Environmental, Health, and Safety
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March 26, 2015

Ms. Claire Foster
Environmental Analyst
Connecticut Department of Energy and Environmental Protection
Remediation Division, Bureau of Water Protection and Land Reuse
79 Elm Street
Hartford, Connecticut 06106

RE: SUMMARY OF INGERSOLL-RAND'S PROPOSED APPROACH FOR THE FORMER TORRINGTON COMPANY FACILITY, 263 MYRTLE STREET, NEW BRITAIN, CONNECTICUT

Dear Ms. Foster,

Thank you again for your time to meet with me and my team on February 11, 2015 to help us identify options for closing this remediation case. It was a pleasure meeting with you and David Rehnquist and learning about the CT process and the challenges you face from a regulatory perspective. The purpose of this letter is to present Ingersoll-Rand's understanding of possible approaches to site closure identified during our meeting. The approaches summarized below represent our collective understanding of the options identified during our meeting and we hope they are consistent with your understanding of the available options. If they are not, please let us know.

- Approach 1: The regulation states "...demonstrating that no building can reasonably be expected to be constructed over the subject groundwater..." Demonstrate that a lower standard (1.6 ppb) doesn't apply because: a) a structure cannot be built on the potentially affected portion of the down gradient property currently used for parking; and b) the creek beyond is a gaining stream.

- Approach 2: Continue to develoip the rationale for our current thinking that concentrations in groundwater will be reduced to the applicable volatilization criteria (1.6 ppb) within 5 years. We understand this this would require the Commissioner's approval and that it is the Agency's interpretation that this exemption is to be demonstrated for a "plume" as opposed to a single point of compliance. This approach would require the collection of additional supporting data to gain approval including, but not limited, to:

    - Use of a model to provide statistical validity for decreasing trends (Mann-Kendall or other);
    - Collection of data to support both trend and fate & transport models including hydraulic conductivity, geochemical parameters, and a minimum of two additional rounds of groundwater monitoring;
    - Use the additional data to provide a conceptual site model that would strengthen the argument for the vinyl chloride trends observed; and
    - Restatement of findings from Approach 1 that would support this approach further.

- Approach 3: Continue monitoring on some periodic basis until RSR's have been met for four (4) consecutive seasonal events, or until the 5-year decreasing trend has been substantiated to the CT DEEP's satisfaction.

- Approach 4: The regulation specifically states "...it has been documented that best efforts have been made to ensure that each owner of any parcel of land or portion thereof overlying such polluted groundwater records an environmental land use restriction which ensures that no building is constructed over such polluted groundwater...". Work with the downgradient owner to consider an Environmental Land Use Restriction (ELUR) or Activity and Use Limitation (AUL) to ensure residential development could not occur, thus justifying the use of the higher standard (52 ppb). This may also require the stream evaluation discussed in Approach 1.

There are several common elements that support the approaches outlined above and we will pursue them so that we can attempt to close this matter. These include:

- Researching possible zoning and building limitations for the parking area downgradient of MW-4a with the Town of New Britain (Approaches 1, 2, and 4);
- Approaching the downgradient property owner regarding an ELUR or AUL or to futher understand their current and future site development plans (Approaches 1 and 4).
- Collecting stream gauging data to support that the stream beyond the downgradient parcel is a gaining stream (Approaches 1, 2 and 4); and
- Collecting a minimum of two rounds of groundwater data from a subset of site wells to expand the data set for model use (Approaches 2 and 3). Samples will be collected using low flow sampling techniques, and field parameters will be measured. In addition, select samples will be analyzed for halogenated volatile organic compounds (HVOCs) and geochemical data (total and dissolved iron and manganese, sulfate, nitrate, chloride, dissolved gases [methane, ethane, and ethane]). These data will be used to demonstrate that natural attenuation is occurring within the plume footprint, and that the degradation pathway is complete.

The work described above has already been initiated, and we hope to work through this process within the first half of 2015. Please confirm we have captured the essence of our discussion appropriately and feel free to contact me or my team if you have any concerns or questions. You can reach Jessica Kruczek or Scot Kuhn of HRP at (860) 674-9570 or me at (704) 990-3250. We will update you with new information as we work through the plan identified above and may request another meeting to gauge the likelihood of approval of the selected approach before finalizing any deliverables or corresponence. Thank you again for your time.

Sincerely,

Mike Goldstein
Global Remediation and Transaction Manager

Cc: S. Kuhn, HRP (via e-mail)
J. Kruczek, HRP (via e-mail)
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