



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

POLLUTION REPORT (POLREP)

I. Heading

Date: July 3, 2003
Subject: Carvill Combing Company Site
From: OSC Janis Tsang, US EPA, New England Region
To: Attached List
POLREP No.: 1

II. Background

Site ID No.: 01AL
Contract #/D.O. #: 68-R1-98-01/0094
Response Authority: CERCLA
ERNS No. N/A
NPL Status: Non-NPL
State Notification: CT DEP notified
Action Memo. Status: Approved, November 26, 2002
Start Date: April 9, 2003
Demobilization Date: N/A
Completion Date: N/A

III. SITE INFORMATION

A. Incident Category - Inactive Production Facility

B. Site Description

1. Site Location

The Site is located at 63 Brunswick Avenue in the Town of Plainfield (the Town), Windham County, Connecticut. Geographic coordinates are 41° 43' 01" north latitude and 71° 51' 39" west longitude. It is bordered to the north and west by the Moosup River; to the east by a public foot trail owned by the state of Connecticut and private residences, and to the south by Wagar Associates, Inc., and Brunswick Avenue Extension. It consists of an abandoned two-story brick building on a 0.4-acre parcel. The building is constructed of brick and mortar exterior walls with flooring made up of a combination of wood and concrete. Topographic relief is slight, with elevations ranging from 275 ft.

above mean sea level (msl) to 280 ft. above msl. Approximately 57 homes are located within a quarter mile. An elementary school is located approximately half a mile from the Site. Moosup River is classified as a Class A river under the Connecticut State Water Classification Program. The river is also used for various recreations including fishing.

2. Description of Threat

The Site is a former textile mill abandoned in the late 1970s. The property consists of an abandoned two-story building in a state of disrepair and one 20,000-gallon underground storage containing several hundred gallons of unknown liquid. Insulation and other building materials are suspected to contain asbestos.

C. Preliminary Assessment/Site Inspection Results

From January 16, 2001 to October 31, 2001, OSC conducted the PA/SI and noted the following:

- One 55-gallon steel drum and several miscellaneous sized containers were observed in the basement of the mill. Close inspection of the drum/containers and the remainder of the building was not conducted due to poor structural integrity of the building;
- One 20,000-gallon underground storage tank on the west bank of the Moosup River near the mill. START collected one oil sample and EPA New England Regional Laboratory (NERL) analyzed for oil identification, flash point and polychlorinated biphenyls (PCBs). The sampling result indicated no PCBs and confirmed the oil is number 6 fuel oil;
- No asbestos sampling was conducted due to the fact that an asbestos survey had been conducted and reported in October 2001 by PRP's consultant, Aaron Environmental. Asbestos-containing material (ACM) was observed in the thermal insulating material on the boiler and in the insulation debris on the floor;
- There were no physical barriers including windows, doors and fences to restrict public access to the mill;
- Two residences and a small business were located adjacent to the Site;
- Evidence including waste food and beverage containers and other domestic garbage were observed in and around the mill building indicating that there were public trespasses;
- START took two surface soil samples from the concrete drainage ditch located in the basement of the mill for polynuclear aromatic hydrocarbon (PAH) field screening. The surface soil samples were sent to NERL to be analyzed for semivolatile organic compounds (SVOC) and PCBs/pesticide and heavy metals;

- One surface soil sample detected 1400 ppm of lead.
- One surface soil sample detected total PAHs at a concentration of 51.6 ppm.

The Supplemental Environmental Site Assessment Report prepared by Aaron Environmental dated October 18, 2001 reported the following:

- chrysotile asbestos at levels ranging from <1% to 70%;
- amosite asbestos at levels ranging from 15% to 25%; and,
- crocidolite asbestos at levels of 5%.

This ACM was reportedly found in the thermal insulating materials throughout the heating system, ceiling panels, floor tiles, window glazing and in an electric cable inside the building and in shingles, tar and paper roofing on the exterior of the building.

IV. Response Information

A. Situation

1. Current Situation

No field activities had been conducted since the property owner rescinded access permission to EPA.

