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

POLLUTION REPORT (POLREP)

I. Heading

Date:	**February 18, 2004**
Subject:	**Carvill Combing Company Site**
From:	**OSCs Janis Tsang/Allen Jarrell**
	US EPA, New England Region
To:	**Attached List**
POLREP No.:	**2**

II. Background

Site ID No.:	**01AL**
Contract #/D.O. #:	**68-R1-98-01/0094**
	68-W-03-037/0010
Response Authority:	**CERCLA**
ERNS No.	**N/A**
NPL Status:	**Non-NPL**
State Notification:	**CT DEP notified**
Action Memo. Status:	**Approved, November 26, 2002/Amended, November 10, 2003**
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. See POLREP #1 for details.

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

See POLREP#1 for details.

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

EPA is planning the logistics for the asbestos removal and demolition activities while coordinating the relocation of an adjacent small business through the US Army Corps of Engineers Real Estates Division.

2. Removal Activities To-date

- On August 11, 2003, the OSC conducted a meeting/site visit with CT DEP, CT DPH and Weston Engineers to orient the CT DPH to the site conditions and to discuss EPA's proposed approach to the project. Attendees also met with the property owner, OVM, and its consultants to discuss the project approach at the neighboring Brunswick Mill Site.

- From August 19 to August 21, 2003, EPA and Weston START/Engineers conducted a topographic survey of the site and neighboring Brunswick Mill Site. On August 21, the abutter verbally rescinded permission to access his property.

- On September 11, 2003, Weston START completed the topographic survey after EPA received access permission from the abutter.

- On November 20, 2003, Weston START/Engineers conducted a site visit to reconfirm site conditions relative to design development. The visit also included a limited inspection of the building interior, flume and culvert, a dye test of drain line, and a survey of specific elevations along building perimeter.

- The Acting Director of the Office Site Remediation and Restoration approved an Action Memorandum Addendum dated November 10, 2003 by authorizing a ceiling increase and a change of scope of work to include relocation of an adjacent small business.

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

The following activities have been completed:

- Topographical (land and aerial) survey to establish base line reference (e.g., elevation) for further removal planning; and
- Structural evaluation of the building and implementation of the resultant recommendations as required in order to allow safer access to these areas for the cleanup

The following activities are on-going:

- 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 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 serves as retaining walls 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 November 30, 2003

	Project Ceiling	Estimated Expenditure	Balance
ERRS[2]	$550,000[3]	$1,000	$549,000
START[4]	$150,000	$75,000	$75,000
USACE[5]	$50,000	$5,000	$45,000
CONTINGENCY	$150,000	$0	$150,000
Total	**$900,000**	**$81,000**	**$819,000**

CASE PENDS

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[1]The 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.

[2]Emergency and Rapid Response Services

[3]TO# 0094 had a ceiling of $202,913 and is currently closed. $1000 was expended from TO#94. TO# 0010 is open and has a ceiling of $500,000. To-date, no expenditure has incurred under this TO.

[4]Superfund Technical Assistance and Response Team

[5] United States Army Corps of Engineers