

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Omo Manufacturing Site - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: **POLREP #1**
Initiation of the Action
Omo Manufacturing Site
01M3
Middletown, CT
Latitude: 41.5565804 Longitude: -72.6392459

To:
From: Janis Tsang, On-Scene Coordinator
Date: 3/31/2010
Reporting Period: February 9 to March 31, 2010

1. Introduction

1.1 Background

Site Number:	01M3	Contract Number:	EP-W-08-061
D.O. Number:	0018	Action Memo Date:	2/9/2010
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:		Start Date:	3/18/2010
Demob Date:		Completion Date:	
CERCLIS ID:	CTD062199369	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time Critical Removal Action.

1.1.2 Site Description

The Omo Manufacturing Site (the Site) is 10.2-acre property which consists of two buildings (Buildings Nos. 1 and 2) on the eastern/southeastern sides of the property, an open yard to the west of the buildings, and a parking area/vacant lot east of Walnut Street. Building No. 1 is located on the northeastern portion of the Site and is approximately 35,600 square feet. Building No. 2 is located on the southeastern portion of the Site and is approximately 18,600 square feet. The property owner currently leases to several small businesses and private individuals that utilize the space for various type of activities including woodworking; autobody repair; construction contracting; landscaping company, antique collections; storage; and/or office space.

Both on-site buildings have been modified and expanded in stages, creating numerous partitioned spaces that are linked through a maze of hallways and entrances. The open yard, once known to be used as a landfill, is approximately 4-acres in size. It is currently used for staging various pieces of heavy equipment, vehicles in various states of disrepair, disabled trailers, a "diner" trailer, and miscellaneous construction debris and materials such as fill, concrete blocks, and scrap steel.

A discontinuous fence surrounds the Site, with openings in the northwest corner and along the western edge of the Site. An asphalt/dirt access road located immediately west of the buildings runs from the River Road entrance, south, following the edge of the two buildings and exiting on Walnut Street through a pair of locked swing gates. Several above-ground storage tanks (ASTs) with approximately 5,000 gallons or greater are adjacent to the buildings. The nearest residence is located east of Building No. 2. A parking area is located east of the Building No. 1, east of Walnut Street.

1.1.2.1 Location

The Site is located at 50 Walnut Street, in Middletown, Middlesex County, Connecticut (CT). The geographical coordinates of the site, as measured from its approximate center, are 41° 33' 23.1" north latitude and 72° 38' 25.6" west longitude. The property is identified by the City of Middletown (the City) Tax Assessor's Map Number (No.) 34, as Block No. 24-7, Lot No. 9. The Site is bordered to the north by River Road, railroad tracks, and the Connecticut River; to the east by Walnut Street and residential properties; to the south by

Route 9 and state-owned land; and to the west by Sumner Brook, a small drainage ditch, Route 9, and state-owned land.

1.1.2.2 Description of Threat

The Site was originally the location of Omo Manufacturing Company, a rubber and artificial leather factory that was built in the late 1800s. Prior to the 1930s, a 2- to 4-acre wetland area was located in the western portion. From the early 1930s to approximately 1955, the wetlands were used by the City of Middletown (the City) as a municipal landfill (the City Landfill). According to Mr. JR Marino, the City Landfill accepted industrial waste from various facilities. Waste oils, paints, and refuse from the on-site rubber manufacturing process were also allegedly disposed of west of Building No. 1. In 1955, during the construction of Route 9, the State of Connecticut altered the topography, including modifying the course of Sumner Brook and constructing a drainage ditch, located west of and adjacent to the Site.

On May 17, 1983, Connecticut Department of Environmental Protection (CT DEP) Waste Engineering & Enforcement Division (WEED) received a general environmental complaint alleging that a pit had been excavated near the western portion of the Site and that approximately 200 to 300 55-gallon drums of chemicals had been buried in the pit. The complaint also cited several companies for disposing of waste on the Site, including Omo Manufacturing, Middletown Rubber, Middletown Industries, and Hildebrand Industries. Chemicals allegedly disposed of include acetone, methyl ethyl ketone (MEK), naphthalene, and xylene.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

At the request of CTDEP the EPA Removal Program conducted a Preliminary Assessment/Site Investigation (PA/SI) from April to December 2009. This included collecting surface and subsurface soil, groundwater, and buried container samples. The sampling results shown in the table below confirmed the presence of hazardous materials including VOCs, SVOCs, PCBs, and metals.

Substances	Range of concentrations in soil (ppm)	Range of concentrations in product (ppm)	CT RSR I/C DEC ¹ (ppm)	CT RSR PMC ² GB areas (ppm unless unit specified)
PCBs (Aroclor-1260)	740 to ND **	8100 to 230	10	0.005 ⁴ mg/l
Lead	3700 to 190 ***	3100 to 160	1000	0.15 ⁴ mg/l
Arsenic	110 to ND ***	ND	10	0.5 ⁴ mg/l
2-Butanone (MEK)	2300 to ND	97000 to 5300	1000	80
2-Propanone (acetone)	190 to ND	440 to ND	1000	140
4-Methyl-2-Pentanone (MIBK)	1800 to ND	11000 to 1140	1000	14
Benzene	170 to ND	35000 to ND	200	0.2
Chlorobenzene	110 to ND	ND	1000	20
Ethylbenzene	250 to ND	1090 to ND	1000	10.1
Isopropylbenzene	23 to ND	120 to ND	1000	132
Total Xylene *	1500 to ND	7800 to 470	1000	19.5
N-Butylbenzene	72 to ND	380 to ND	1000	14
N-Propylbenzene	55 to ND	340 to ND	1000	14
Naphthalene	17 to ND	95 to ND	2500	56
Para-Isopropyltoluene	38 to ND	230 to ND	1000	41.8
Sec-Butylbenzene	38 to ND	170 to ND	1000	14
Tetrahydrofuran	540 to ND	26000 to ND	NA	NA
Toluene	8200 to ND	160000 to 11000	1000	67
1,2,4-Trimethylbenzene	360 to ND	2900 to ND	1000	70
1,3,5-Trimethylbenzene	140 to ND	910 to ND	1000	70
Tert-Butylbenzene	ND	21 to ND	1000	14
trichloroethylene	ND	30 to ND	520	1
Vinyl chloride	ND	25 to ND	3	0.4
Bis(2-ethylhexyl)phthalate	22000 to 0.78	38000 to ND	410	11
Butylbenzylphthalate	40 to ND	25000 to 22	2500	200
Di-n-octyl phthalate	1600 to ND	2100 to ND	2500	20

