



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

**URGENT MATTER - PROMPT AND COMPLETE REPLY IS REQUIRED
CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

September 10, 2007

Brian P. Washburn, Senior Project Manager
HRP Associates, Inc.
197 Scott Swamp Road
Farmington, CT 06032

Re: Wampus Milford Associates Site Time-Critical Removal Action
80 Wampus Lane
Milford, Connecticut
Approval of *Soil Excavation Work Plan*

Dear Mr. Washburn:

Thank you for submitting the *Soil Excavation Work Plan* ("Work Plan") document to EPA, on behalf of FCI USA, for the purposes of performing cleanup work of a swale required under the Administrative Order on Consent ("AOC") for the Wampus Milford Site, effective August 7, 2007. The Wampus Milford Site is located at 80 Wampus Lane in Milford, Connecticut. The July 2007 Work Plan was originally submitted to EPA by cover letter dated August 21, 2007. The Work Plan was subsequently revised via cover letter to EPA dated August 30, 2007 with an accompanying *Wetland Restoration Plan* and via e-mail to EPA dated August 30, 2007 detailing certain additional revisions to the Work Plan. The revised date of the Work Plan is August 25, 2007, revision 1.

The purpose of this letter is to document EPA's approval of the Work Plan, dated August 25, 2007, revision 1, and to approve the initiation of on-site cleanup activities at the Wampus Milford Site in accordance with the approved Work Plan.

This letter also includes some additional comments and questions on the Work Plan and the *Health and Safety Plan* ("HASP") for the Wampus Milford Site, submitted to EPA on behalf of FCI USA via cover letter dated August 16, 2007:

Work Plan

1. (Section 8.1.4) Laura Pagliaro's phone number is incorrect. The correct phone number is (203) 783-3319.
2. (Appendix E – *Wetland Restoration Plan*) Revise plan to clarify quantities of plantings required to stabilize the area disturbed by response-related site

activities. How will planting plans change as contaminated soils are removed and the total extent of disturbed area is realized?

3. (Appendix E – *Wetland Restoration Plan*) The monitoring period currently proposed in the plan is for the first growing season. What monitoring criteria (e.g., evaluation of [a] erosion and sedimentation controls, [b] establishment of installed vegetation, and [c] need for additional plantings and/or removal of interfering invasive species) will be used to release the site following re-vegetation, to ensure the integrity of the remedy?

HASP

1. Recommend revising the HASP to include a personal air sampling program to monitor clean-up workers' exposure. The sampling program should include the use of a personal air sampling pump installed within the individual's breathing zone and sample cartridges for metals (including beryllium) and total suspended particulates ("TSP"). This monitoring should occur until sufficient data has been collected to determine workers' exposure level. This data, along with data obtained from the fixed air sampling stations, will provide sufficient information to determine the appropriate level of personal protective equipment ("PPE") and, for example, to provide a justification for downgrading or upgrading PPE levels, as appropriate.

Concurrent with the initiation of cleanup activities at the Site, please provide responses to the changes requested in this letter to EPA, as well as copies (electronic and hard copies) of revised documents, within 5 days of the date of your receipt of this letter. If you have any questions, please do not hesitate to contact me by phone at (617) 918-1298 [office] or (617) 571-5666 [cell].

Sincerely,



Melanie Morash, On-Scene Coordinator
US EPA Region I

cc: Steven R. Novick, Chief, Emergency Response & Removal II, EPA Region I via e-mail
Sharon Fennelly, Enforcement Coordinator, EPA Region I via e-mail
Amelia Katzen, Senior Enforcement Counsel, EPA Region I via e-mail
Gennady Shteynberg, CTDEP via e-mail
Dr. A. Dennis McBride, Milford Health Department via e-mail
Mayor James L. Richetelli, Jr., Milford, Connecticut via e-mail
Scott Durmin, FCI USA via e-mail
Jill Steps, FCI USA via e-mail
Douglas Cohen, Brown, Rudnick via e-mail