2. Removal Activities To-date

- From November 2002 to April 2003, correspondences received from PRPs indicated that they are financially and technically incapable of performing the cleanup.
- On April 9, 2003, Weston engineers, Weston START, ERRS Response Manager, OSC Wainberg and OSC Tsang met onsite to discuss the removal scope of work.
 - Weston engineers conducted structural evaluation of remaining structures and the connecting dam for hydroelectric power generation.
 - George Scaveles and Joseph Gabriel (OVM) along with Duncan Broatch (Summit Hydropower), Ron Hannibal (Hazardous Environment Abatement Technicians (HEAT), Inc., OVM contractor), Tim Wright (Wright Associates, OVM contractor) and Jim Beaulieu (Developer) were also onsite to meet with the OSCs indicating OVM's interest to perform the PRP-lead removal.
 - OSC Tsang stated that OVM must provide documentation demonstrating its financial capability to conduct the cleanup and regarding qualification of its

contractor to EPA and all PRP-lead cleanup work must be conducted under an EPA UAO. OVM indicated that they will furnish the necessary documentation to EPA.

- OVM granted signed access agreement to EPA.

- On April 22, 2003, OVM rescinded the access agreement to EPA.
- On April 30, 2003, HEAT applied for a demolition permit at the Town of Plainfield Building Department on OVM's behalf. The building inspector contacted OSC Tsang for information.
- On May 2, 2003, OSC Tsang and Aaron Benoit of Weston went to the perimeter of the site and noted that asbestos warning signs and asbestos caution tapes were posted along the chain-link fence by the Brunswick Avenue. Miscellaneous pieces of wooden board were noted lying on the yard outside the perimeter chain-link fence.
- On May 2, 2003, Ralph Wiech, a licenced project designer of Westerly, RI applied for an emergency permit for an alternative work practice for the removal of asbestos-containing materials from the Connecticut Department of Public Health on behalf of OVM.
- On May 7, 2003, OSC Tsang, Mike Argue of Weston START, Matt Williamson of CT DEP and Kristen Day of CT DPH Asbestos Program met with Ron Hannibal of HEAT to discuss OVM's asbestos removal application.
- On May 8, 2003, Kristen Day of CT DPH wrote to Ralph Wiech informing him that his application is incomplete and has been set aside by CT DPH until he provides additional information including work plan, health and safety plan and other pertinent information as required by EPA with his application.
- On June 23, 2003, EPA issued a UAO for access to OVM.

3. Enforcement

Notice letters under CERCLA Section 107(a) and Request for Information under CERCLA Section 104(e) were sent to the responsible parties.

B. Planned Removal Activities

- Provide site security measures (including, but not limited to, installing a new chain-link fence and/or boarding windows and doors) to restrict access. If deemed necessary by the OSC, provide security guard service.
- Conduct topographical (land and aerial) survey to establish base line reference (e.g.,

elevation) for further removal planning.

- Conduct structural evaluation of the building and implement the resultant recommendations as required in order to allow safer access to these areas for the cleanup.
- Conduct additional sampling including, but not limited to, soil sampling to further delineate the nature and the extent of contamination on-site and installation of monitoring wells. If the removal of contaminated soil is deemed necessary by the OSC, the results of the sampling will be used to estimate the volume of the waste that needs to be removed or otherwise stabilized/treated.
- Evaluate cleanup methods for the soil contamination. The method selected will eliminate the threat of direct public contact with contaminated soil and will also reduce the potential for off-site migration
- Sample, stage, analyze, remove and dispose of drums.
- Conduct asbestos removal and segregate, stockpile and dispose of asbestos-contaminated wastes to a CERCLA-approved disposal facility.
- Conduct building demolition and/or reinforcement and site stabilization/restoration activities in accordance with an engineer-designed plan.
- Perform applicable air monitoring.
- Perform applicable environmental sampling and monitoring including soil and/or water testing during the removal.
- Perform a land survey and document the Site conditions with as-built drawings if deemed necessary by the OSC.

C. Next Steps

- Coordinate with CT DEP, CT DPH, START and ERRS for asbestos removal and demolition plans.
- Commence the removal actions.

D. Key Issues

- The foundation walls of the building either contain the dam drawdown system that is an integral part of the hydroelectric dam or serve as retaining wall between the site and the river. The special demolition procedures must be implemented in order to minimize the risk of causing any damages to any of the above.

V. **COST INFORMATION**¹: As of May 30, 2003

	Project Ceiling	Estimated Expenditure	Balance
ERRS ²	\$550,000 ³	\$1,000	\$549,000
START ⁴	\$150,000	\$22,000	\$128,000
CONTINGENCY	\$140,000	\$0	\$140,000
Total	\$840,000	\$23,000	\$817,000

CASE PENDING

¹The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

²Emergency and Rapid Response Services

³The total task order ceiling is \$150,000.

⁴Superfund Technical Assistance and Response Team