

PUBLIC NOTICE

NOTICE OF AVAILABILITY OF STATEMENT OF BASIS FOR DETERMINATION THAT RESOURCE CONSERVATION AND RECOVERY ACT CORRECTIVE ACTION OBLIGATIONS ARE COMPLETE WITH CONTROLS FOR

**Hamilton Sundstrand Corporation
19.57-ACRE HILLTOP PARK PARCEL OFF PARK ROAD, EAST GRANBY, CT 06026**

WITH PERMIT MODIFICATION

**Permit to Operate a Connecticut Hazardous Waste Storage and Treatment Facility,
Permit Number DEEP/HWM-165-005 (Part B Hazardous Waste Facility Permit)
One Hamilton Road, Windsor Locks, CT 06096
Hamilton Sundstrand Corporation
EPA ID No. CTD001145341**

Based upon investigation and remedial activities that have been completed at Hamilton Sundstrand's (HS) 19.57-Acre Hilltop Park Parcel (HTPP) in East Granby, Connecticut, the Connecticut Department of Energy and Environmental Protection (the Department) is announcing its proposed Completion Determination that Corrective Action obligations under the Hazardous and Solid Waste Amendments of the Resource Conservation and Recovery Act (RCRA) are "complete with controls" (limited to industrial/commercial use restrictions) for the HTPP, and that no activities at the HTPP require a hazardous waste management or any other permit under RCRA.

The HTPP is located approximately 0.5-mile northwest of the HS Permitted Facility in Windsor Locks that is authorized to operate under the Part B Hazardous Waste Facility Permit referenced above. The HTPP is a separate parcel off of Park Road within the town of East Granby, Connecticut. No waste management units are located on, and no further investigation or remediation is needed for the HTPP. The determination that remediation is complete and that a permit is not needed for this parcel means that the HTPP is no longer subject to the Corrective Action and other obligations that continue to apply to remaining portions of the HS facility (predominantly located in Windsor Locks, Connecticut) under the administrative consent orders previously issued by the Department and the U.S. Environmental Protection Agency and HS's RCRA Part B Hazardous Waste Facility Permit issued by the Department. Concurrently, the permit is also being modified to reflect the termination of those corrective action and permit provisions with respect to the HTPP.

Additional information pertaining to the investigation, remediation and status of the HTPP may be obtained by reviewing the associated Statement of Basis. This Statement of Basis is posted on the Department's webpage listing public notices of proposed permit decisions: <https://portal.ct.gov/DEEP/Public-Notices/Public-Notices-Proposed-Actions--Opportunity-for-Comment/Proposed-Individual-Permits> under Hamilton Sundstrand Hilltop Testing and Park Parcel and also available for review at the Public Records

Center at Department Headquarters located at 79 Elm Street in Hartford Connecticut. Additional information about the investigation undertaken and the Corrective Action completed at the HTPP can also be obtained by contacting AECOM'S Lawrence M. Hogan at (978) 905-2100.

Virtual Public Meeting

DEEP will host a Virtual Public meeting regarding this draft permit on May 8th, 2024, starting at 6 pm, and ending within one (1) hour if all questions are addressed. During the meeting the public will have an opportunity to make comments and ask questions.

Register in advance for this Virtual Public Informational meeting: <https://ctdeep.zoom.us/j/83249787230>. After registering, you will receive a confirmation email containing information about joining the meeting.

How to Review the Draft Permit

This draft permit and fact sheet may be accessed:

1. Through the Department's website: [Proposed Individual Permits](#);
2. At the Hamilton Sundstrand Corporation located at One Hamilton Road, Windsor Locks, CT 06096, Windsor Locks Town Hall located at 50 Church St, Windsor Locks, CT 06096 or Windsor Locks Public Library located at 28 Main St, Windsor Locks, CT 06096; or
3. Contacting the Department at DEEP.REMStewardship@ct.gov.

Requests for Public Comment

The Commissioner will not make a final decision regarding this proposed permit until the public comment period has closed and all received comments have been evaluated and addressed.

All interested persons are invited to express their views on the tentative determination concerning this draft permit. Verbal comments provided during the Public Meeting will be considered.

Written comments on the draft permit must be submitted no later than forty five (45) days after the publication of this notice. Written comments should be directed to:

Monica Meschiatti, Environmental Analyst, by email to DEEP.REMStewardship@ct.gov.

