data showed, the extent of the influence is limited to ; within 80 feet of the tidal ditch, and would not be expected to effect the average flow rate. especially in the vicinity of the tidal ditch. As the tidal
influence data showed, the extent of the influence is limited to
within 80 feet of the tidal ditch, and would not be expected to
effect the average flow rate.

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Table 1 AVCO-Lycoming Groundwater Monitoring Wells

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•Groundwater measuring point is the protective casing. **Well Point adjacent to the tidal drainage ditent.

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HYDRAULIC CONDUCTIVITY RESULTS
OF SINGLE WELL TESTS AT AVCO TABLE 2.

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FIGURE 4 RESPONSE AMPLITUDE VERSUS DISTANCE FROM TIDAL DRAINAGE DITCH

FIGURE 5 BASIC TIME LAG WELL 3 SLUG TEST

FIGURE 6 BASIC TIME LAG WELL 3 RECOVERY TEST

FIGURE 7 BASIC TIME LAG WELL 4 SLUG TEST

FIGURE 9 HVORSLEVS BASIC TIME LAG AND VARIABLE **HEAD METHODS**

FIGURE 10 MODEL OF FLOW TO/FROM TIDAL DRAINAGE DITCH

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Appendix E-6

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$1990 - 1991$ **Assessment Monitoring Data**

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TABLE 3

VELL1 GROUNDWATER MONITORING ANALYTICAL DATA TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

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Notes: * All values are in ug/l unless noted otherwise U Indicates element was analyzed for but not detected. The number shown is the

detection limit. NA - Not Analyzed.

Table 4

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pH Notes: * All values are in ug/l unless noted otherwise

U indicates element was analyzed for but not detected. The number shown is the detection limit. NA - Not Analyzed.

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UEUL2 GROUNDWATER MONITORING ANALYTICAL DATA TEXTROH-LYCOHINC, STRATFORD, CONNECTICUT

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Notes: * All values are in ug/l unless noted otherwise

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UELL3 GROUHOWATER HOHITORINC AHALYTICAL DATA TEXTROM-LYCCHIHG, STRATFORD, COHHECTICUT

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Notes: * All values are in ug/l unless noted otherwise is the detection limit. NA - Not Analyzed.

TABLE 7

UELL3-0 GROUNDWATER MONITORING ANALYTICAL DATA TEXTROM-LYCOMING, STRATFORD, CONNECTICUT

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WELL4 GROUHDUATER HOHITORIHG AHALYTICAL DATA TEXTROH-LYCOHIHG, STRATFORD, COHNECTIOJT-

Notes: * All values are in ug/l unless noted otherwise U Indicates element was analyzed for but not detected. The number shown is the detection limit. HA - Mot Analyzed.

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TABLE 9

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GROUNOUATER HOHITORIMG AMALYTICAL DATA TEXTROM-LYCCHIMG, STRATFORD, CONNECTICXIT

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150 130 112 * 56
10 U 5 U 10 U 10 U Nickel Zinc 10 U 10 u 10 U 5 y Cyanide (Total) 10 U 1 U 10 U 10 U Cyanide (Amenable) Conventional Parameters ^ MA 233 1,552,000 MA Total Organic Halogens (TOX) MA 338 1,458,000 MA Total Organic Halogens (TOX) 482 MA MA 1,778,000 Total Organic Halogens (TOX) MA 178 MA 1,783,000 Total Organic Halogens (TOX) MA 29,900 MA 14,360 Total Organic Carbon (TOC) MA 30,800 MA 13,000 Total Organic Carbon (TOC) MA 33,500 13,040 MA Total Organic Carbon (TOC) MA 28,400 20,200 MA Total Organic Carbon (TOC) 700 900 1,000 850 Specific Conductance (umhos/cm) 700 900 820 Specific Conductance (Lnfios/cm) 950 700 900 850 950 Specific Conductance (unhos/cm) 710 900 820 \times 950 Specific Conductance (urhos/cm) 17.10 6.42 6.52 4.70 PH 7.10 6.41 6.53 4.80 PH 7.10 6.41 6.47 5.00 pH 7.10 6.47 6.41 5.08 pH

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Notes: * All values are in ug/l unless noted otherwise
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GROUNDUATER MONITORIMG ANALYTICAL DATA TEXTROM-LYCCHIHG, STRATFORD, CONNECTICUT

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/ TABLE 13

WELLS

GROUNDWATER HONITORIHG AHALYTICAL DATA TEXTRCH-LTCOMIHG, STRATFORD, COHNECTICUT

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GROUNDWATER MONITORING ANALYTICAL DATA
TEXTRON-LYCOHING, STRATFORD, CONNECTICUT

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WELL13 GROUNDWATER MONITORING ANALYTICAL DATA TEXTRON-LYCCMING, STRATFORD, CONNECTICUT

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Notes: * All values are in ug/l unless noted otherwise

U Indicates element was analyzed for but not detected. The number shown is the detection limit. NA - Not Analyzed.

