



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

February 23, 1993

Mr. Robert T. Pfisterer  
Production Manager  
Pfizer Incorporated  
Eastern Point Road  
Groton, Connecticut 06340

EPA I.D. No. CTD001147495

Re: Release of Contaminated Soils from RCRA Subtitle C  
Management Requirements Contingent Upon Disposal as CTDEP  
Special Waste.

Dear Mr. Pfisterer:

The Environmental Protection Agency has reviewed data submitted by Pfizer regarding certain contaminated soils that were treated above-ground using vacuum extraction. These soils were originally contaminated by listed hazardous wastes. Therefore, they are subject to management requirements pursuant to Subtitle C of the Resource Conservation and Recovery Act, as amended, 42 U.S.C. §§ 9601 et seq. However, as you are aware, EPA may make case-by-case determinations as to whether particular contaminated media, such as soil and groundwater, may be released from Subtitle C management requirements based on the level of residual risk posed by the contaminated media after treatment.

Accordingly, EPA has determined that the soils characterized in the September 22, 1992 submittal by Recra Environmental Inc. on behalf of Pfizer may be released from Subtitle C management requirements. This release is contingent upon: (1) management in accordance with State of Connecticut Department of Environmental Protection Special Waste disposal requirements, Connecticut Hazardous Waste Management Regulation 22a-209-8; and (2) written verification to EPA that such management has taken place.

Alternatively, as orally conveyed to Pfizer by EPA staff, Pfizer may propose delivering the soils to a facility that beneficially uses or reuses, or legitimately recycles or reclaims the waste, or treats the waste prior to such beneficial use, reuse, recycling or reclamation.

EPA's decision is based in part on human health risk estimates which indicate that several compounds, to wit benzo(a)pyrene, benzo(b)&(k)fluoranthene, and arsenic, are present in the soils at levels that exceed acceptable residential exposures. However, the concentrations do not exceed acceptable exposure levels under an industrial exposure scenario, such as that posed by landfill disposal.

Should you have any questions regarding this matter, please feel free to contact David Guest of my staff at (617) 223-5541.

Sincerely,



John R. Podgurski, Chief  
Connecticut Waste Regulation Section

cc: David McKeegan, CTDEP