Or if email is not possible, by US Postal Service mail to:

Monica Meschiatti, Environmental Analyst, Remediation Division, Bureau of Water Protection and Land Reuse, 2nd Floor, CT Department of Energy and Environmental Protection, 79 Elm Street, Hartford, CT 06106-5127.

The State of Connecticut has authorization to administer the RCRA hazardous waste program in lieu of the federal government. Therefore, hazardous waste facilities in Connecticut, including those that have stopped operations and are undergoing environmental cleanup, are subject to and must comply with all applicable requirements found in Sections 22a-449(c)-100 through 119 and 22a-449(c)-11 of RCSA and Section 22a-449(c) of the CGS.

The Connecticut Department of Energy and Environmental Protection is an Affirmative Action/Equal Opportunity Employer that is committed to complying with the requirements of the Americans with Disabilities Act. If you are seeking a communication aid or service, have limited proficiency in English, wish to file an ADA or Title VI discrimination complaint, or require some other accommodation, including equipment to facilitate virtual participation, please contact the DEEP Office of Diversity and Equity at 860- 418-5910 or by email at deep.accommodations@ct.gov. Any person needing an accommodation for hearing impairment may call the State of Connecticut relay number -711. In order to facilitate efforts to provide an accommodation, please request all accommodations as soon as possible following notice of any agency hearing, meeting, program or event.

Sincerely,



Ray Frigon
Remediation Division Director
Bureau of Water Protection and Land Reuse

Electronic Copy: Aaron Gilbert, EPA <gilbert.aaron@epa.gov>
Larry Hogan, AECOM <larry.hogan@aecom.com>
John Brogden, AECOM <john.brogden@aecom.com>
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**STATEMENT OF BASIS FOR DETERMINATION THAT
RESOURCE CONSERVATION AND RECOVERY ACT CORRECTIVE ACTION
OBLIGATIONS ARE COMPLETE WITH CONTROLS FOR**

**Hamilton Sundstrand Corporation
THE 19.57-ACRE HILLTOP PARK PARCEL OFF PARK ROAD, EAST GRANBY, CT 06026
EPA ID No. CTD001145341**

Based upon investigation and remedial activities that have been completed at Hamilton Sundstrand's 19.57-Acre Hilltop Park Parcel in East Granby, Connecticut, the Connecticut Department of Energy and Environmental Protection is announcing its proposed Completion Determination that Corrective Action obligations under the Hazardous and Solid Waste Amendments of the Resource Conservation and Recovery Act are "complete with controls" (limited to residential use restrictions) for the Hilltop Park Parcel, and that no activities at the Hilltop Park Parcel require a hazardous waste management permit under the Resource Conservation and Recovery Act for the Hilltop Park Parcel. No waste management units are located on, and no further investigation or remediation is needed for the Hilltop Park Parcel. The determination that remediation is complete and that a permit is not needed means that the Hilltop Park Parcel is no longer subject to the Corrective Action and other obligations that continue to apply to remaining portions of the Hamilton Sundstrand Facility (predominantly located in Windsor Locks, Connecticut) under the administrative consent orders previously issued by the Department and the U.S. Environmental Protection Agency and Hamilton Sundstrand's RCRA Part B permit issued by the Department. Concurrently, the permit is also being modified to reflect the termination of those corrective action obligations and permit provisions with respect to the Hilltop Park Parcel. This will be reflected in the modification of the facility's definition to no longer include the Hilltop Park Parcel in the definition of "Facility."

Statement of Basis
19.57-acre Hilltop Park Parcel off Park Road, East Granby, Connecticut
(EPA ID Number CTD001145341)

Proposed Determination

The Connecticut Department of Energy and Environmental Protection (“DEEP”) is announcing its proposed Corrective Action Complete with Controls (limited to residential use restrictions) determination (“Completion Determination”) under the Hazardous and Solid Waste Amendments of the Resource Conservation and Recovery Act (“RCRA”)¹. DEEP has concluded that all corrective action obligations under RCRA (“Corrective Action” or “CA”)² have been completed and that no hazardous waste management or other RCRA permit is required at the 19.57-acre the Hilltop Park Parcel (“HTPP”), which is currently owned by Hamilton Sundstrand Corporation.