TABLE 4
GROUNDWATER MONITORING ANALYTICAL DATA
TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

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B • Indicates the reported value is greater than the Instrument Detection Level, but less than the CRDL.
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> Notes: • All volatile organic, inorganic and conventional compound concentrations are in ug/l unless noted otherwise.

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B - Indicates the reported value is greater than the Instrument Detection Level, but less than the CRDL.

U - Indicates element was analyzed for but not detected. The number shown is the detection limit.

NA - Not Analyzed.

TABLE A

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SUMMARY OF DETECTED COMPOUNDS IN GROUND WATER MONITORING WELLS

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TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

Notes: - All inorganic compound concentrations are in ug/l (parts per billion), unless noted otherwise.

B • Indicates the reported value is greater than the Instrument Detection Level, but less than the CRDL.

* - Indicates duplicate analysis was not within control limits.

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TABLE A (Continued)

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SUMMARY OF DETECTED COMPOUNDS IN GROUND WATER MONITORING WELLS

TEXTRON-LYCOMING, STRATFORD. CONNECTICUT

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Notes: • All inorganic compound concentrations are in ug/l (parts per billion), unless noted otherwise.

B - Indicates the reported value is greater than the Instrument Detection Level, but less than the CRDL.

* - Indicates duplicate analysis was not within control limits.

TABLE A (Continued) SUMMARY OF DETECTED COMPOUNDS IN GROUND WATER MONITORING WELLS

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TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

MAY 14 · 16, 1991

Notes: " All inorganic compound concentrations are in ug/l (parts per billion), unless noted otherwise.

B - Indicates the reported value is greater than the Instrument Detection Level, but less than the CRDL.

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Notes: - All compound concentrations are in micrograms per liter (ug/l, or parts per billion), unless noted otherwise.
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Notes: - All volatile organic, inorganic and conventional compound concentrations are in ug/l unless noted otherwise.
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TABLE A (Continued) SUMMARY OF DETECTED COMPDUMDS IN GROUNDWATER HOMITORIHG WELLS TEXTRON-LYCOHING, STRATFORD, CONNECTICUT

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Rotes: \cdot All volatile organic, inorganic and conventional compound concentrations are in ug/l unless noted otherwise. B - Indicates the reported value is greater than the Instrument Detection Level, but less than the CRDL.

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Appendix E-7

Graphical Analysis of Quarterly Groundwater Monitoring Analytical Data

WELL1 SAMPLING DATA

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WELL3-D SAMPLING DATA

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1,2-TRANS-DICHLOROETHENE

Concentration (µg/l)

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WELL5 SAMPLING DATA

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1,2-TRANS-DICHLOROETHENE

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WELL7 SAMPLING DATA

WELL8 SAMPLING DATA

1,2-TRANS-DICHLOROETHENE

Concentration (µg/l)

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WELL9 SAMPLING DATA

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- WELL10 SAMPLING DATA

 $-1, 2$ -TRANS-DICHLOROETHENE

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Concentration $(\mu$ g/l $)$

WELL11 SAMPLING DATA

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WELL3-D SAMPLING DATA

TETRACHLOROETHENE

Concentration $(\mu$ g/l)

WELL4 SAMPLING DATA

TETRACHLOROETHENE

Concentration (µg/l)

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WELL5 SAMPLING DATA

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TETRACHLOROETHENE

Concentration (µg/l)

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WELL5-D SAMPLING DATA

TETRACHLOROETHENE

Concentration (µg/l)

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WELL6 SAMPLING DATA

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TETRACHLOROETHENE

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Concentration (µg/l)

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WELL7 SAMPLING DATA

TETRACHLOROETHENE

Concentration (µg/l)

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WELL8 SAMPLING DATA

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WELL9 SAMPLING DATA

Concentration (µg/l)

WELL10 SAMPLING DATA

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tetrachloroethene \Box

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Concentration (µg/l)

