



DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA750)

Migration of Contaminated Groundwater Under Control

Facility Name: Former Howe Furniture Facility
Facility Address: 151 Woodward Avenue, Norwalk, CT 06856
Facility EPA ID #: CTD001162858

RCRA RECORDS CENTER
FACILITY Howe Furniture
I.D. NO. CTD001162858
FILE LOC. R-13
OTHER #106130

- 1. Has all available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been considered in this EI determination?

[X] If yes - check here and continue with #2 below.

[ ] If no - re-evaluate existing data, or

[ ] if data are not available, skip to #8 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

## REFERENCES

The primary sources of the information used in this EI are listed below. They can be found in the RCRA Records Center on the first floor of One Congress Street, Boston, MA.

1. May 22, 1992. Preliminary Assessment Plus. Prepared by TRC.
2. March 9, 1998 Environmental Condition Assessment Form for the Former Howe Furniture Facility, 151 Woodward Ave, Norwalk, CT.
3. June 1, 1998 Phase I Environmental Site Assessment Report for the Former Howe Furniture Facility, 151 Woodward Ave, Norwalk, CT.
4. May 27, 1999 Phase II Subsurface Investigation at the Former Howe Furniture Facility, 151 Woodward Ave, Norwalk, CT.
5. January 11, 2001 EI Determination for the Former Howe Furniture Facility, 151 Woodward Ave, Norwalk, CT.
6. July 2001 RFI Work Plan, Former Howe Furniture Facility, 151 Woodward Ave, Norwalk, CT., Volumes 1 and 2.
7. February 2002 RCRA Facility Investigation Work Plan, Former Howe Furniture Facility, 151 Woodward Ave, Norwalk, CT.
8. September 2006 CA750 Environmental Indicator Evaluation, prepared by HRP.
9. March 30, 2007 First Quarterly Groundwater Monitoring Event report.
10. May 18, 2007 Second Quarterly Groundwater Monitoring Event report.
11. October 29, 2007 Third Quarterly Groundwater Monitoring Event report.

## SITE BACKGROUND

The approximately 7 acre site includes a single story concrete block building with a total foot print of approximately 117,000 square feet. The site is bordered to the north by the S.B.J. Moving Company, to the south by a town recreational park, numerous residential homes are located across Woodward Ave to the east, and Aztec Inc. and a wetland area (Village Creek) border the site to the west. Pavement extends westward from Woodward Ave and wraps around the site to the southern side of the building. Norwalk harbor is located approximately 0.25 miles to the east-northeast of the site. The site is located within the 100 year flood plain of Village Creek.

City records indicate the site was undeveloped from at least 1923 until 1961. Howe Folding Furniture began operations at the site in 1962 and operated until approximately 1995. The property is serviced by municipal water and sewer, and is heated with natural gas. Four pad mounted transformers are located outside the west and north sides of the building. Five storm drains are located around the exterior of the site which are connected to the municipal storm sewer line. The property is zoned "Restricted Industrial" use. Site topography is nearly level. Groundwater flow is tidally influenced; the direction of flow is cyclic and varies from west-

northwest (toward the adjacent Village Creek wetlands) to the northeast and southeast (toward Norwalk Harbor).

Howe was a manufacturer of tables, desks, and study carrels comprised of wood and metal parts. Howe conducted machining, dry grinding, welding, anti rust dipping, painting, metal parts cleaning, electrostatic spray painting, metal stamping and bonding, glue application, vapor degreasing, and silver soldering. Hazardous materials included various solvents, lacquers, thinners, and cadmium solder waste.

Currently, the building is divided into three sections. The northern section currently houses Cober Electronic Mfg., a manufacturer of industrial microwave heat sources for vulcanizing rubber and for commercial cooking applications. The central section is occupied by the US Post Office. The western portion of the building is occupied by Pepperidge Farm, which uses the building as a dry food storage warehouse.

At least one underground storage tank (UST) was historically present on site. An UST located in areas of concern (AOCs) 1 and 12 was removed in 1988. In 1995, 1,215 tons of petroleum contaminated soil were removed from this area. A second possible UST was historically located on the southern side of the structure. The records concerning this UST are conflicting and it is unclear whether this UST ever existed.

