

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Metropolitan Metals Finishing Site - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: POLREP #1
Initial
Metropolitan Metals Finishing Site
014L
Hamden, CT
Latitude: 41.3357326 Longitude: -72.9344964

To: Polrep Distribution, USEPA-R1

From: Michael Barry, OSC

Date: 2/11/2010

Reporting Period: 2/4/2010 to 2/10/2010

1. Introduction

1.1 Background

Site Number:	014L	Contract Number:	EP-W-08-061
D.O. Number:	0016	Action Memo Date:	1/20/2010
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	2/10/2010	Start Date:	2/10/2010
Demob Date:		Completion Date:	
CERCLIS ID:	CTD001183052	RCRIS ID:	
ERNS No.:		State Notification:	2/10/2010
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time Critical Removal Action.

1.1.2 Site Description

The Site is an abandoned, privately operated metal finishing business that went out of business in 1996, and has been abandoned since. The building has deteriorated in the intervening years; there is a hole in the roof which has allowed the basement to be filled with precipitation. Evidence of use as living quarters by local indigents was observed despite repeated efforts by local authorities to secure it by boarding up windows, installing locks, and adding police patrols. Residual plating shop contaminants and sludge in vats, tanks, and throughout the building present a hazard to the indigent residents.

The building is a one-story structure of approximately 18,000 square feet with a 1000 square foot basement on approximately 0.5 acres. In addition to metal plating process residues, It contains general debris, solid waste, and biological waste composed of food scraps and human waste from indigents' use of the facility as living quarters. The basement is flooded with about six feet of water, obstructing assessment of hazardous materials that may be in it.

1.1.2.1 Location

The Site is located in a mixed residential and commercial area adjacent to residential properties and a new greenway/recreational path on a former rail right-of-way. The address is 400 Goodrich St, Hamden, CT 06517 or 75 Daisy St, New Haven, CT 06511; the geographic position is 41 20.08' N, 072 56.04' W.

1.1.2.2 Description of Threat

Residual metal plating chemicals, sludge and residues present a contact hazard to local indigents using the Site as living quarters. Concentrations of metal contaminants on Site are above the CTDEP direct contact criteria for residential and commercial exposure scenarios. Due to the use of the site building, residential exposure scenario is appropriate. Mercury and PCB containing switches and fixtures are throughout the site building. Due to their degraded condition release of their contents to the building and environment is likely; thus exposing the building squatter residents and community.

The Site building has become a haven for local indigents' use as a living quarters and drug usage despite repeated attempts to secure it by town authorities. The activities result in a threat to public health and

sanitation directly to those engaging in these activities and to the neighborhood and community as a whole. Indigents' attempts to heat and cook with fires and heaters and the large amount of solid debris and waste on site pose a threat of fire which could mobilize the contaminants on site and release them to the environment.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The Site contains approximately 85 metal plating vats with residual contaminants, several tanks, process piping, and fixtures containing hazardous contaminants that are in poor condition. Not including the basement, which couldn't be inventoried; the following additional hazardous wastes and materials were identified; PCB and mercury containing light fixtures and switches and biological waste.

A total of 44 solid samples were collected inside the building from metal plating vats, tanks, the floor, walls and other components. The samples were analyzed for Resource Conservation and Recovery Act (RCRA) 8 metals, poly chlorinated biphenyls (PCB's), asbestos, hexavalent chromium, cyanide and Toxicity Characteristic Leaching Procedure (TCLP) metals analysis. The contaminants present a risk to indigent and homeless resident trespassers because they exceed CTDEP Residential and/or Commercial/Industrial Standards; analytical results for the highest result are shown below. CTDEP Residential Remediation Standard Regulation (RSR) and CTDEP Commercial/Industrial Direct Exposure Criteria (DEC) are provided for comparison:

Contaminant	Result, parts per million (ppm)	CTDEP RSR, Residential, ppm	CTDEP DEC, Commercial/Industrial, ppm
Antimony	170	27	8200
Cadmium	660	34	1000
Chromium (Total)	12,000	3900	51,000
Copper	180,000	2500	76,000
Lead	980	500	1000
Nickel	540,000	1400	7500
Zinc	190,000	20,000	610,000
Cyanide	40,000	1400	41,000

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Personnel conducted a site walk with 2 EPA OSC and the ERRS RM on 2/4/2010 to verify site conditions and then commenced lining up resources. On 2/10/2010 2 EPA OSC, 4 ERRS and 1 START

personnel mobilized to the site and commenced set-up operations.