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WELL11 SAMPLING DATA

TETRACHLOROETHENE

 $(1/5n)$ c o o L. c 0) o c o o

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WELL12 SAMPLING DATA

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telrochloroelhene Linear Regression \Box

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\ O) a. c o o u Concen⁻

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Date

Jan-87 Feb-88 Apr-89 May 90

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WELL13 SAMPLING DATA

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Concentration (µg/l)

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WELL1-D SAMPLING DATA

TRICHLOROETHENE

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Concentration (µg/l)

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WELL1 SAMPLING DATA

TRICHLOROETHENE

 $(1/5n)$ c o o i. Concent

100 50 40- 30 ⊡ $20 10 5₅$ 4 $\overline{5}$ χ $2 1 -$ Aug-81 Sep-82 Oct-83 Nov-84 Dec-85 Jan-87 Feb-88 Apr-89 May-90 Date trichloroethene **Linear Regression** \Box

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WELL2 SAMPLING DATA

TRICHLOROETHENE

WELL3 SAMPLING DATA

 $(1/6r)$ c o 0 i. Concent

WELL3-D SAMPLING DATA

(I/Bri c o o L. c 0) u c o o

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WELL4 SAMPLING DATA

TRICHLOROETHENE

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Concentration (µg/l)

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WELL5 SAMPLING DATA

Concentration (µg/l)

WELL5-D SAMPLING DATA

TRICHLOROETHENE

(1/6r) c o Concentra

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WELL13 SAMPLING DATA

CADMIUM

 $(1/6n)$ c o Concentrat

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WELL12 SAMPLING DATA

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CADMIUM

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WELL11 SAMPLING DATA

Concentration (µg/l)

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Setelah selama sebagai sebagai sebagai sebagai selama sebagai selama sebagai selama selama selama selama selam

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WELLIO SAMPLING DATA

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WELL9 SAMPLING DATA

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WELL8 SAMPLING DATA

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Concentration (µg/l)

WELL7 SAMPLING DATA

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(I/^{Br}) C o o L. Concen⁻

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WELL6 SAMPLING DATA

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Concentration (µg/l)

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WELL5-D SAMPLING DATA

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CADMIUM

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WELL5 SAMPLING DATA

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WELL4 SAMPLING DATA

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CADMIUM

Concentration (µg/l)

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 $\sum_{\mathbf{Q}}$ c o Concentra

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WELL3 SAMPLING DATA

CADMIUM

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 $\begin{array}{cc} \mathcal{L}_{\mathcal{A}} & \mathcal{L}_{\mathcal{A}} & \mathcal{L}_{\mathcal{A}} \\ & \mathcal{L}_{\mathcal{A}} & \mathcal{L}_{\mathcal{A}} \\ & \mathcal{L}_{\mathcal{A}} & \mathcal{L}_{\mathcal{A}} \end{array}$ $\label{eq:1} \frac{1}{\sqrt{2\pi}}\frac{1}{\sqrt{2\pi}}\frac{d^2\chi}{d\chi^2}\, ,$ $\mathcal{L}^{\text{max}}_{\text{max}}$

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WELL2 SAMPLING DATA

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Concentration (µg/l)

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WELL1-D SAMPLING DATA

CADMIUM

 $(1/6n)$ c o o I. Concent

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WELL1 SAMPLING DATA

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WELL13 SAMPLING DATA

TRICHLOROETHENE

\ O) a c 0 Concentrat

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WELL12 SAMPLING DATA

Concentration (µg/l)

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WELL11 SAMPLING DATA

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WELL10 SAMPLING DATA

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WELL9 SAMPLING DATA

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TRICHLOROETHENE

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WELL8 SAMPLING DATA

TRICHLOROETHENE

WELL7 SAMPLING DATA

 $(n\beta\gamma)$ c o ncentrat

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WELL6 SAMPLING DATA

Concentration (µg/l)

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WELL4 SAMPLING DATA

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WELL3-D SAMPLING DATA

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WELL3 SAMPLING DATA

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WELL2 SAMPLING DATA

Concentration (µg/l)

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WELL1-D SAMPLING DATA

(1/⁶1) ration Concen⁻

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WELL1 SAMPLING DATA

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CYANIDE (TOTAL)

(I/^{Bri} c o o 'U Concen

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WELL13 SAMPLING DATA

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Concentration (µg/l)

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WELL11 SAMPLING DATA

CHROMIUM (TOTAL)

 $(1/5n)$ c o Concentra⁻

WELLIO SAMPLING DATA

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WELL9 SAMPLING DATA

CHROMIUM (TOTAL)

