



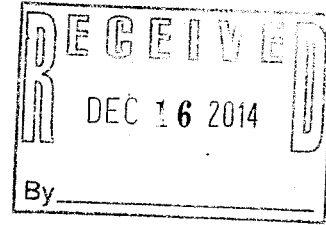
December 12, 2014

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Mr. Michael Goldstein
Global Remedial and Transaction Leader
Ingersoll Rand
80-E Beaty Street
Davidson, North Carolina 28036



RE: Request for Exemption of Volatilization Criteria
Former Torrington Company Facility
263 Myrtle Street, New Britain
REM ID 11041

Dear Mr. Goldstein:

The Remediation Division of the Connecticut Department of Environmental Protection (the Department) has reviewed the report titled, *Groundwater Quality Monitoring Report for the Third Quarter 2012 through Third Quarter 2013, Former Torrington Company Facility, 263 Myrtle Street (Formerly 37 Booth Street), New Britain, Connecticut, REM ID#1141 (HRP #ING0093.GW)*, dated December 17, 2013 (the Request). The Request was prepared on your behalf by Eric J. Boswell of HRP Associates, Inc. The Request was submitted in conjunction with the filing of a Form IV certification pursuant to Section 22a-134a(c) of the Connecticut General Statutes (CGS).

The Request proposes to utilize the exemption from volatilization criteria where natural attenuation will, within five years, reduce the concentration of volatile organic substances (VOCs) to a concentration equal to or less than the applicable volatilization criteria, pursuant to the Remediation Standard Regulations (RSRs), Section 22a-133k-3(c)(5)(A)(ii) of the Regulations of Connecticut State Agencies.

The explanation and calculation presented in the Request does not sufficiently demonstrate that the concentration of VOCs will be less than the applicable volatilization criteria within five years. The following are comments from the Department's review of the above request for the site.

1. The formula used to calculate a rate of attenuation assumes no continuing contribution of polluted groundwater to the system. Because the deeper groundwater beneath well MW-4a is more contaminated than the shallow groundwater, it may be acting as a continuing source of contamination through mixing and diffusion. This is not taken into account in the formula presented.
2. The formula also assumes no changes in environmental conditions over time. When the site was redeveloped in 2007, disturbances to the soil may have affected groundwater flow and infiltration. This may cause higher concentrations in the years immediately following construction. The decrease in concentration shortly after that time may have been from the decrease in infiltration on the site in addition to natural attenuation.
3. The calculations for predicted pollutant concentrations did not include any confidence intervals or other statistical methods of determining reliability of the predicted trends. The trend for the most recent years does not appear to be consistent with earlier years, but this is not addressed.

4. Data from former monitoring wells RMW-13 and RMW-29 should be included in the presentation of groundwater trends over time. MW-4a and 4b were installed close to the former location of these wells before they were destroyed.
5. The report did not present sufficient groundwater data to demonstrate an understanding of the seasonal and dimensional conditions of the entire plume. Instead data from just one well with an exceedance of criteria was used.
6. The report did not present sufficient groundwater data to demonstrate an understanding of the seasonal and dimensional properties of the hydrology, such as hydraulic conductivity, flow rates, vertical flow components, etc.

Based on the information presented by your LEP to support the above referenced Request, the Department finds that the model presented is not detailed enough to demonstrate that groundwater will meet the applicable volatilization criteria within five years. The comments included above address the most important deficiencies but others may be present. If you have any questions pertaining to this matter, please contact me at (860) 424-3709 or Claire.Foster@ct.gov.

Sincerely,



Claire Foster
Environmental Analyst
Remediation Division
Bureau of Water Protection and Land Reuse

c: Scot Kuhn and Jessica Kruczek, HRP Associates, Inc. 197 Scott Swamp Rd., Farmington, CT 06032