TRC performed a Preliminary Assessment-Plus (P.A. Plus) Final Report for the Site in 1992. TRC identified 12 AOCs at the site. All of the AOCs were related to Howe's historic on-site manufacturing processes and waste materials handling and disposal. The report mentions a Connecticut Department of Environmental Protection (CTDEP) site inspection where 8 to 10 drums were observed at the rear of the building with some of the contents of the drums spilled on the pavement.

A Phase II Subsurface Investigation Report, dated September 1995, was prepared by HRP for the work performed in AOCs 1 and 12, including the installation of monitoring wells and the collection and analysis of soil and groundwater samples.

A Phase III Subsurface Investigation Report, dated November 22, 1995, was prepared by HRP. The report details the performance of 10 soil borings in AOCs 1 and 12.

On December 21, 1995 and February 1, 1996, HRP performed soil excavations and soil sampling around a sub-slab concrete encased waste pipe located between AOCs 5 and 6. Approximately 0.8 cubic yards of contaminated soil and concrete was excavated and removed from the site.

A June 1996 HRP report titled "Summary of Investigations/Removal Activities Performed Inside the Howe Furniture Corp. Facility" describes work performed including the collection and analysis of soil and/or concrete samples from various AOCs. Soil samples were collected from under the cracked concrete slab floor.

On June 1, 1998, Howe submitted the Phase I Environmental Site Assessment Report for the

Former Howe Furniture Facility, 151 Woodward Ave, Norwalk, CT. This report, which was prepared by HRP, summarized existing historical information for the site.

On May 27, 1999, Howe submitted a Phase II Subsurface Investigation report. This report detailed a subsurface investigation at the site including a soil gas survey, the performance of test borings and installation of monitoring wells, and collection and analysis of soil and groundwater samples. The measured depth to groundwater on site was as shallow as 3 feet. Groundwater samples were analyzed for total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs) and 8 RCRA metals (dissolved). The Phase II report noted that trichloroethene (TCE) was observed in wells MW-10 and MW-11 at concentrations of 11 parts per billion (ppb) and 6 ppb, 1,1 dichloroethene (1,1-DCE) was observed in MW-7 and MW-8 at concentrations of 1 ppb and 2 ppb, and vinyl chloride was detected in MW-13 at a concentration of 2 ppb.

In July 2001, Howe submitted a 2 volume RCRA Facility Investigation (RFI) Work Plan and draft quality assurance project plan (QAPP) to conduct additional investigations at the site. The RFI proposal included a Facility Investigation Plan and a Long Term Monitoring and Sampling Plan.

During the summer of 2002, Howe's consultant HRP conducted additional investigations pursuant to the RFI Work Plan. HRP installed additional wells and conducted a synoptic sampling of monitoring wells for parameters historically encountered to determine baseline concentrations.

In 2005, groundwater beneath and in the vicinity of the site was re-classified from GA to GB. There are no water supply wells located within a one mile radius of the site.

In 2007, Howe submitted the first, second, and third quarterly Groundwater Monitoring Reports, dated March 30, 2007, May 18, 2007, and October 29, 2007.

## **BASIS FOR CA 750 ENVIRONMENTAL INDICATOR DETERMINATION**

EPA reviewed groundwater data for each monitoring well. Since the groundwater has been reclassified as GB, the groundwater data were compared to the CT Remediation Standard Regulation (RSR) Surface Water Protection Criteria (SWPC), and the Industrial/Commercial Volatilization Criteria (I/C VC) including the proposed revisions to the I/C VC.

2. Is **groundwater** known or reasonably suspected to be "**contaminated**"<sup>1</sup> above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

### **Footnotes:**

<sup>1</sup>"Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.

If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."

If unknown - skip to #8 and enter "IN" status code.

#### Rationale and Reference(s):

The appropriately protective "levels" being used for this EI are the Connecticut RSR SWPC and the proposed revisions to the I/C VC. HRP conducted groundwater sampling events in August 1995, February and March 1999, August 2002, March and August 2006, and January, April, and July 2007. The results of groundwater sampling over this 12 year period are fairly consistent, with detections of relatively low levels of several VOCs and metals in several on-site wells. However, for this EI determination, EPA is focusing on the more recent groundwater sample results collected in 2002, 2006 and 2007.

The key contaminants in groundwater are metals and chlorinated VOCs.