 $(1/6n)$ c o o I. c 0) u c o o

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WELL8 SAMPLING DATA

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 $(1/6n)$ c o o L. c 0) u c

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\overline{a} & \overline{a} \\
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WELL7 SAMPLING DATA

c o Concentra

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WELL6 SAMPLING DATA

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Concentration (µg/l)

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WELL5-D SAMPLING DATA

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WELL5 SAMPLING DATA

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 $(1/6n)$

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WELL4 SAMPLING DATA

CHROMIUM (TOTAL)

 $(1/6\pi)$ c o Concentra

WELL3-D SAMPLING DATA

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 $(1/5n)$ c o ncentra

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WELL3 SAMPLING DATA

WELL2 SAMPLING DATA

(ا/قبل) ration c 0 u c o o

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WELLl-D SAMPLING DATA

(1/⁶1) c o Concentra

WELL1 SAMPLING DATA

 $\label{eq:4} L_{\rm max} = 0.5$

 $C_{\rm{max}}$

CHROMIUM (TOTAL)

 $(1/6n)$ c o ncentra

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WELL13 SAMPLING DATA

CYANIDE (TOTAL)

 $\sum_{\mathbf{D}}$ **:1** c o Concentra

WELL12 SAMPLING DATA

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\ O) 3. c o Concentra

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WELL11 SAMPLING DATA

CYANIDE (TOTAL)

Concentration (µg/l)

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CYANIDE (TOTAL) $100 50 40 30⁻$ प्ति -ධ $20 10 -$ o ob o o o lo so o $5 \ddot{4}$ \mathcal{L} $2 1 Dec-85$ Jan-87 Feb-88 $Apr-89$ $May - 90$ $Sep-82$ $Oct - 83$ **Nov-84** $Aug-81$ Date Linear Regression Cyanide (Total)

WELL10 SAMPLING DATA

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Concentration (µg/l)

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WELL8 SAMPLING DATA

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CYANIDE (TOTAL)

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WELL7 SAMPLING DATA

CYANIDE (TOTAL)

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WELL6 SAMPLING DATA

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WELLS SAMPLING DATA

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(1/6r) ration « o c 0

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(1/6h) c o Concentra

Appendix E-8

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Summary of Quarterly Monitoring Statistical Data

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GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING. STRATFORD. CONNECTICUT

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WELL1 GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING. STRATFORD, CONNECTICUT

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NOTE: All values in μ g/I (ppb) unless noted otherwise.

TOX, TOC, Specific Conductance and pH are the average of four replicate samples for each sampling quarter.

Number of samples is total number of analyses exceeding method detection limits. For undetected compounds, 1/2 the detection limit was used in the calculations.

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GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY . TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

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WELL1-D GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

NOTE: All values in μ g/l (ppb) unless noted otherwise.

TOX, TOG. Specific Conductance and pH are the average of four replicate samples for each sampling quarter.

Number of samples is total number of analyses exceeding method detection limits. For undetected compounds, 1/2 the detection limit was used in the calculations.

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WELL2 GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING, STRATFORD. CONNECTICUT

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NOTE: All values in μ g/l (ppb) unless noted otherwise.

TOX, TOO, Specific Conductance and pH are the average of four replicate samples for each sampling quarter.

Number of samples is total number of analyses exceeding method detection limits. For undetected compounds, 1/2 the detection limit was used in the calculations.

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WELL3 GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING, STRATFORD. CONNECTICUT

WELL3 GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

All values in μ g/I (ppb) unless noted otherwise.

TOX, TOC, Specific Conductance and pH are the average of four replicate samples for each sampling quarter.

Number of samples is total number of analyses exceeding method detection limits. For undetected compounds, 1/2 the detection limit was used in the calculations.

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GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING, STRATFORD. CONNECTICUT

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WELL3-D

WELL3-D GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

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NOTE: All values in μ g/I (ppb) unless noted otherwise.

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TOX, TOO, Specific Conductance and pH are the average of four repiicate samples for each sampling quarter.

Number of samples is total number of analyses exceeding method detection limits. For undetected compounds, 1/2 the detection limit was used in the calculations.

WELL4 GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING. STRATFORD, CONNECTICUT

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WELL4 GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING, STRATFORD. CONNECTICUT

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NOTE: All values in μ g/l (ppb) unless noted otherwise.

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TOX, IOC, Specific Conductance and pH are the average of four replicate samples for each sampling quarter.

