



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



BUREAU OF WASTE MANAGEMENT

April 15, 2003

APPROVAL

Mr. Carver Glezen
Triton Environmental, Inc.
741 Boston Post Road, Suite 101
Guilford, CT 06437

Re: Request for Approval of Alternative Surface Water Protection Criteria
80 Tower Avenue and Leonard Drive Site, Groton, CT

Dear Mr. Glezen:

The Connecticut Department of Environmental Protection (CTDEP), in conjunction with the Connecticut Department of Public Health (CTDPH), has reviewed your request for alternative surface water protection criteria for polyaromatic hydrocarbons (PAHs) dated November 25, 2002.

The request presents and details proposed alternative surface water protection criteria for use at this site. The proposed alternative surface water protection criteria do not include criteria sufficient to protect human health related surface water exposures. Therefore, the proposed criteria are rejected. However, CTDEP is recommending the use of the following criteria at the site. These criteria do not include any consideration for dilution. Please see the attached memo from Traci Iott for more details.

	Alternative Surface Water Protection Criteria (µg/l)
Acenaphthene	6.1
Acenaphthylene	49.2
Anthracene	0.73
Benzo(a)anthracene	0.027
Benzo(a)pyrene	0.014
Benzo(b)fluoranthene	0.49
Benzo(k)fluoranthene	0.49
Benzo(g,h,i)perylene	4.92
Chrysene	4.92
Dibenzo(a,h)anthracene	0.01
Fluoranthene	1.28
Fluorene	3.9
Indeno(1,2,3-cd)pyrene	0.49
Naphthalene	24
Phenanthrene	6.3
Pyrene	49.17


The requirements of Section 22a-133k-3(f)(2) of the Remediation Standard Regulations should be reviewed to determine the most appropriate method for evaluating compliance with the alternative surface water protection criteria provided above.

Nothing in this determination shall affect the authority of the Commissioner under any other statute or regulation, including, but not limited to, any authority to institute any proceeding, or take any other action to prevent or abate pollution, to recover costs and natural resource damages, and to impose penalties for violations of law. If at any time the Commissioner determines that the actions at the parcel have not fully characterized the extent and degree of pollution or have not successfully abated or prevented pollution, the Commissioner may institute any proceeding, or take any action to require further investigation or further action to prevent or abate pollution

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

If you have any questions regarding this determination, please feel free to call Ruth Lepley Parks at (860) 424-3923.

Sincerely,


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

Attachment

EP/rel

cc: Traci Iott, CTDEP
Bill Warzecha, PERD, CTDEP

Interdepartmental Memo
Department of Environmental Protection
Bureau of Water Management

To: Bill Warzecha

From: Traci Iott *Traci Iott*

Date: April 2, 2003

Re: Alternative Surface Water Protection Criteria - Tower Avenue and Leonard Driver Properties, Groton, CT

I have reviewed the request for alternative Surface Water Protection Criteria (aSWPC) for the Tower Avenue and Leonard Driver Properties in Groton submitted on November 25, 2002 by Triton Environmental Inc.. The development of the proposed aSWPC does not include criteria sufficient to protect human health related surface water exposures. Therefore, the proposal must be rejected. The following aSWPC (ug/l) may be used for this site:

Acenaphthene	6.1
Acenaphthylene	49.2
Anthracene	0.73
Benzo(a)anthracene	0.027
Benzo(a)pyrene	0.014
Benzo(b)fluoranthene	0.49
Benzo(k)fluoranthene	0.49
Benzo(g,h,i)perylene	4.92
Chrysene	4.92
Dibenzo(a,h,)anthracene	0.01
Fluoranthene	1.28
Fluorene	3.9
Indeno(1,2,3-cd)pyrene	0.49
Naphthalene	24
Phenanthrene	6.3
Pyrene	49.17

These values are the lowest of either the Water Quality Criteria contained in the Connecticut Water Quality Standards (12/17/2002), chronic aquatic life benchmarks (Toxicological Benchmarks for Screening Potential Contaminants of Concern for Effects on Aquatic Biota: 1996 Revision - Suter & Tsao, Oak Ridge National Laboratory) or EPA ECO Update (EPA 540/F-95/038).

The above criteria do not include any consideration of dilution. Based on the available information, consideration of dilution is not appropriate. The facility should review the requirements of Section 22a-133k-3(f)(2) of the Remediation Standard Regulations to determine the most appropriate method for evaluating compliance with the aSWPC provided above.