**METALS.** Arsenic was the metal most commonly detected in groundwater samples above its SWPC OF 4 ppb. In March 2006, the highest concentration of arsenic detected in groundwater samples from site monitoring wells was 16.7 ppb in wells 19-D and MW-102. In August 2006, arsenic was detected above the SWPC in only one well, MW-16, at a concentration of 12.8 ppb. In January, April, and July 2007, several detections of arsenic were above the SWPC. The highest was a concentration of 33.5 ppb arsenic in well MW-9, which is located beneath the building.

Copper and lead were also detected in several wells at concentrations slightly above the SWPC in March 2006, but were not detected in the August 2006, January 2007, or April 2007 sampling rounds. Sporadic hits of the metals cadmium, mercury and zinc have also been detected at concentrations slightly above the SWPC.

**CHLORINATED VOCs.** Various chlorinated VOCs, including tetrachloroethene (PCE), TCE, 1,1 DCE, 1,1,1 trichloroethane (1,1,1- TCA), and vinyl chloride, have been detected in monitoring wells at relatively low levels. The only chlorinated VOC detected above the proposed I/CVC was vinyl chloride. The proposed revised I/C VC for vinyl chloride is 52 ppb. The highest concentration of vinyl chloride detected in groundwater was in a sample from well MW-19M at a concentration of 100 ppb in August 2002. A duplicate sample collected at the same time and from the same well detected only 48 ppb vinyl chloride. More recent sampling of this well conducted in March and August 2006 and January, April, and July 2007 detected vinyl chloride at concentrations below 5 ppb. Analyses of recent groundwater samples collected from well MW-By Others detected vinyl chloride at concentrations of roughly half of the proposed I/C VC for vinyl chloride of 52 ppb.

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"<sup>2</sup> as defined by the monitoring locations designated at the time of this determination)?

If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"<sup>2</sup>.

<sup>2</sup> "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and

that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

\_\_\_\_\_ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"<sup>2</sup>) - skip to #8 and enter "NO" status code, after providing an explanation.

\_\_\_\_\_ If unknown - skip to #8 and enter "IN" status code.

#### Rationale and Reference(s):

Contaminated groundwater is expected to remain within the horizontal and vertical dimensions of the existing area of groundwater contamination. This determination is based on the existing groundwater quality and hydraulic data, the excavation and removal of contaminated soils from two source areas in the mid 1990's, and the fact that industrial processes that generated hazardous wastes ceased more than 11 years ago.

Groundwater levels in monitoring wells have been measured numerous times over the past decade. Groundwater flow direction on the western and eastern sides of the site appear to be influenced by the tides and varies depending on the period in the tide cycle when the measurements are taken. In order to gain a better understanding of the complex groundwater flow at the site, in 2002 the facility measured groundwater levels in three widely spaced wells over a 48 hour period. The groundwater flow direction varied over the tide cycle from northeast to southeast. Based on all of the hydrogeologic information available, it appears that there is little net flow of contaminated groundwater.

The surface of the water table is lowest beneath the north/central section of the building, so that nearby groundwater from the west, south, and east apparently flows toward this area, possibly as a result of shallow groundwater leaking into the storm drain network. The location in three dimensions of the storm drain network (including the depth of the gravel backfill surrounding the network) should be evaluated against the elevation of the water table to determine if this is a potential preferential pathway for contaminant migration. This remains an outstanding data gap which should be fully discussed in the RFI. For the purposes of this EI, EPA assumes that some of the shallow groundwater is discharging to the storm drain network which eventually discharges to Norwalk Harbor.

Metal contaminated soils located beneath the concrete slab floor were excavated and removed in 1996. Over the past 5 years of groundwater sampling events, there have been sporadic hits of several metals slightly above the SWPC, but there is no clear plume present. Arsenic was the most frequently detected metal above its SWPC of 4 ppb. The highest concentration of arsenic detected over the past 5 years was 33.5 ppb in MW-9. The metals copper, lead, cadmium, mercury, and zinc have also been detected in groundwater samples from on-site monitoring wells at concentrations slightly above the SWPC.