Number of samples is total number of analyses exceeding method detection limits. For undetected compounds, 1/2 the detection limit was used in the calculations.

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WELLS GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY
TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING, STRATFORD. CONNECTICUT

NOTE: All values in μ g/l (ppb) unless noted otherwise.

TOX, TOO, Specific Conductance and pH are the average of four replicate samples for each sampling quarter.

Number of samples is total number of analyses exceeding method detection limits. For undetected compounds, 1/2 the detection limit was used in the calculations.

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WELL5-D GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

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WELL5-D GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

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NOTE: All values in μ g/l (ppb) unless noted otherwise.

TOX, TOO, Specific Conductance and pH are the average of four replicate samples for each sampling quarter.

Number of samples is total number of analyses exceeding method detection limits. For undetected compounds, 1/2 the detection limit was used in the calculations.

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NOTE: All values in μ g/l (ppb) unless noted otherwise.

TOX, TOC, Specific Conductance and pH are the average of four replicate samples for each sampling quarter.

Number of samples is total number of analyses exceeding method detection limits. For undetected compounds, 1/2 the detection limit was used in the calculations.

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GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

NOTE: All values in μ g/l (ppb) unless noted otherwise.

TOX, TOO, Specific Conductance and pH are the average of four replicate samples for each sampling quarter.

Number of samples is total number of analyses exceeding method detection limits. For undetected compounds, 1/2 the detection limit was used in the calculations.

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TOX, TOC, Specific Conductance and pH are the average of four replicate samples for each sampling quarter.

Number of samples is total number of analyses exceeding method detection limits.

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For undetected compounds, 1/2 the detection limit was used in the calculations.

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GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING, STRATFORD. CONNECTICUT

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NOTE: All values in μ g/l (ppb) unless noted otherwise.

TOX, TOO, Specific Conductance and pH are the average of four replicate samples for each sampling quarter.

Number of samples is total number of analyses exceeding method detection limits. For undetected compounds, 1/2 the detection limit was used in the calculations.

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WELL10 GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

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WELL₁₀ GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING, STRATFORD, CONNECTICUT

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NOTE: All values in μ g/l (ppb) unless noted otherwise.

TOX, TOO, Specific Conductance and pH are the average of four replicate samples for each sampling quarter.

Number of samples is total number of analyses exceeding method detection limits. For undetected compounds, 1/2 the detection limit was used in the calculations.

WELL11 GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING, STRATFORD. CONNECTICUT

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WELL11 GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING. STRATFORD. CONNECTICUT

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NOTE: All values in μ g/l (ppb) unless noted otherwise.

TOX, TOC, Spocific Conductanco and pH are the average of four replicate samples for each sampling quarter.

Number of samples is total number of analyses exceeding method detection limits. For undetected compounds, 1/2 the detection limit was used in the calculations.

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NOTE: All values in μ g/l (ppb) unless noted otherwise.

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TOX, TOG, Specific Conductance and pH are the average of four replicate samples for each sampling quarter.

Number of samples is total number of analyses exceeding method detection limits. For undetected compounds, 1/2 the detection limit was used in the calculations.

GROUND WATER MONITORING ANALYTICAL DATA STATISTICAL SUMMARY TEXTRON-LYCOMING. STRATFORD, CONNECTICUT

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NOTE: All values in μ g/l (ppb) unless noted otherwise.

TOX. TOC, Specific Conductance and pH are the average of four replicate samples for each sampling quarter.

Number of samples is total number of analyses exceeding method detection limits. For undetected compounds, 1/2 the detection limit was used in the calculations.

Appendix E-9

40 CFR 264 Appendix IX Monitoring Parameters

TSD FACILITY STANDARDS

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PART 264 Appendix IX

APPENDIX IX-GROUND-WATER MONITORING LIST¹

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APPENDIX IX-GROUND-WATER MONITORING LIST¹-Continued

Chlorodibromometh

APPENDIX IX-GROUND-WATER MONITORING LIST¹-Continued

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TSD FACILITY STANDARDS

APPENDIX IX-GROUND-WATER MONITORING LIST¹-Continued

APPENDIX IX-GROUND-WATER MONITORING LIST¹-Continued

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TSD FACILITY STANDARDS

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APPENDIX IX-GROUND-WATER MONITORING LIST¹-Continued

PART 264 Appendix IX

TSD FACILITY STANDARDS

APPENDIX IX-GROUND-WATER MONITORING LIST¹-Continued

¹ The regulatory requirements pertain only to the list of substances; the right hand columns (Methods and PQL) are given for informational purposes only. See also footnotes 5 and 6.