The Hamilton Sundstrand Corporation Facility properties that have been subject to RCRA CA obligations (“Facility”)³ includes an active manufacturing complex as well as the HTPP and other nearby parcels. Together, the Facility properties occupy approximately 254 acres, predominantly in Windsor Locks, and other small portions are located in the towns of Windsor and East Granby, Connecticut. The HTPP is located approximately 0.5-mile northwest of the main Hamilton Sundstrand Corporation manufacturing complex, on a separate parcel off of Park Road within the town of East Granby, CT.

The Hamilton Sundstrand Corporation Facility was permitted as a RCRA Part B Hazardous Waste Facility under EPA ID Number CTD00114531 in September 2010, which was renewed for a ten-year period on September 29, 2021 (the “RCRA Part B Permit”). The HTPP is located outside of the area where Hamilton Sundstrand Corporation has been authorized to operate hazardous waste management units (the “permitted facility” as defined in Section I.F.(19) of the RCRA Part B Permit) but is a nearby property that has been considered to be contiguous and under the control of Hamilton Sundstrand Corporation and therefore was included in the Facility solely for the purposes of implementing corrective action.

Following environmental assessment of the HTPP, DEEP has determined that RCRA corrective action obligations are “complete with controls”. For the HTPP the “controls” means that an institutional control that restricts future residential use is in place. No hazardous waste management units were located on, and no further investigation or remediation is needed for the HTPP. Therefore, DEEP has determined that remediation is complete¹ and that no Operating, Closure, or Post-Closure RCRA permit is required for the HTPP because the only institutional control associated with the remedial obligations for the parcel relate to the requirement that the property be managed as an industrial/commercial property and not used for residential purposes. This means that the HTPP will no longer be part of the Hamilton Sundstrand Corporation properties that comprise the “Facility” subject to RCRA corrective action. Hamilton Sundstrand Corporation has therefore requested modification to the Facility’s RCRA Part B Permit to reflect the termination of RCRA corrective action obligations at the HTPP and the revision of the “Facility” definition and CA obligations to exclude the HTPP. DEEP is concurrently proposing to approve this RCRA Part B Permit modification.

¹ “Completion Determination” is a regulatory phrase that refers to a final disposition of a facility or a portion of a facility subject to Corrective Action obligations under the Resource Conservation and Recovery Act. In this case, the Completion Determination proposed for the HTPP is one that is “complete with controls,” where all that remains is maintenance of/compliance with an institutional control to restrict future residential use consistent with the Town of East Granby zoning for the HTPP. More information on this category of Completion Determination can be found in the Federal Register notice entitled, Final Guidance on Completion of Corrective Action Activities at RCRA Facilities, 68 Fed. Reg. 8757 (hereafter, “Final Guidance”).

² DEEP and the U. S. Environmental Protection Agency (“EPA”) have imposed RCRA CA obligations on the Hamilton Sundstrand Corporation Facility properties through provisions in the “Permit to Operate a Part B Hazardous Waste Facility Permit” issued under EPA ID Number CTD001145341 and the following three administrative orders (the “Consent Orders”): DEEP Consent Order No. 4402 (1986); EPA Consent Order RCRA No. I-88-1075 (1989); and EPA Consent Order RCRA No. I-94-1046 (1994).

³ Hereafter, these Hamilton Sundstrand Corporation properties will be referred to as the “Facility” and the HTPP portion of the Facility that is the subject of this Statement of Basis will be referred to as the “HTPP.”

Statement of Basis
19.57-acre Hilltop Park Parcel off Park Road, East Granby, Connecticut
(EPA ID Number CTD001145341)

Introduction

DEEP is announcing its proposed “Completion With Controls” Determination under the Hazardous and Solid Waste Amendments of RCRA. DEEP has concluded that Corrective Action obligations for the HTPP have been completed and that no Operating, Closure, or Post-Closure RCRA permit is required for this parcel, only maintenance and compliance with the institutional control that restricts future residential use is necessary.

This Statement of Basis is intended to:

- Explain the opportunities for the public to participate in this process, including how the public may comment on this proposed “Completion Determination” and to identify where the public can find more detailed information;
- Provide a brief description and history of the HTPP;
- Present the principal findings of environmental investigations and activities performed to date;
- Present the DEEP’s rationale for proposing that Corrective Action obligations under the Hazardous and Solid Waste Amendments of RCRA are “complete with controls” with necessary maintenance and compliance with the institutional control that restricts future residential use for the current and proposed future land use of the HTPP, although the control does not warrant continued inclusion in a RCRA permit as it is limited to the restriction of the property to non-residential use; and,
- Present the DEEP’s rationale for revising the Hamilton Sundstrand Corporation RCRA Part B Permit “Facility” definition and CA obligations to exclude the HTPP.

