

United States Environmental Protection Agency
Region I
POLLUTION REPORT

Date: Thursday, July 3, 2003
From: Allen Jarrell

Subject: Brunswick Mill Site
57-59 Brunswick Avenue, Plainfield, CT
Latitude: 71.8622000
Longitude: -41.7172000

POLREP No.:	1	Site #:	01AK
Reporting Period:	11/26/2002 - 06/30/2003	D.O. #:	0093
Start Date:	4/9/2003	Response Authority:	CERCLA
Mob Date:		Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	CTN000103152	Contract #	68-R1-98-01
RCRIS ID #:			

Site Description

Site Location

The 9.6 acre Brunswick Mill Site (Site), located at 57-59 Brunswick Avenue in a residential area of the town of Plainfield, Windham County, Connecticut, is bordered to the north by the Moosup River and North Main Street (Route 14); to the east by the Moosup River; to the south by Brunswick Ave., a private residence, and a Town sewer pump station; and to the west by private residences. The site includes an abandoned two-story office building, a demolished three-story mill building, and a garage. The abandoned mill building had been destroyed by a fire in 2000, but the northern and eastern portions of the mill remain largely intact. The majority of the mill building is in a state of disrepair with portions having collapsed onto themselves or into the Moosup River, a Class A river under the Connecticut State Water Classification Program. The river is used for fishing and various other recreational activities. Approximately 57 homes are located within a quarter mile. An elementary school is located approximately half a mile away.

Description of threat

The Site was owned and operated by a defunct business, Brunswick Worsted Mills, Inc. (Brunswick) and is located adjacent to another mill operated by a related company, Carvill Combing Company (Carvill). Industrial operations took place at both facilities from the 1890s until the 1970s.

On October 21, 2000, a fire broke out and destroyed the abandoned mill building. After the fire, the three story structure began to collapse. On October 23, 2000, the town of Plainfield hired a construction company to stabilize the building. In the course of performing this work, the construction company discovered abandoned transformers and exposed asbestos, and immediately ceased operations. The fire had also caused asbestos from the building to be released into the environment. Subsequently, CT DEP and the Town referred the Site to EPA's Removal Program.

Preliminary Assessment/Site Inspection Results

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

- Public access to the Site from Brunswick Ave. was unrestricted due to gaps in the perimeter fence. Pedestrian access was unrestricted from the north, though there was a gate to restrict vehicular access.

- Miscellaneous piles of building debris containing asbestos were scattered throughout the property. Asbestos was noted at concentrations ranging from <1% to 70% in the Supplemental Site Assessment Report dated October 18, 2001 prepared by Aaron Environmental for the PRP.
- Two propane cylinders located outside the boiler room along the eastern wall of the mill appeared to be plumbed into the boiler room.
- One 55-gallon polyethylene drum labeled "acetic acid" was located in the basement of the eastern portion of the mill.
- Two 20,000-gallon underground storage tanks (USTs) were located in a concrete containment area behind the northern portion of the mill.
- A mixed debris pile of industrial and household waste was located behind the garage.
- One 5-gallon pail of unknown material with a Department of Transportation (DOT) Class 3 Flammable Liquids label was found.
- Two small areas covered with ash-like material, one of which was located on the west bank of the Moosup River, and the second of which was located at the top of the hill in the wooded area north of the mill, were found.
- An open water pit was located at the top of the hill north of the mill.

START took nine (9) surface soil, three (3) subsurface soil and two (2) debris samples at various locations throughout the Site, and one (1) water sample from the water pit. Analytical results with above background levels are indicated below:

Subsurface soil - Acetone - 6.1 to 14 ppm

Surface water sample (taken from the water pit) - Acetone - 25 ppm

Ash - Total polynuclear aromatic hydrocarbons (PAHs) - <10 to 51 ppm

Ash - Beryllium - 3.9 to 4.6 ppm

Current Activities

Current Situation

There is no field activity on-site while EPA continues to work on obtaining access to the property.

Activities since the action memorandum was signed:

- From November 2002 to April 2003, correspondence 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, Assistant OSC Dan 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 OSC 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 Unilateral Administrative Order (UAO). OVM indicated that they would furnish the necessary documentation to EPA.

- OVM signed an EPA access agreement.

• On April 22, 2003, OVM rescinded the access agreement to EPA.

• On April 30, 2003, HEAT applied for a demolition permit at the 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 noted that asbestos warning signs and asbestos caution tapes were posted along the chain-link fence by 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 licensed project designer from Westerly, RI, applied to the Connecticut Department of Public Health on behalf of OVM for an emergency permit to remove asbestos-containing materials using an alternative work practice.

• 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 had been set aside by CT DPH until he provided additional information including a 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.

Planned Removal Actions

• Provide site security measures (including, but not limited to, repairing existing chain-link fence and/or installing a new chain-link fence) 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, the dam and its hydroelectric power plant and implement the recommendations as required in order to allow safer access to these areas for the cleanup.

• Conduct additional sampling including, but not limited to, conducting soil, water and sediment sampling to further delineate the nature and the extent of contamination on-site and installation of monitoring wells. The sampling results would be used to estimate the volume of waste that needed to be removed or otherwise stabilized/treated.

• Sample, stage, analyze, remove and dispose of drums.

• Segregate, stockpile and dispose of asbestos-contaminated debris to a CERCLA-approved disposal facility.

• Evaluate cleanup methods for the water pit and soil contamination. Data obtained from sampling soil, water and sediment will be used to determine the appropriate removal cleanup methods. The removal methods to be considered include removing (via excavation, treatment and disposal), or otherwise stabilizing the contaminated soils and/or a combination of all of the above. The method selected will eliminate the threat of direct public contact with contaminated soil and will also reduce the potential for off-site migration.

• 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.

Next Steps

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

Key Issues

Some of the masonry wall of the mill building serves as the hydroelectric dam wing wall. Special demolition procedures must be implemented in order to minimize any major vibrations that could cause the masonry below the dam forebay water level to leak.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$900,000.00	\$1,000.00	\$899,000.00	99.89%
START	\$300,000.00	\$24,000.00	\$276,000.00	92.00%
CONTINGENCY	\$240,000.00	\$0.00	\$240,000.00	100.00%
Intramural Costs				
Total Site Costs	\$1,440,000.00	\$25,000.00	\$1,415,000.00	98.26%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. 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.

response.epa.gov/BrunswickMill

POLREP #1 Last Updated 4/21/2004