Notes:

(1) CT RSR PMC = Connecticut Remediation Standards Regulation Pollutant Mobility Criteria (in part-per-million, ppm)

(2) CT RSR I/C DEC = Connecticut Remediation Standards Regulation Industrial/Commercial Direct Exposure Criteria (ppm)

(3) NA = Not available

(4) PMC for heavy metals and PCBs by Toxicity Characteristic Leachate Procedure (TCLP) or Synthetic Precipitation Leachate Procedure (SPLP) in milligram per liter

(5) ND = Not detected

* Total Xylene = M/P Xylene +Ortho Xylene lab result values

** Results of both field screening and fixed laboratory analysis for PCBs

*** Results of both field XRF screening and fixed laboratory analysis for metals

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On February 9, 2010, the Director of the Office of Site Remediation and Restoration signed an Action Memorandum authorizing a time-critical removal action with an extramural removal project ceiling of \$1,750,000.

On March 18, 2010, OSC Tsang, the Emergency Rapid Response Service (ERRS) Response Manager (RM) and members of the Superfund Technical Assistance and Response Team (START) conducted a site walk to verify site conditions and begin planning removal activities. The mobilization of personnel and equipment and the commencement of the removal action are currently on hold pending the receipt of the signed access agreements from the property owner and tenants.

2.1.2 Response Actions to Date

Since the referral of the Site by CTDEP in April 2009, EPA has conducted groundwater sampling of the on-site monitoring wells, geophysical survey utilizing EM-31 and magnetometer at the northwestern portion of the Site [herein described as Area of Investigation 1 (Area 1)], excavation of six (6) test pits in Area 1, sediment sampling at the drainage ditch and Sumner Brook, and surface soil sampling.

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

The Site is owned by RLO Properties Inc., % Mr. J.R. Marino. Mrs. Tamba Marino is the president of American Contractors, LLC, which operates on the Site. On March 15, 2010, EPA sent access request letters to the 14 business tenants.

2.1.4 Progress Metrics

No off-site disposal of wastes was conducted during this reporting period.

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

The planned response activities for this removal action will include the following:

- Conduct a site walk with the Emergency Rapid Response Service (ERRS) cleanup contractor for removal planning.
- Conduct gross decontamination of on-site heavy equipment, vehicles and other materials that can be decontaminated before relocating them off-site for staging.
- Conduct transportation and disposal of materials that are currently staged on-site but cannot be decontaminated.
- Assemble a relocation team if necessary.
- Conduct boundary and topographical (land and aerial) surveys to establish base line references (e.g., elevation) for removal planning when deemed necessary.
- Conduct geophysical surveys to locate additional areas of buried drums/containers.
- Conduct residential vapor intrusion studies if deemed necessary to assess conditions.
- Collect additional samples as needed for extent-of-contamination estimates. This may include, but not be limited to, soil samples, a soil gas survey to further delineate the extent-of-contamination, and drinking water sampling at nearby public and private drinking water wells.
- Evaluate cleanup methods using data obtained from soil and water samples. The possible options to be considered include capping, removing (via excavation, treatment and disposal), or otherwise stabilizing the contaminated soils, and/or a combination of all of the above.
- Conduct applicable groundwater monitoring.
- Conduct sampling and removal of buried drums, containers, or debris, as necessary to accomplish removal action objective.
- Provide erosion control measures where necessary.
- Provide site security if deemed necessary.
- Perform de-watering and water treatment operations to facilitate excavation if necessary.
- Perform applicable air monitoring.
- Perform applicable environmental sampling and monitoring, including soil and/or water testing.

- Conduct stabilization/restoration activities at areas disturbed/damaged by the removal activities.

2.2.1.2 Next Steps

- Conduct a meeting with the PRPs to discuss the removal activities.
- Obtain signed access agreements from the property owner and its tenants.
- Collect samples from each of the stockpiled materials to be sure that the materials are not contaminated.
- Coordinate with USACE for appraisal and relocation services for relocating the equipment, vehicles and stockpiled materials to an offsite location.
- Coordinate with ERRS to evaluate options for transport and disposal of debris piles if necessary.
- Prepare for mobilization of personnel and equipment to set up the command post, the support area, the work zone, and the contamination reduction zone.

2.2.2 Issues

The Site is currently occupied and used by various business tenants. The property owner insisted that any communication with the tenants must be coordinated through him and his lawyer. The coordination process for access has been very slow which continued to impact the schedule of the removal action.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

2.6 Liaison Officer

EPA Congressional Liaison is assisting the OSC to address any inquiries received from the offices of Congresswoman DeLauro, Senator Lieberman and Senator Dodd.

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

Due to the discovery of the surface soil contamination in August 2009, EPA distributed a fact sheet prepared by the CT Department of Public Health in October 2009 to the on-site workers and tenants and nearby residents. The OSC will continue to coordinate with the Community Involvement Coordinator (CIC) to do outreach and/or address any community concern as arise.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

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.