THE PUBLIC’S ROLE IN EVALUATING THIS CORRECTIVE ACTION PROPOSAL/ RECOMMENDATION AND PROPOSED RCRA PART B PERMIT MODIFICATION

DEEP is publishing this document to provide the opportunity for public review and comments on the matters described in this Statement of Basis including its Completion Determination. DEEP will consider public comments as part of its decision-making process.

All interested parties are invited to express their views on this proposal. Public comment on all potential Corrective Action proposals or measures, and supporting information, is an important contribution to DEEP’s decision making/remedy selection process.

A final decision regarding this proposed Completion Determination and RCRA Part B Permit modification will not be made until the public comment period has closed and all comments received by DEEP have been evaluated and addressed. Based on any new information or comments from the public, DEEP may modify its proposed decision.

Opportunity for Public Comment

Written comments on this proposal will be accepted throughout the 45-day public comment period to provide ample opportunity for public comment and involvement during the evaluation of this proposal. During this 45-day public comment period, the public is invited to review this Statement of Basis and supporting information. The announcement of the public comment period and instructions for submitting written comments and participating in a public informational meeting will be provided in the public notice of this proposed determination.

Statement of Basis
19.57-acre Hilltop Park Parcel off Park Road, East Granby, Connecticut
(EPA ID Number CTD001145341)

Access to Public Records

This Statement of Basis provides a summary description of the investigation and activities performed at the HTPP that are part of the Administrative Record that DEEP relied upon for its proposed determination that Corrective Action obligations (if any) pursuant to RCRA are “complete with controls”, with necessary maintenance and compliance with the institutional control in place that restricts future residential use.

This Statement of Basis is posted on DEEP’s webpage listing public notices of proposed permit [decisions: https://portal.ct.gov/DEEP/Public-Notices/Public-Notices-Proposed-Actions---Opportunity-for-Comment/Proposed-Individual-Permits](https://portal.ct.gov/DEEP/Public-Notices/Public-Notices-Proposed-Actions---Opportunity-for-Comment/Proposed-Individual-Permits) under the Facility’s name, Hamilton Sundstrand Hilltop Testing and Park Parcel and also available for review at the Public Records Center at DEEP Headquarters, 79 Elm St, Hartford CT.

Background

The following information, among other factors, has been used as a basis for this proposal and may be found in the Administrative Record at the locations listed above:

1. April 1992. “Phase I RCRA Facility Investigation” by Baker Environmental.
2. October 2007. “Phase I Environmental Assessment Report” by URS Corporation.
3. May 2019. “Phase II RCRA Facility Investigation” by AECOM, Inc.
4. September 2022. “Supplemental RCRA Facility Investigation” by AECOM, Inc.
5. February 2023. “Corrective Measures Study” by AECOM, Inc.
6. September 2023. “Supplemental RCRA Facility Investigation and Corrective Measures Study Report Former Hilltop Testing Area and Recreation Park Parcel” by AECOM, Inc.
7. February, 2024, “Verification Report for the Former Hilltop Testing Area and Recreation Park Parcel,” by AECOM, Inc.

History of Ownership and Description of Operations

The 19.57-acre HTPP (Figure 1, Site Layout) was purchased by United Aircraft Corporation (presently known as RTX Corporation) in 1951 along with a majority of the Hamilton Sundstrand Corporation Facility. Hamilton Sundstrand Corporation was later incorporated as a subsidiary of RTX Corporation and took title to the Facility properties in 2000.

The HTPP is located approximately 0.5-mile northwest of the main Hamilton Sundstrand Corporation manufacturing complex. The HTPP is divided into two tracts: one tract consists of a 1.9-acre Testing Area formerly used for testing aircraft components such as propeller assemblies and is enclosed by a chain-link fence. The Testing Area was developed in 1956 for use as an engine and propeller testing ground and remained in operation until 1998. The Testing Area consisted of three buildings, engine test stands, and a concrete sound deflection barrier. The second tract consists of a 17.7-acre parcel used as a recreational area formerly known as the Raycroft Walsh Recreational Park (hereinafter referred to as the Recreation Park). The Recreation Park was developed in 1980 and consisted of an activity building, pavilion, and recreation facilities (i.e., tennis courts, bocce courts, basketball courts, softball playing fields, child playground, and picnic area).

