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File No. 1579-01

North Stamford Concerned Citizens for the Environment, Inc.
c/o Bruce A. Hubbard, P. C.
730 Third Avenue, 25th Floor
New York, New York 10017

Attention: Joanna Manley-Moore, President

Subject: City of Stamford Properties
Scofieldtown Area
North Stamford, Connecticut

Ladies and Gentlemen:

At your request, ALTA Environmental Corporation (ALTA) has reviewed selected environmental issues relating to properties owned by the City of Stamford in the Scofieldtown Area in North Stamford, Connecticut. The following selected items warrant additional evaluation, at a minimum, although ALTA acknowledges that we may not be aware of all of the work that has been completed in connection with these items.

Bartlett Arboretum Property - 151 Brookdale Road

The Bartlett Arboretum property was transferred from the State of Connecticut to the City of Stamford in 2002. The Phase I Environmental Site Assessment for this property recently completed by TRC indicates that the property may have been an “establishment” as defined in the Connecticut’s “Property Transfer Act (CGS 22a-134 *et seq.*) due to the removal of 13 drums containing 390 pounds of “Waste Poison B Liquid” classified as hazardous waste U061 (which corresponds to 4,4-DDT) from the site on September 8, 1986. This waste quantity exceeds the hazardous waste generation rate threshold of 100 kg per month, which if exceeded, causes a property or business operation to be defined as an “establishment”. However, the actual generation rate is not known by ALTA and should have been determined to the extent possible based on completion of due diligence. The generator of the hazardous waste was listed as Bartlett Arboretum (University of Connecticut) at 151 Brookdale Road in Stamford, Connecticut. Additional hazardous wastes generated at the Bartlett Arboretum may have been transferred to the nearby University of Connecticut facility, as discussed below. As such, it appears that the 2002 transfer of the property may have been subject to the Property

Transfer Act, and if so, the appropriate form filing (e.g., the Form III and Environmental Condition Assessment Form (ECAAF)) should have been made at the time of the transfer. The Form III would have identified a certifying party responsible for investigating the property in accordance with prevailing standards and guidelines, and remediating the establishment in accordance with the DEP Remediation Standard Regulations (RSRs) found in Regulations of Connecticut State Agencies (R.C.S.A.) 22a-133k-1 through 22a-133k-3.

TRC completed limited characterization of soil quality in the area of and beneath the education building/former laboratory building at the Bartlett Arboretum in association with the demolition of the building and construction of a new education building. TRC submitted a total of ten soil samples for laboratory testing, including eight samples (B1 through B5) collected in May 2010 prior to the demolition of the building, and two soil samples (SS-1 and SS-2) collected from beneath the floor slab during building demolition in July 2010. The laboratory testing results for these ten samples indicated the presence of chlorinated pesticides (e.g., chlordane, 4,4-DDE, 4,4-DDT, heptachlor epoxide) and arsenic significantly above one or both of the pertinent soil remediation standards for these compounds (i.e., residential direct exposure criteria and GA pollutant mobility criteria) in four of the samples. These samples include soil sample SS-2 collected beneath the floor slab adjacent to a floor drain in the basement of the building that contained 16,000 µg/kg of 4,4,-DDT. The Phase I report indicates that this floor drain discharged to the original septic system. TRC reportedly collected two soil samples near this septic system. The Phase I also indicates that excavation of the area around the former floor drain was completed, and that TRC collected confirmatory soil samples from this area and from beneath the area planned to be excavated for the new building. The analytical results for the two samples collected adjacent to the septic system, around the floor drain excavation, and beneath the proposed building were pending at the time the Phase I was completed.

In May 2010, TRC completed limited soil sampling in the proposed excavation area surrounding the existing education building/former laboratory building at the Bartlett Arboretum. One surficial soil sample (B4 collected from 0 to 2 ft. below grade approximately 30 ft. north of the building) contained chlordane at a concentration of 8,700 µg/kg. Importantly, the level of total chlordane detected in the sample indicated that soil from that release area may have required handling as a RCRA hazardous waste upon generation, and that the generator was required to complete a hazardous waste determination that should have evaluated whether or not such soil exhibited a hazardous waste characteristic (e.g., Toxicity Characteristic Leaching Procedure (TCLP) chlordane levels exceeding the TCLP threshold of 0.03 mg/l for chlordane under 40 CFR 261.24), or contained a listed hazardous waste (e.g., discarded commercial products including certain pesticides). Note that RCRA regulations require that such an evaluation be completed on waste as generated (e.g., impacted soil from a given release area), and not after such soil has been mixed/stockpiled with other soil from outside that release area or

from other release areas (i.e., which can result in dilution of the hazardous waste). It is ALTA's understanding that excavated soil from the area of the proposed building was placed in rolloff bins, tested and handled off site by Environmental Services, Inc. (ESI). However, ALTA is not aware if an appropriate hazardous waste determination was completed, whether additional soil investigations were completed to delineate soil zones that should have been handled as hazardous waste, or if all of the excavated soil was disposed of off site as a hazardous waste.

