



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



October 25, 2001

John Burleson
BRAC Environmental Coordinator
Stratford Army Engine Plant
550 S Main St.
Stratford, CT

RE: Preliminary Remediation Goal Development, Stratford Army Engine Plant, Stratford

Dear Mr. ^{John}Burleson:

DEP has reviewed your letter of October 12, 2001, received by DEP on October 15, 2001, in which you request regulatory agency agreement with a statement of Preliminary Remediation Goals. I have the following comments:

The Preliminary Remediation Goals, as stated in your letter, appear to be consistent with the applicable requirements of Connecticut's Remediation Standard Regulations (RSRs) with the following qualifications:

1. Soil PCB pollution must also be remediated to any more stringent Federal TSCA requirements.
2. Some pollutants may require that two separate soil PRGs be established, due to differences in analytical techniques used to evaluate direct exposure and pollutant mobility.
3. Any alternative soil criteria or means of demonstrating compliance with such criteria at the site are subject to the Commissioner's approval under RSR Section 22a 133k-2(d).
4. Quantitative values calculated for soil vapor at the site are subject to the Commissioner's approval as an alternative criterion under RSR Section 22a 133k-3(c)(4)(B), if they are to be used for demonstration of compliance with the RSRs.
5. Use of industrial/commercial soil or volatilization criteria rather than residential criteria are only acceptable in conjunction with an Environmental Land Use Restriction conforming to the RSR provisions at a minimum.
6. Alternative groundwater surface water and volatilization criteria are subject to the Commissioner's approval under RSR Sections 22a 133k-3(b)(3)(B) and -3(c)(4)(B), respectively. Such demonstrations may separately address deep and shallow groundwater flow systems to the extent that these are discrete flow systems and the requirements of RSR Sections 22a 133k-3(f)(2) and -3(f)(3) are satisfied.
7. Remediation of the Tidal Ditch (outfall 008), Marine Basin, Tidal Flat Sediments, and contributing groundwaters shall also be a remediation goal to the extent such remediation is necessary to eliminate identified ecological or human health risks.

Connecticut's General Statutes section 22a-423 define pollution as "contamination or rendering unclean or impure" the waters of the State, without reference to any threshold concentration. While the PRGs may be used to define areas/volumes to be addressed in the FS, they cannot be used to limit the defined extent of contamination in the manner you propose in your letter.

Please note that the groundwater volatilization criteria apply to all groundwaters, regardless of depth, since the groundwater table is present within 15 feet of the building.

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Please clarify if you intend to use the lower of the soil vapor criteria, as indicated, or intend to use the most appropriate criteria of those specified.

Your letter requested a response on the same day it was mailed. I presume that this was a typographical error. I have endeavored to provide a timely response to facilitate the FS process. If you have any questions please contact me.

Sincerely,



Kenneth Feathers
Supervising Sanitary Engineer
Permitting, Enforcement and Remediation Division
Bureau of Water Management
860-424-3770

CC: Meghan Cassidy, EPA
RAB