There have been sporadic detections of chlorinated VOCs at relatively low concentrations at various locations across the site. Vinyl chloride is the only compound that has been detected above its proposed I/C VC (52 ppb for vinyl chloride). Vinyl chloride was detected at concentrations of 100 ppb and 48 ppb in duplicate groundwater samples from well MW-19M in 2002. Results from the four sampling events in 2006/2007 found generally lower concentrations of vinyl chloride. The highest concentration of vinyl chloride detected in 2006/2007 was 28.5 ppb in well MW-By Others in March 2006. It is not clear who installed this well, how deep the well is, or whether the well is located on the Howe property or the adjacent property to the north. Although the concentrations detected in this well have been approximately one half of the proposed I/CVC, they are above the proposed residential VC of 1.6 ppb. The extent of vinyl chloride contamination above the proposed residential VC in this area is an outstanding data gap.

In summary, arsenic, and to a lesser extent the metals copper, lead, cadmium, mercury, and zinc, have been detected in groundwater samples at concentrations less than an order of magnitude above the SWPC. Over the past four sampling events, several chlorinated VOCs have been detected in groundwater samples, but at concentrations below the proposed I/CVC. Groundwater flow is tidally influenced, and it appears that there is little net flow of contamination across the site, and that contaminated groundwater is not migrating to any significant degree. The

exception to this is a localized depression in the water table beneath the northeast section of the building, which suggests the possibility that some shallow groundwater leaks into a storm drain network which connects to the municipal storm drain network along Woodward Ave and empties into Norwalk Harbor.

4. Does "contaminated" groundwater discharge into surface water bodies?

If yes - continue after identifying potentially affected surface water bodies.

If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

There are no surface water bodies on-site. A chain link fence is located along the western property boundary, at the edge of the paved parking lot. A large tidal wetland area (Village Creek) is located west of the fence/property boundary. At low tide, groundwater flow direction in the western portion of the site may be to the west toward the wetland. According to Figure 5, "Site Drainage Map" which was attached to HRP's February 14, 2002 letter response to EPA comments on the RFI work plan, surface water drainage for most of the western corner of the site is primarily toward the catch basin located near the loading docks. The catch basin network may also intercept shallow groundwater in the north/central portion of the site, where contaminated groundwater could leak into the storm drain network and eventually discharge to Norwalk Harbor.

5. Is the discharge of "contaminated" groundwater into surface water likely to be "insignificant" (i.e., the maximum concentration<sup>3</sup> of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration<sup>3</sup> of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration<sup>3</sup> of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations<sup>3</sup> greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

If unknown - enter "IN" status code in #8.

<sup>3</sup> As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

Rationale and Reference(s):

The discharge of contaminated groundwater from the site to the saltwater tidal wetlands to the west and/or Norwalk Harbor to the east and south is likely to be insignificant. Over the past 5 years of groundwater sampling events, there have been sporadic hits of several metals slightly above the SWPC. Arsenic was the most frequently detected metal above its SWPC. The highest concentration of arsenic detected over the past 5 years was 33.5 ppb in MW-9. This is less than 10 times the SWPC for arsenic of 4 ppb. The metals copper, lead, cadmium, mercury, and zinc have also been detected in groundwater samples from on-site monitoring wells at concentrations slightly above the SWPC.

There have been sporadic detections of chlorinated VOCs at relatively low concentrations at various locations across the site. Vinyl chloride is the only compound that has been detected above its proposed I/CVC (52 ppb for vinyl chloride). Vinyl chloride was detected at concentrations of 100 ppb and 48 ppb in duplicate groundwater samples from well MW-19M in 2002. Results from the four sampling events in 2006/2007 resulted in the detection of generally lower concentrations of vinyl chloride. The highest concentration of vinyl chloride detected in 2006/2007 was 28.5 ppb in well MW-By Others in March 2006. It appears that concentrations of contaminants in groundwater are not increasing. EPA believes that the discharge of groundwater contaminants into the tidal wetlands to the west and Norwalk Harbor to the east and south is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system

6. Can the **discharge** of “contaminated” groundwater into surface water be shown to be “**currently acceptable**” (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented<sup>4</sup>)?

\_\_\_\_\_ If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site’s surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) providing or referencing an interim-assessment,<sup>5</sup> appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment “levels,” as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

\_\_\_\_\_ If no - (the discharge of “contaminated” groundwater can not be shown to be “**currently acceptable**”) - skip to #8 and enter “NO” status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

\_\_\_\_\_ If unknown - skip to 8 and enter “IN” status code.