² Common names are those widely used in government regulations, scientific publications, and commerce; synonyms exist for many chemicals.

³ Chemical Abstracts Service registry number. Where "Total" is entered, all species in the ground water that contain this element are included.

⁴ CAS index names are those used in the 9th Cumulative Index.

⁵ Suggested Methods refer to analytical procedure numbers used in EPA Report SW-846 "Test Methods for Evaluating Solid Waste", third edition, November 1986. Analytical details can be found in SW-846 and in documentation on file at the agency. CAUTION: The methods listed are representative SW-846 procedures and may not always be the most suitable method(s) for monitoring an analyte under the regulations.

⁶ Practical Quantitation Limits (PQLs) are the lowest concentrations in ground waters that can be reliably determined within specified limits of precision and accuracy by the indicated methods under routine laboratory operating conditions. The PQLs listed are generally stated to one significant figure. CAUTION: The PQL values in many cases are based only on a general estimate for the method and not on a determination for individual compounds; PQLs are not a part of the regulation.

Polychlorinated biphenyls (CAS RN 1336-36-3); this category contains congener chemicals, including constituents of Aroclor-1016 (CAS RN 12674-11-2); Aroclor-1221 (CAS RN 11104-28-2), Aroclor-1232 (CAS RN 11141-16-5), Aroclor-1242 (CAS RN 53469-21-9), Aroclor-1248 (CAS RN 12672-29-6), Arocior-1254 (CAS RN 11097-69-1), and Arocior-1260 (CAS RN 11096-82-5). The PQL shown is an average value for PCB congeners.

⁴ This category contains congener chemicals, including tetrachlorodibenzo-p-dioxins (see also 2,3,7,8-TCDD), pentachlorodibenzo-p-dioxins, and hexachlorodibenzo-p-dioxins. The PQL shown is an average value for PCDD congeners.

[52 FR 25946, July 9, 1987]

Appendix E-10

Table 4-1 **Sampling and Preservation** Procedures for Detection Monitoring

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TABLE 4-1

SAMPLING AND PRESERVATION PROCEDURES FOR DETECTION MONITORING^a

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Information of the Company

CALSUM 2011 POLICURES INTEABLE 3rd N(Continued) and discuss you are

SAMPLING AND PRESERVATION PROCEDURES FOR DETECTION MONITORING

areferences: Test Methods for Evaluating Solid Waste - Physical/Chemical Methods, SW-846 (2nd edition, 1982). Methods for Chemical Analysis of Water and Wastes. EPA-600/4-79-020. Standard Methods for the Examination of Water and Wastewater. 16th edition (1985).

b_{Container} Types:

 $P =$ Plastic (polyethylene)

 $G = Glass$

T = Fluorocarbon resins (PTFE, Teflon®, FEP, PFA, etc.)

 $PP = Polypropylene$

(Continued)

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TABLE 4-1 (Continued)

SAMPLING AND PRESERVATION-PROCEDURES FOR DETECTION MONITORING

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.SBased on the requirements for detection monitoring (§265.93), the owner/operator must is and leats a sufficient volume of ground water to allow for the analysis of four separate
Complicates. • ' ' allow for the track

-'fefrtppmg containers (cooling chest with ice or ice pack) should be certified as to the 4°c temperature at time of sample placement into these containers. Preservation of samples"^{the} requires that the temperature of collected samples be adjusted to the 4°C inmediately after collection. Shipping coolers must be at 4°C and maintained at 4°C upon placement of sample and during shipment. Maximum-minimum thermometers are to be placed into the shipping chest to record temperature history. Chain-of-custody forms will have Shipping/Receiving and \pm In-transit (max/min) temperature boxes for recording data and verification. $\frac{100 \text{ kg}}{3}$ and $\frac{100 \text{ kg}}{3}$ an

 $\sigma_{\rm max} \propto \sigma_{\rm max}$

e Do not allow any head space in the container.

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fuse ascorbic acid-only in the presence of oxidizing agents, \sim or

- shirlange mediting ^MaxTmum holding time is 24 hours when sulfide is present. Optionally,, all samples may be tested with lead acetate paper before the pH adjustment in order to determine if sulfide is present. If sulfide is present, it can be removed by addition of cadmium nitrate powder untrl a negative spot test is obtained. The sample is filtered and then NaOH is added to pH 12.

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