Soil has been excavated from this area to construct the new building and its expanded septic system, and the concrete foundation walls of the new building have been poured. It appears that the excavation and construction work were completed without evaluating potential release areas throughout the proposed excavation area, and the degree and extent of soil and groundwater impacts associated with any discovered release areas (e.g., the pesticide release area by the floor drain contamination, and the release area to the north of the building), and without developing a remedial action plan (RAP). A RAP should have been developed after completing sufficient Phase II/III soil and groundwater investigations, with consideration of the investigative findings and proposed future use of this public area.

Scotfield Magnet School Property - 641 Scotfieldtown Road

The property at 641 Scotfieldtown Road was reportedly owned by the State of Connecticut from circa 1959 to 1998, at which time it was sold to the City of Stamford. The property was operated by the University of Connecticut. ALTA completed a review of hazardous waste manifests for the 641 Scotfieldtown Road property, which indicated numerous shipments of hazardous wastes from the property, including shipments totaling 900 pounds of hazardous waste in March 1991, 30 cubic yards of hazardous waste in June 1991, 51 gals. and 7 pounds of hazardous waste in March 1995, and 889 pounds of hazardous waste in August 1997. It appears that the property may have been an "establishment" due to the probable generation of over 100 kg of hazardous waste per month. In addition, if the property was receiving hazardous waste generated at a different location (e.g., the Bartlett Arboretum also operated by UCONN), the site would similarly meet the definition of an "establishment". Sufficient due diligence should have been completed to discern the hazardous waste generation rates associated with this property prior to its 1998 transfer. It is more likely than not that the 1998 transfer of the property should have been subject to the Property Transfer Act, with the appropriate form filing (e.g., the Form III and Environmental Condition Assessment Form (ECAAF)) being required at the time of the transfer.

Scotfield Manor - 614 Scotfieldtown Road

In January 2010, the DEP responded to a report of drums at Scotfield Magnet School and the Scotfield Manor properties, which are owned by the City of Stamford. The report was

assigned Case No. 2010-419 by the DEP Emergency Response and Spill Prevention Unit. Drums of oily liquids, containers of several types of chemicals, and bags of the pesticide methoxychlor were removed from these sites by ESI for off-site handling as hazardous or Connecticut-regulated wastes. ESI also completed sampling and testing of drum contents and a total of seven presumably surficial soil samples at selected locations. The soil samples (designated as Ground 1 through Ground 6 at Scofield Manor, and Ground 7 at the Scofield Magnet School) were submitted for testing for volatile organic compounds (VOCs), extractable total petroleum hydrocarbons (ETPH) by the Connecticut method, and polychlorinated biphenyls (PCBs). VOCs were not detected in any of the samples. ETPH was detected in the soil samples, with the ETPH concentration reported in parentheses for each of the samples: Ground 1 (185 mg/kg); Ground 2 (578 mg/kg), Ground 3 (511 mg/kg); Ground 4 (132 mg/kg); Ground 5 (191 mg/kg); Ground 6 (106 mg/kg); and Ground 7 (138 mg/kg). PCBs were detected in the Ground 1 sample at a total concentration of 0.771 mg/kg. The results appear to indicate releases to the environment, with the concentration of ETPH exceeding the pertinent soil remediation standard of 500 mg/kg at two locations. ALTA is not aware of the location, depth or nature of these soil samples, or whether any evaluations of the degree and extent of environmental impacts associated with these releases or remediation of such environmental impacts has been completed. The DEP's Emergency Incident Report indicates that the status of this incident is closed. Nonetheless, the above findings indicate that an evaluation of the degree and extent of soil and groundwater impacts associated with each documented release area, and potential remediation of those release areas, is warranted. A Phase I should be completed to identify other potential areas of environmental concern at this property.

Sincerely yours,

ALTA Environmental Corporation



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