Rationale and Reference(s):

<sup>4</sup> Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

<sup>5</sup> The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a



rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

X If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."

If no - enter "NO" status code in #8.

If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

In accordance with the requirements of the CT DEP Transfer Act, site monitoring wells will undergo a minimum of 4 quarters of Remediation Standard Regulations (RSR) compliance monitoring. Groundwater samples will be analyzed for numerous parameters, including metals, VOCs, and semivolatile organic compounds (SVOCs).

8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

X YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the Former Howe Furniture Facility, EPA ID # CTD001162858, located at 151 Woodward Avenue, Norwalk, CT 06856. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

NO - Unacceptable migration of contaminated groundwater is observed or expected.

IN - More information is needed to make a determination.

Completed by (signature) Robert W. Brackett Date 12/20/07  
(print) Robert W. Brackett  
(title) RCRA Facility Manager

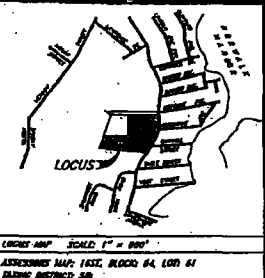
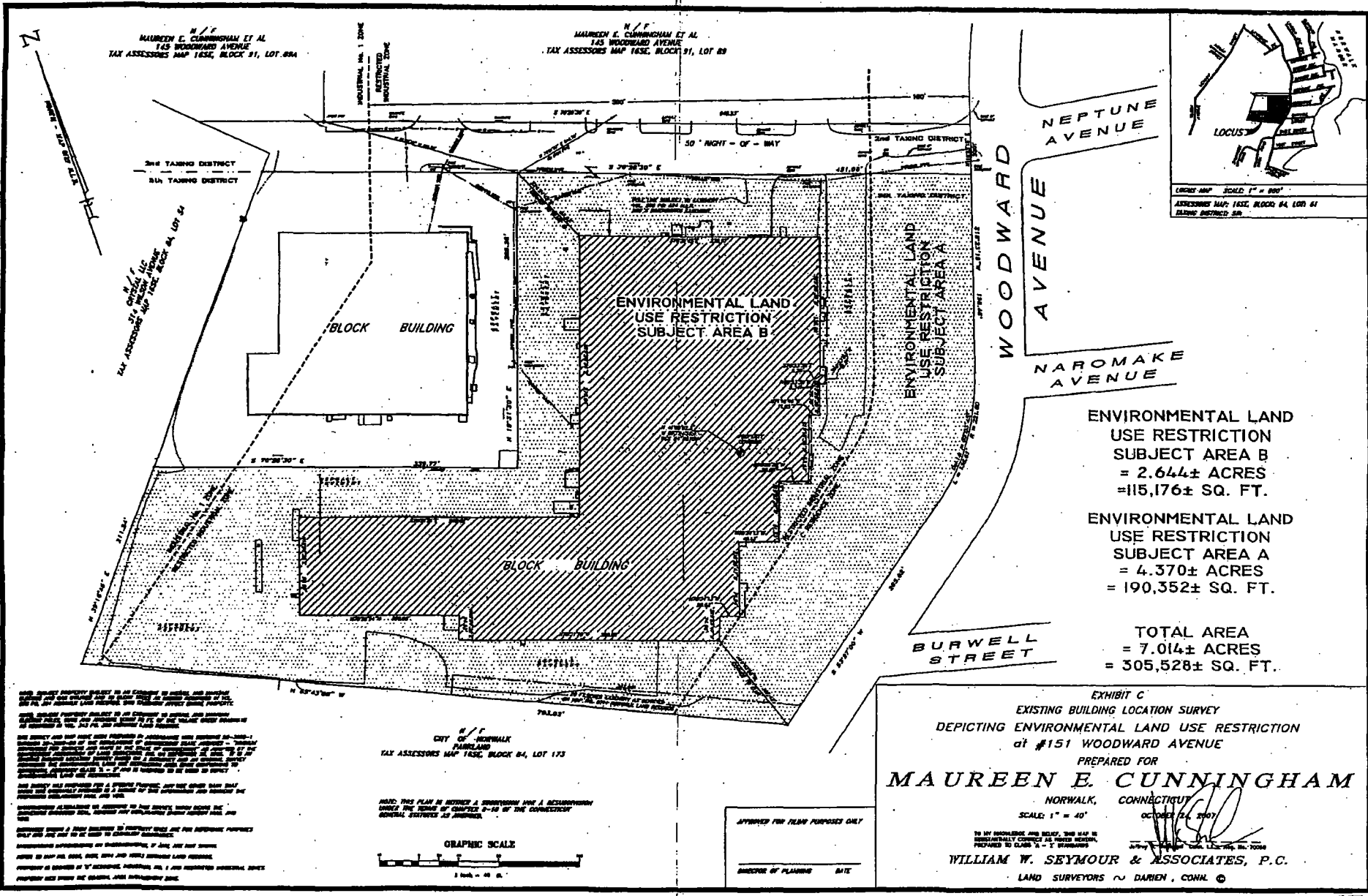
Supervisor (signature) James S. Chow Date 12/21/07  
(print) James S. Chow  
(title) RCRA Corrective Action Section Chief  
(EPA Region or State) EPA New England, Region I