The HTPP contained one area of concern (“AC”) and nine recognized environmental conditions (“RECs”) that were evaluated through Phase I, Phase II, and Supplemental RCRA Facility Investigations (“RFIs”). AC-48 was the sanitary septic system associated with the Recreational Park. Two RECs were associated with spills from pole-mounted transformers on Perimeter Road near this area, and the rest of the RECs are associated with the Testing Area. The buildings and associated infrastructure were demolished by Hamilton

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Sundstrand Corporation in 2018 and the area is currently being leased for airport-related operations.

The investigation and development of corrective measures for the HTPP and other Facility properties was mandated primarily by a Consent Order entered into by Hamilton Sundstrand Corporation with the United States Environmental Protection Agency, identified as I-88-1075, that became effective on August 7, 1989, with obligations to complete Corrective Action activities incorporated into the Facility's RCRA Part B Permit. Site investigation and remediation have proceeded under the RCRA Corrective Action program since that time.

Applicability of RCRA Corrective Action at the Facility

The remediation requirements that have applied to the HTPP are limited to RCRA Corrective Action. No hazardous waste was ever generated, stored, disposed of or treated on the HTPP; therefore, no closure or other requirements for hazardous waste management units are applicable. A review of the HTPP history has also confirmed that the parcel is not regulated as an "establishment" under Connecticut's Property Transfer Act.

Summary of the RCRA Corrective Action Activities

An Environmental Land Use Restriction was approved by DEEP and recorded on the land records for the HTPP on August 22, 2023, that prohibits residential activities on the HTPP. The Environmental Land Use Restriction is consistent with the industrial/commercial activities that are currently conducted on the HTPP in accordance with the business and industrial zone restrictions imposed on the HTPP under the Town of East Granby Zoning Regulations. Consistent with EPA's Final Guidance, RCRA permit provisions are not required to enforce and maintain this institutional control at the HTPP.

No other RCRA CA activities are required because no releases were identified that exceed applicable cleanup criteria in DEEP's Remediation Standard Regulations ("RSRs"), which are the applicable Media Protection Standards for the HTPP. The cleanup criteria applicable to the HTPP are limited to soil as investigations demonstrated that releases at the HTPP were limited to unsaturated soil and did not reach underlying groundwater. The soil criteria applicable to the HTPP are:

- The Industrial Commercial Direct Exposure Criteria ("IC/ DEC"), which are protective of direct human contact with soils under current and future site uses, which are limited to industrial/commercial activities by the Environmental Land Use Restriction.
- The Pollutant Mobility Criteria for land located within an area mapped by DEEP with groundwater classification GA ("GA PMC"). The HTPP area is located in a GA groundwater classified area, indicating that groundwater is considered suitable for human consumption without treatment.

Abutting Land Uses

Abutting land uses surrounding the HTPP consist of the following:

North – Bradley International Airport and undeveloped land;

South – Route 20;

East/Southeast – Route 20, undeveloped land, Rainbow Brook, the Hamilton Sundstrand Corporation Facility; and

West/Northwest – undeveloped land and Route 20.

Potential Exposure Pathways

Investigations conducted at the HTPP to date have identified the following potential exposure pathways for

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19.57-acre Hilltop Park Parcel off Park Road, East Granby, Connecticut
(EPA ID Number CTD001145341)

each AC and REC within the parcel:

- AC-48 (Septic Leach Field): Constituents entering the septic system would have a direct pathway to subsurface soils and could potentially migrate to groundwater.
- REC-1 (Three Former USTS): Direct exposure to surface soil from historical spills and subsurface soils from leaks that could potentially migrate to groundwater.
- REC-2 (Former T-56 Test Stand): Direct release to the soil surface from historical post-testing cleaning operations, spills, and leaks.
- REC-3 (Former 1,000 Gallon Fuel UST): Release to subsurface soils from potential UST leaks or direct release to surface soil from overfills.
- REC-4 (Former X-22A Test Stand): Direct release to the ground surface from historical cleaning operations, spills, and leaks.
- REC-5 (Maintenance Garage): Constituents potentially entering the septic system or released from within the interior service pit or through cracks or seams in the floor/foundation of the Maintenance Garage Building would have a direct pathway to soils and potentially could migrate to groundwater. Potential releases from the circuit transformer could have directly impacted the concrete floor and then potentially could migrate to underlying soil through cracks or seams.
- REC-6 (Localized Test Stands); Direct release to ground surface from engine operation and purging practices.
- REC-7 (Perimeter Road Transformer Oil Spill, June 1992): Direct release to the ground surface via oil spill in June 1992.
- REC-8 (Perimeter Road Transformer Oil Spill, June 2001): Direct release to the ground surface at the base of utility pole No. 1436 via oil spill in June 2001.
- REC-9 (Control Building): Direct release to concrete flooring or to surficial soils outside of the building.

Ecological Risk Assessment

A Baseline Ecological Risk Assessment and Supplemental Baseline Ecological Risk Assessment were conducted by AECOM, Inc. and used to derive ecological Media Protection Standards for the entire Hamilton Sundstrand Corporation Facility. However, no ecological exposure areas were identified on the HTPP that required evaluation in the Baseline Ecological Risk Assessment or Supplemental Baseline Ecological Risk Assessment. Therefore, ecological risk assessment is considered complete for the HTPP.

Evaluation of the Nature and Extent of Contamination

Phase I, Phase II and Supplemental environmental site assessments of the HTPP were performed to evaluate environmental conditions at the one AC and nine RECs identified within this parcel. A total of 170 soil samples were analyzed from the ground surface to depths of up to 35 feet including soil collected and analyzed within the water table. Sample analyses were consistent with evaluating potential releases from former HTPP operations and included Volatile Organic Compounds, Semivolatile Organic Compounds, Extractable Total Petroleum Hydrocarbons (“ETPH”), Polycyclic Aromatic Hydrocarbons, Polychlorinated Biphenyls (“PCBs”) and metals. The assessments confirmed that:

- AC-48 – Septic Leach field. Releases were not identified in AC-48.
- REC-1 -Former USTs. The Phase II RFI determined that releases did not occur from REC-1. ETPH detected in shallow soil in this area (0-4 feet below ground surface [ft bgs]) was attributed to testing operations in REC-6. Soil samples that were collected within this area at greater depths (up to 35 ft bgs) did not have ETPH or any other petroleum-related constituents detected including a saturated soil sample from below the water table, which was encountered at a depth of 28 ft bgs.

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- REC-2 – Propeller Test Stand. REC-2 is the only area of the HTPP with soil samples containing ETPH at concentrations greater than the Connecticut RSRs’ IC DEC. Evaluation of REC-2 soil data using upper the 95th percentile confidence limit of the arithmetic mean of data (“UCL”) associated with this REC does not exceed the IC DEC, demonstrating compliance with the RSRs. Note that data from REC-2 was evaluated individually and also in conjunction with REC-6 which is discussed further below. These RECs were considered related because these two RECs are contiguous and had similar activities (i.e., open air engine test stands) and release mechanisms (i.e., releases to the ground surface from test stand operations) identical contaminants of concerns (i.e., ETPH), and identical exposure and contaminant transport mechanisms (i.e., direct exposure to soil and potential leaching to underlying groundwater from precipitation traveling through petroleum-containing surficial soils. Both calculated UCL values (i.e. both with and without REC-6 data) are below the IC DEC. Concentrations of ETPH also exceeded the GA PMC in REC-2. Compliance with the GA PMC is discussed further below under REC-6.
- REC-3 – Fuel Oil UST. Releases were not identified in this REC.
- REC-4 – Test Stand, REC-5 – Maintenance Garage Building. These two RECs were evaluated together based on proximity. Soil samples collected in RECs 4 and 5 did not contain constituents of concern at concentrations greater than the GA PMC or IC DEC. A previous detection of isophorone in REC-4 that exceeded the DEEP’s additional polluting substance criteria for this compound was determined to be an anomaly as this parameter was only found in the duplicate of one of five sample locations in REC-4 and the result was not repeatable in a Supplemental RCRA Facility Investigation (SRFI) that was conducted in 2018.
- REC-6- Test Stand- soil sample results from this test stand contained ETPH results at concentrations greater than the GA PMC and the Residential Direct Exposure Criteria (“R DEC”) but below the IC DEC. Since an Environmental Land Use Restriction to restrict future residential uses has been recorded, the R DEC do not apply to the HTPP. A total of 20 samples from both REC-2 and REC-6 were further analyzed for ETPH following synthetic precipitation leaching procedure (“SPLP”) extraction to determine if the detected concentrations would leach from the soil at concentrations exceeding the RSRs Groundwater Protection Criterion (“GWPC”), which is an alternative approach for demonstrating compliance with the GA PMC under the RSRs. SPLP ETPH concentrations greater than the GWPC were detected in one sample. The SPLP data set was further evaluated using the UCL. The UCL calculation recommended two values for the SPLP ETPH data, both of which were below the GWPC; therefore, REC-2 and REC-6 are in compliance with the GA PMC. No other exceedances of the GA PMC were detected in AC-48 or the other seven RECs evaluated. Therefore, the HTPP was determined to be in compliance with the GA PMC.
- REC-7 and 8 – Pole Mounted Transformers Along Park Road. Spills from these transformers occurred historically and were cleaned up by excavation and proper off-site disposal. Samples collected in the Phase II RFI did not detect PCBs; however, EPA commented that the samples may not have been collected deep enough to encounter soils underlying the remedial excavations. Additional deeper samples were collected in the 2018 SRFI and PCBs were not detected in the soil samples collected below the reported depth of remediation for the former transformer spills associated with RECs 7 and 8.
- REC-9 – Control Building. Releases were not identified in REC-9.

DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION (DEEP) PROPOSAL

Based upon the above information, DEEP is proposing to issue a “Corrective Action Complete With Controls”

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19.57-acre Hilltop Park Parcel off Park Road, East Granby, Connecticut
(EPA ID Number CTD001145341)

for the HTPP. The “control” is an institutional control in the form of an Environmental Land Use Restriction that restricts future residential use at the parcel. In accordance with the EPA guidance on Completion Determinations, DEEP believes the Completion Determination for the HTPP is appropriate because:

1. There are not currently, nor were there ever, any treatment, storage, or disposal activities at the HTPP that require a permit under RCRA;
2. All Corrective Action obligations applicable to the HTPP have been completed without the use of engineering controls and with only a the Environmental Land Use Restriction that prohibits residential activities on the HTPP and allows RSR compliance to be achieved under the IC DEC; and
3. All other ACs and RECs are also in compliance with the RSRs and no further action is needed.

Notwithstanding this Completion Determination, EPA or an authorized State may conclude additional cleanup is needed if, after this Completion Determination, EPA or an authorized State discovers evidence of unreported or misrepresented releases. *See* 68 Fed. Reg. 8763, footnote 15.

In summary, DEEP, in coordination with EPA, and using all available information, is announcing its proposed determination that Corrective Action at the HTPP is “Complete with Controls,” based on the Environmental Land Use Restriction that are in effect limiting use of the HTPP to industrial and commercial activities. Consistent with EPA’s Final Guidance, DEEP has determined that no Operating, Closure, or Post-Closure RCRA permit is needed for the HTPP or for maintenance of this institutional control. This means that the HTPP is no longer part of the defined of the RCRA Facility identified with the EPA ID No. CTD001145341, and the Hamilton Sundstrand Corporation Facility’s RCRA Part B Permit is being modified pursuant to RCSA Section 22a-449(c)-110, incorporating 40 CFR 270, 271, and 40 CFR 124 to exclude the HTPP. All obligations with respect to compliance with RCSA Section 22a-449(c)- 104(a)(2)(P) incorporating 40 CFR Part 264.101 with respect to known Solid Waste Management Units or Areas of Concern have been met.

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19.57-acre Hilltop Park Parcel off Park Road, East Granby, Connecticut
(EPA ID Number CTD001145341)

