

HRP Associates, Inc.

Creating the Right Solutions Together

March 14, 2012

Ms. Claire Foster
Remediation Division
Connecticut Department of Energy & Environmental Protection
79 Elm Street
Hartford, CT 06106

**RE: REQUEST FOR APPROVAL OF RECOMMENDATIONS & SITE CLOSURE;
263 MYRTLE STREET (FORMERLY 37 BOOTH STREET), NEW BRITAIN,
CONNECTICUT (HRP #ING0085.GW)**

Dear Ms. Foster:

Per your request, HRP Associates, Inc. (HRP) has prepared this letter requesting the approval of proposed recommended alterations to the scope of work at the above-referenced property.

CURRENT STATUS

HRP documented the current status of groundwater conditions at the site in the *September 2011 Semi-Annual Groundwater Quality Monitoring Report & Proposed Changes to Groundwater Monitoring Program* document dated November 18, 2011. Within this document HRP concluded that compliance with Connecticut Department of Energy & Environmental Protection's (CT DEEP) Remediation Standard Regulations (RSRs) was achieved in all site monitoring wells with the exception of monitoring well MW-4a. Compliance was demonstrated by four quarterly monitoring events followed by two semi-annual sampling events with concentrations in groundwater below applicable RSR criteria.

An additional three quarterly monitoring events are required (with acceptable results) at MW-4a to demonstrate compliance. Following receipt of acceptable results from these sampling events, RSR compliance will have been achieved at all site monitoring wells and the groundwater monitoring program will then be discontinued following CT DEEP's written approval. HRP also concluded that the light non-aqueous phase liquid (LNAPL) within the former remedial area RA-6 (and historically present within monitoring well MW-6) had been removed to the maximum extent practicable.

HRP conducted an inspection of the facility on March 6, 2012 and interviewed the site contact, Bob Palczewski, regarding the current operations. The site occupant currently utilizes the site for the production of frozen ice cream cakes and, based on the site inspection and interview, does not generate hazardous waste and is not operating as an "Establishment". HRP confirmed this information through a search of available records using Environmental Database Resources, Inc.'s (EDR) On-Demand database.

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The site contact confirmed that there are no underground storage tanks on the property. The only storage tanks on site include two, small (approximately 100 gallons), diesel aboveground storage tanks with secondary containment, which are utilized only for the operation of the emergency lighting and fire pump. Both of these ASTs and the surrounding ground surface were observed to be in good condition and free of any staining.

Based on the EDR On-Demand database search for the property, the interview with the current site contact (conducted on March 6, 2012) and Mark Moriarty, a representative of the City of New Britain (the former site owner from 1995-2007) conducted on March 12, 2012, no releases were identified to have occurred to site soil and/or groundwater since the Form III filing in 1995. Notes from the interviews and site visit are attached. Therefore, the current monitoring program appears appropriate to represent both past and present uses of the property.

REQUEST FOR APPROVAL OF RECOMMENDED SCOPE OF WORK

Based on the results of the September 2011 groundwater monitoring event and a review of additional information provided by the facility, it is HRP's opinion that investigation of the property has been performed in accordance with all applicable standards and guidelines; and that all remediation of any pollution caused by any release at the parcel have been completed in accordance with the RSRs, with the exception of the completion of post-remediation groundwater monitoring, natural attenuation monitoring, or the recording of an Environmental Land Use Restriction, pursuant to the remediation standards. Also, payment of the remediation oversight fee of \$32,750 was submitted to the CT DEEP on February 7, 2012.

HRP is recommending the following scope of work for the property:

- Reduce the scope of the groundwater monitoring program to sampling monitoring well MW-4a on a quarterly basis (for three quarters with sampling events in March, June and September 2012) and analyzing for VOCs only;
- Continue bi-monthly product gauging at monitoring well MW-6 until compliance monitoring is complete at MW-4a (anticipated following the third sampling event, scheduled for September 2012).

We respectfully request CT DEEP's review and approval of the proposed recommended changes to the scope of work for this property.

If you have any questions or require additional information, please feel free to contact us at (860) 674-9570.

Sincerely,

HRP ASSOCIATES, INC.



Stefanie A. Kreipovich
Senior Project Geologist



Scot Kuhn, LEP
Senior Project Manager/Team Leader

Attachment

cc: Dave Sordi, Ingersoll Rand (*via email*)
Jason Rudnick, Cakemaker, LLC
Bob Palczewski, Rich's Food Products
Peter Hill, CT DEEP
David Ringquist, CT DEEP

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Notes: Celebration Foods, 263 Myrtle St, New Britain

* Purpose of site visit to determine if any releases have occurred on the property and if Celebration Foods is operating as an Establishment.

• On Site @ 7:30 AM - meet w/ Bob Palczewski (Regional Project Engineer)

> Facility opened Feb. 2008

> operates as production facility of ice cream cakes

> all city/municipal utilities (no well or septic)

> no environmental permits, environmental liens or violations

> floor drains connected to sanitary sewer

> the building does not have a basement

> no grease traps or oil/water separators on site

> Raw Materials include:

- food products (ice cream mix, cookies, etc.)

- general cleaning products

↑ stored in ² designated areas w/ secondary containment

> Wastes - No Hazardous wastes generated

- general refuse & recycling

- limited volume of waste oil from compressors

↑ disposed of once a year

↑ stored in compressor room in secondary containment

> No USTs

> 2 small (100 gal or less) ASTs (diesel)

- one exterior - no staining, tank in good condition

- one inside fire suppression room - no staining, tank in good condition

> 2 nitrogen ASTs - filled daily for refrigerant (located outside)

Notes:

- > Site building in good - new condition
 - no visible cracks or staining on floors
- > facility utilizes "closed-loop" ammonia refrigeration system
- Interviewed Bob Palczewski throughout site walk
 - > no releases have occurred to soil/grandwater
- Off-site @ 8:45 am

* Conclusions from Site Visit & Interview

- ↳ site does not appear to be operating as an Establishment
- ↳ site does not generate haz. waste
- ↳ no releases to soil/gw have occurred

Notes:

3/12/2012

Call to: Mark Moriarty - City of New Britain

Re: if any releases occurred ~~at~~ the property
located at 263 Myrtle St while owned by
the City of New Britain (1995-2007)

- Mark Moriarty is not aware of any releases that
occurred on the property between 1995 and 2007