Locations where References may be found:

RCRA Records Center, One Congress St. Boston, MA.

Contact telephone and e-mail numbers

(name) Bob Brackett  
(phone #) 617-918-1364  
(e-mail) Brackett.bob@epa.gov



ENVIRONMENTAL LAND USE RESTRICTION SUBJECT AREA B = 2.644± ACRES = 115,176± SQ. FT.

ENVIRONMENTAL LAND USE RESTRICTION SUBJECT AREA A = 4.370± ACRES = 190,352± SQ. FT.

**TOTAL AREA = 7.014± ACRES = 305,528± SQ. FT.**

EXHIBIT C  
 EXISTING BUILDING LOCATION SURVEY  
 DEPICTING ENVIRONMENTAL LAND USE RESTRICTION  
 at #151 WOODWARD AVENUE  
 PREPARED FOR  
**MAUREEN E. CUNNINGHAM**  
 NORWALK, CONNECTICUT  
 SCALE: 1" = 40'  
 OCTOBER 24, 2007

TO MY KNOWLEDGE AND BELIEF, THIS MAP IS  
 ACCURATELY CORRECT AS TO THE  
 PREPARED BY CLAUDIA A. T. SEYMOUR

**WILLIAM W. SEYMOUR & ASSOCIATES, P.C.**  
 LAND SURVEYORS ~ DARIEN, CONN. ©

THIS SURVEY PROPERTY SUBJECT TO ALL EASEMENTS AND RIGHTS  
 OF RECORD AND TO ALL TAXES AND CHARGES OF RECORD.  
 THE SURVEYOR HAS BEEN ADVISED THAT THE PROPERTY IS  
 SUBJECT TO A 30' RIGHT-OF-WAY FOR THE WOODWARD AVENUE  
 PROJECT, THE PLAN OF WHICH IS FILED IN THE RECORDS OF THE  
 DEPARTMENT OF CONSTRUCTION, STATE OF CONNECTICUT, AT  
 NORWALK, CONNECTICUT, ON OCTOBER 24, 2007.

THE SURVEYOR HAS BEEN ADVISED THAT THE PROPERTY IS  
 SUBJECT TO A 30' RIGHT-OF-WAY FOR THE WOODWARD AVENUE  
 PROJECT, THE PLAN OF WHICH IS FILED IN THE RECORDS OF THE  
 DEPARTMENT OF CONSTRUCTION, STATE OF CONNECTICUT, AT  
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 DEPARTMENT OF CONSTRUCTION, STATE OF CONNECTICUT, AT  
 NORWALK, CONNECTICUT, ON OCTOBER 24, 2007.

N / F  
 CITY OF NORWALK  
 PARISHLAND  
 TAX ASSESSORS MAP 145C, BLOCK 84, LOT 173

MADE THIS PLAN BY MEANS OF AERIAL PHOTOGRAPHY AND A RECONSTRUCTION  
 UNDER THE TERMS OF CHAPTERS 2-80 OF THE CONNECTICUT  
 GENERAL STATUTES AS AMENDED.



APPROVED FOR FILING PURPOSES ONLY  
 DIRECTOR OF PLANNING DATE