Facility Site Plan

DRAFT

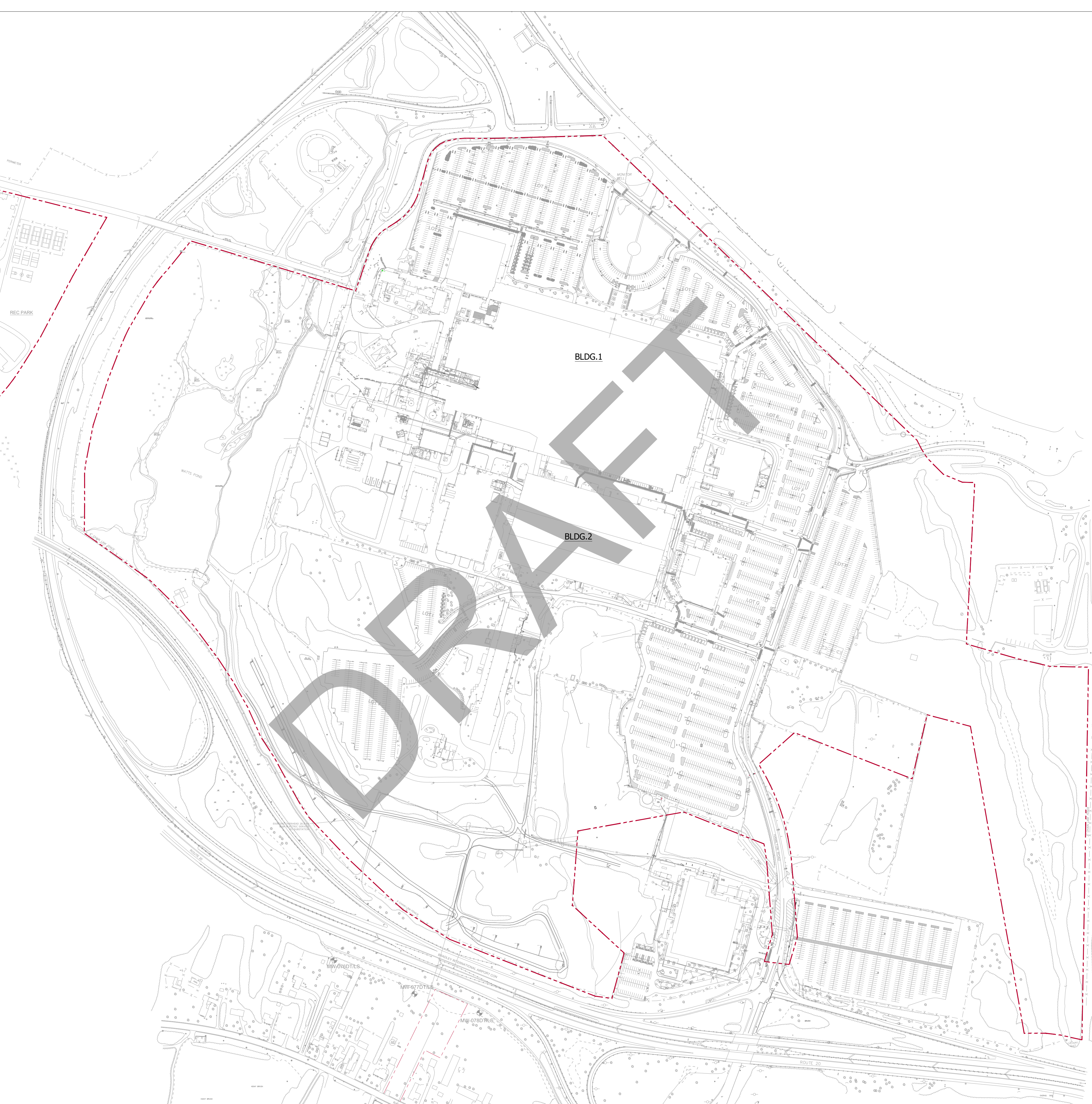
LEGEND:
 ○ SANITARY MANHOLE
 □ CATCH BASIN
 T TELEPHONE POLE

PROPERTY BOUNDARIES FOR RCRA
 CORRECTIVE ACTION COMPLETION
 DETERMINATION FOR THE
 19.75 ACRE HILLTOP RECREATION PARK
 PARCEL - PARK ROAD, EAST GRANBY, CT.

DRAFT

BLDG.1

BLDG.2



REV	DESCRIPTION	DATE	BY

Collins Aerospace
ONE HAMILTON ROAD, WINDSOR LOCKS, CT 06096

SITE PLAN FOR HAMILTON SUNDBRAND CORPORATION

ENG:	DRFT:	DATE:	2/14/24
JOB #:			
APPVD:	SCALE:	PLANT ENGINEERING	
	NONE		

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SHEET 1 OF 1

THIS DOCUMENT DOES NOT CONTAIN ANY EXPORT CONTROLLED TECHNICAL DATA