2.1.2 Response Actions to Date

A site walk was performed on 2/4/2010. On 2/10/2010 site security was set, HiViz fence installed, trailer delivered, generators and misc. equipment on site. Air monitoring for particulates with DustTrak 8520 units cleared the site as below the action level of 10% of the OSHA PEL. ERRS started sealing building open penetrations such as windows, roof gaps, etc. in preparation for a heater unit. ERRS also started clearing and segregating solid debris for internal site access.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The PRP's estate has been identified and provided access consent.

2.1.4 Progress Metrics

None to date, see section 2.1.2

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Remove hazardous material debris and other superficial contamination from building.
Remove visible chemical residues present on vats and other process equipment and remove all vats and tanks.
Thaw, pump out and remove potentially contaminated liquids.
Segregate and remove, recycle or stage solid waste obstructions, debris, scrap and tumbler components.
Perform air monitoring to ensure worker and public safety.

2.2.1.2 Next Steps

Continue setting up staging areas, decontamination area, support zone.
Seal the building for heating and to prevent the migration of fugitive dust.
Obtain electric power via genrators then line power.
Procure industrial heater to thaw out fluids and heat site.
Start segregating wastes and staging for removal.
Assess site T&D needs.
Install temporary fence and repair roof.
Secure site safety hazards.
Contract for off-hours site security.

2.2.2 Issues

Large amount of interffering solid waste and debris.
Line electric power.
Disposal of liquid wastes to the New Haven Water Control Authority treatment plant.
Recyclable material disposal.

2.3 Logistics Section

START in process of renting 5 AreaRAE's and control unit.
ERRS in process of procuring 85 kw generator, industrial heater, bobcats and other material movement gear.
More personnel to arrive on site the week of 2/15/2010.
OSC coverage set.

2.4 Finance Section

2.4.1 Narrative

An intial TO of \$250,000 has been issued. The first 1900-55 is expected the week of 2/15/2010.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				

ERRS - Cleanup Contractor	\$573,412.00	\$0.00	\$573,412.00	100.00%
TAT/START	\$76,154.00	\$0.00	\$76,154.00	100.00%
Intramural Costs				
USEPA - Direct	\$59,344.00	\$0.00	\$59,344.00	100.00%
USEPA - InDirect	\$395,677.00	\$0.00	\$395,677.00	100.00%
Total Site Costs	\$1,104,587.00	\$0.00	\$1,104,587.00	100.00%

* 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.

2.5 Other Command Staff

2.5.1 Safety Officer

The site contains many physical hazards including slips, trips and falls (SLT). The SLT hazards are also present outside of the building due to recent winter weather. These hazards are being mitigated with engineering controls, including clearing of walkways & work areas of equipment & debris and marking, identifying or barricading other obstructions. Cold stress is also a potential hazard. Monitoring will be conducted for cold stress and proper work/rest schedules will be maintained. In addition, site security is being addressed by controlling unauthorized access to the site and work zones using fencing, caution tape and overnight site security. Interior and exterior air monitoring is being performed during site activities.

2.6 Liaison Officer

Liaison with the Hamden Director of Economic and Community Development Director, CTDEP and CTDPH has been undertaken and is ongoing.

2.7 Information Officer

2.7.1 Public Information Officer

No action.

2.7.2 Community Involvement Coordinator

Outreach was performed with the resident immediately abutting the site.

3. Participating Entities

3.1 Unified Command

Unified command isn't being used for this site, but there is a high degree of liaison with cooperating agencies.

3.2 Cooperating Agencies

Hamden City Economic and Community Development Department
CTDPH
CTDEP

4. Personnel On Site

EPA OSC - 2
START - 1
ERRS, ER, LLC - 2
ERRS, Moran (Team sub) - 2

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.