



**COMPLETION OF
REMEDY SELECTION (CA400)
AND
REMEDY CONSTRUCTION (CA550)**

To: Edgar Davis, EPA Region 1
From: Jing Chen, CT DEEP 
Through: David Ringquist, Sandy Brunelli - CT DEEP


Date: August 10, 2012

Re: The Miller Company
99 Center Street (a.k.a. 275 Pratt Street)
Meriden, Connecticut
EPA ID No. CTD001147974

Rem ID No. 7363

The Miller Company (Miller) facility located at 99 Center Street (a.k.a. 275 Pratt Street) in Meriden, Connecticut has achieved the "Remedy Selection" (CA 400) and "Construction Complete" (CA 550) Corrective Action milestones. This site is subject to the requirements of the Resource Conservation and Recovery Act (RCRA) Corrective Action due to its former operation of two metal hydroxide sludge drying beds (lagoons). The site is also subject to Connecticut's Property Transfer Program due to the sale of the property to Duerer Corporation in 2000. Miller signed as the Certifying Party for the 2000 property transfer and maintains the Corrective Action liability for the site.

Miller formerly manufactured tin ware, candle holders, lamp screws, and candle springs. Currently, the site is operated as a rolling mill for specialty copper-based strip alloys. The primary contaminant of concern at this site is metals (copper, zinc, and cadmium) that are present in the site soil and groundwater.

Miller has completed investigation and public noticed final remediation plans in the Meriden Record-Journal on August 13, 2011. Remedial measures included excavation and off-site disposal of waste and contaminated soils, implementation of an Environmental Land Use Restriction (ELUR) at the site, and monitored natural attenuation (MNA) of the metals plume in groundwater. Soil remediation along with demolition of many buildings at the site and the closure of the former sludge drying beds and clarifier were conducted between 2001 and 2003. Additional soil excavation was conducted at the bag house area in December 2011. Confirmation soil samples showed that these areas are now in compliance with the Remediation Standard Regulations (RSRs), Section 22a-133k-1 through -3 of the Regulations of Connecticut State Agencies (RCSA) and physical remediation at the site is complete at this time. Post remedial monitored natural attenuation and monitoring of surface water are on-going. In addition, an ELUR will be applied to the site.

A Screening Level Ecological Risk Assessment (SLERA) was submitted to the Department in August 2005, and revised on April 11, 2011, June 8, 2011, and April 9, 2012. A memo generated by the Remediation Division dated July 5, 2012 (see attached) describes the chronology and decision making process for determining that the ECO is complete and that no further action is warranted at the site at this time in regard to ECO.

Achievement of these goals does not necessarily mean that final clean-up levels or other requirements have been achieved as required by the RSRs.

MEMO

July 05, 2012

TO: Patrick F. Bowe Director *PB 11 JULY '12* Remediation Division
THROUGH: Robert Bell Assistant Director Remediation Division
Jan Czczotka *JWC* Assistant Director Remediation Division
David Ringquist *DR* Supervisor, Central District Remediation Division
FROM: Jing Chen *JC* Environmental Analyst II Remediation Division
RE: ECO, The Miller Company Site at 99 Center Street in Meriden

The Miller Company site (the site) is located at 99 Center Street in Meriden. The site is located within the downtown area of Meriden and is surrounded by mixed residential, commercial, and industrial properties. The groundwater quality in the site area has been classified GB.

The site consists of approximately 22 acres of land and currently has eight (8) industrial buildings. The site manufactured candle holders, lamp screw and candle springs in the mid-1800's and has been used as a rolling mill for copper-based strip alloys since mid-1920's.

The site is subject to the Resource Conservation and Recovery Act (RCRA) Corrective Action program and the Connecticut Property Transfer Program for a property transfer filing in 2000. The site was delegated to a LEP (Haley & Aldrich) for overseeing the investigation and remediation at the site. Between 2001 and 2003, the site went through a significant re-development. Many older buildings were demolished and impacted soil was removed for offsite disposal. One such remedy that involved soil removal was conducted during RCRA closure of two sand filter beds. A RAP was previously public noticed and implemented. All active remediation at the site is completed except for the following groundwater issues.

A groundwater plume, found in the vicinity of the bag-house area, contains levels of copper, zinc, and cadmium that exceed RSR surface water protection criteria. This plume is migrating offsite toward the culverted Jordan Brook described below. In December 2011, additional contaminated soil was removed from the bag-house area as this area was identified as a potential continuing source that contributes to the metal plume. Since this remediation, the concentrations of copper and zinc in the most downgradient monitoring well have slightly decreased.

Jordan Brook is located in an underground culvert that historically flowed through the site and was relocated in the 1990s to along the southern property boundary, creating a former stream bed that is thought to be a conduit for groundwater flow in the vicinity of the metals plume described above. Jordan Brook discharges to Harbor Brook, which is located approximately 1,800 feet away from the site. The majority of Jordan Brook flows underground, through a culvert.

A Screening Level Ecological Risk Assessment (ECO) was originally submitted to the Department in 2005 and was revised in 2011 and 2012 in response to the comments provided by Planning and Standards

Division (P&S). Haley & Aldrich concludes that ECO risk at the site is low because the majority of Jordan Brook is underground, therefore ecological receptors would not be present for a metals plume to harm. H&A recommends surface water and groundwater monitored natural attenuation (MNA) of the plume as the remedy. However, it was P&S' opinion that MNA is not recommended and the metals plume should be remediated. This remediation should be described in the upcoming Remedial Action Plan.

Based on the most recent groundwater and surface water sampling results and given that the majority of the Jordan Brook flows underground with low or no aquatic receptors, both Jing Chen and David Ringquist, at this time, concur with Haley & Aldrich's recommendation to use surface water and groundwater MNA as the remedy for the metal plume, therefore no further physical remediation would be required. We recommend that surface water MNA initially focus on the stream water quality at the point that the brook daylights and ecological receptors would be expected to be present. This will help assess whether there is a current impact on these organisms. It is anticipated that the concentrations of metals in groundwater will continue to decrease as a result of the bag house remedy described above. Further evaluation of the metal plume will be required if the levels of metals show an increasing trend in either surface water or groundwater in the future, and an alternative remedy may be considered at that time.