



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

DATE: October 16, 2009

SUBJ: Site Investigation Closure Memorandum
Metropolitan Metal Finishing Site
400 Goodrich Street
Hamden, CT 06517

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THRU: David McIntyre, Chief *DMC*
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TO: Metropolitan Metal Finishing Site File

In accordance with section 300.410 of the National Contingency Plan (NCP), a Removal Site Evaluation, consisting of a Preliminary Assessment and Site Investigation (PA/SI), has been undertaken at the Metropolitan Metals Finishing Site ("Site") in Hamden, CT. The findings of the Removal Site Evaluation have been evaluated under the criteria set forth in section 300.415 of the NCP, section 104(a) and (b) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(a) and (b) and Clean Water Act (CWA) § 311(c)(i) as amended by the Oil Pollution Act (OPA) § 4201(a). The Removal Site Evaluation has led to the determination that a Removal Action is appropriate at this time.

The findings of the Removal Site Evaluation are outlined below.

1. Source and nature of the release or threat of release
 - a. The Removal Site Evaluation consisted of the following actions.
 - i. Review of analytical results generated by EPA's Superfund Technical Assessment and Response Team (START) contractor in 2009 and 2005 contained in "Preliminary Assessment/Site Investigation Report September 2009", sample analysis performed by the EPA Regional Lab, 11 Technology Drive, North Chelmsford, MA 01863 and Alpha Analytical, 8 Walkup Drive, Westborough MA 01581 and 'Preliminary Assessment/Site Investigation Report April 2006', sample analysis performed by the EPA Regional Lab, 11 Technology Drive, North Chelmsford, MA 01863.
 - ii. Review of photographs taken by START personnel on April 22 and May 13, 2009 and documented in the September 2009 PA/SI Report.

- iii. Review of other documents documented in the 2009 PA/SI report.
 - iv. Interviews with CTDEP and Town of Hamden Economic Development Officials.
 - v. The Site Investigations on April 22 and May 13, 2009 by OSC Janis Tsang and on November 28 and 29, 2005 by OSC Melanie Morash.
 - vi. Generating a PA/SI report by EPA's contractor, titled "*Preliminary Assessment/Site Investigation Report for the Metropolitan Metal Finishing Site, September 2009*".
 - vii. Completing PA and SI forms dated September 2, 2009.
 - viii. Review of the Metropolitan Metal Finishing Site File.
- b. Based on the information available at this time, the principal hazardous substances or pollutants or contaminants that are being released or for which there is threat of release include but are not necessarily limited to the list below.

<u>Hazardous Substances or Pollutants or Contaminants</u>	<u>Media</u>
metals (cadmium, copper, lead, nickel, zinc)	particulate material, powders, residues
cyanide	particulate material, powders, residues
metals (cadmium, chromium, copper, nickel, zinc)	aqueous liquid
cyanide	aqueous liquid
mercury	switches, fluorescent lights, round high- intensity lights
polychlorinated biphenyls (PCBs)	fluorescent light fixture ballasts

2. Evaluation of the threat to public health, welfare and the environment

a. Federal Agency for Toxic Substances and Disease Registry:

Threat _____ No Threat _____ Evaluation Not Necessary X

b. Endangerment to the ecosystem:

Threat _____ No Threat _____ Evaluation Not Necessary X

3. The Removal Site Evaluation was terminated pursuant to section 300.410(f) of the NCP for the following reason(s).
- ☐ There is no release.
 - ☐ The source is neither a "vessel" nor a "facility" as defined in section 300.5 of the NCP.
 - ☐ The release involves neither a hazardous substance, nor a pollutant or contaminant that may present an imminent and substantial danger to public health or welfare of the United States.
 - ☐ It is subject to the limitations on response specified in §300.400(b)(1) through (3). The release is
 - ☐ of a naturally occurring substance in its unaltered form, or altered solely through naturally occurring processes or phenomena, from a location where it is naturally found.
 - ☐ from products that are part of the structure of, and result in exposure within, residential buildings or businesses or community structures.
 - ☐ into public or private drinking water supplies due to deterioration of the system through ordinary use.
 - ☐ The amount, quantity, or concentration released does not warrant a Federal response.
 - ☐ A party responsible for the release, or any other person, is providing appropriate response, and on-scene monitoring by EPA is not required.
 - ☒ The Removal Site Evaluation is complete.
4. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its completion, and not for other reasons.
- a. The factors listed below, found in Section 300.415(b)(2) of the NCP, are applicable to this Site.
 - ☒ Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.
 - ☐ Actual or potential contamination of drinking water supplies or sensitive ecosystems.
 - ☒ Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.

- () High levels of hazardous substances, pollutants or contaminants in soils, largely at or near the surface, which may migrate.
 - (X) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
 - () Threat of fire or explosion.
 - (X) The availability of other appropriate Federal or State response mechanisms to respond to the release.
 - () Other situations or factors that may pose threats to public health or welfare of the United States or the environment.
- b. The existence of the conditions specified in Section 4.a., above, indicate that a Removal Action under section 300.415 of the NCP **is** necessary.

In a 1997 Removal Action EPA removed 169 drums and containers of hazardous wastes, approximately 7,000 gallons of cyanide-containing plating wastes and approximately 18,000 gallons of wastewater from the building basement. At the time residues were left in many tanks and on the building floors.

Since that time the basement has refilled with water that is contaminated with residues. Repeated attempts by local authorities to secure the building from trespassers and transients have failed and there is evidence that homeless persons are living in the building.

- c. In light of the magnitude of the threat or potential threat to health, welfare, or the environment, the appropriate categorization of a Removal Action at this Site is:

Emergency____ Time-Critical X Non Time-Critical____

5. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its completion, and not for other reasons.

- a. As found in section 300.410(e)(1) of the NCP, the OSC shall determine whether a release governed by CWA section 311(c)(1), as amended by OPA section 4201(a), has occurred.
 - () There is a release, or potential threat of release, as governed by the CWA as amended by OPA.
 - (X) There is not a release, or potential threat of release, as governed by the CWA as amended by OPA.
- b. The absence of the conditions specified in Section 5.a., above, indicate that an Oil Spill Response under Appendix E to Part 300 of the NCP **is not** necessary. There is no oil release.

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