

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: **POLREP #4**
Continuation of Action, Demobilization
Metropolitan Metals Finishing Site
014L
Hamden, CT
Latitude: 41.3357326 Longitude: -72.9344964

To: Polrep Distribution, USEPA-R1

From: Michael Barry, OSC

Date: 4/16/2010

Reporting Period: 3/27/2010 - 4/16/2010

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:	4/16/2010	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; clean up operations started on 2/11/2010 and the site was demobilized on 4/16/2010.

2.1.2 Response Actions to Date

2/04/2010 - 3/26/2010 - See POLREPS 1, 2 and 3.

3/27/2010 - 4/16/2010

- All approximate 85 vats on the main floor have been decontaminated and cut up for scrap metal recycling disposal. Other metal components of opportunity have been decontaminated and cut/deconstructed for volume minimization. A total of nine 20-cuyd containers were filled and shipped.
- Non-hazardous and hazardous debris/waste separation is complete in the basement and main floor. A total of nine 30 cuyd containers of non-hazardous debris were filled and shipped.
- Eight drums of potentially hazardous vat scrapings/floor sweepings & decontamination debris were collected and shipped off site on 4/9/2010. Though these contain heavy metals per prior sampling, the sample for disposal passed Toxicity Characteristic Leaching Procedure (TCLP) testing for disposal.
- Miscellaneous small container hazardous materials were collected and disposed of.
- One drum of PCB-containing light ballasts were collected and shipped off-site on 4/9/2010.
- One pail of mercury containing items was collected and shipped off-site on 4/9/2010.
- One drum of non-PCB-containing light ballasts were collected and shipped off-site on 4/9/2010.
- One drum of high intensity discharge lamps was collected and shipped off-site on 4/9/2010.
- Eight boxes of 8' fluorescent light tubes were collected and shipped off-site on 4/9/2010.
- Plasma torch cutter was demobilized on 3/29/2010.
- Floor drain waterflow pathways to the basement were plugged.
- Two poly vats in the basement were cut up and removed. Metal vats in the basement were holed to their bottoms so that rainwater will not collect in them.
- The 120 kw generator, forklift, porta-johns and other misc supplies and equipment were demobilized on 4/14/2010. The office trailer was demobilized on 4/16/2010.

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. Amounts below are approximate, preliminary figures as of POLREP date:

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Non-Haz, 30 cuyd containers; 9 total	Solid	100,000 Lbs. (estimate)	N/A	None	Pine Ave Landfill Niagra Falls, NY
Scrap Metal, 20 cuyd containers; 9 total	Solid	67,000 Lbs. (estimate)	N/A	None	Sims Metal Management, North Haven, CT
Basement and Vat Water	Liquid	100,000 + 2000 Gallons	N/A	None	Sanitary Sewer, Greater New Haven Water Pollution Control Authority
Vat Scrapings/Floor Sweepings, 8 Drums	Solid	2400 Lbs. (estimate)	006756710 JJK	None	Vexor Technology, Inc., Medina, OH 44256
Universal Waste; PCB Ballast, Mercury Lamps, HID Lamps, Misc Wastes; 3 Drums, 1 Pail, 8 Boxes	Solid	2905 Lbs. (estimate)	006756711 JJK, none	None	Complete Recycling Solutions, Fall River, MA 02720

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

On-site actions are complete.

2.2.1.2 Next Steps

- Receive last weight slips and manifest copies.
- Tally final costs.
- Draft Removal Action Completion Report and forward copies to partnering state and local agencies.

2.2.2 Issues

- Line electric power was never obtained in a timely manner, used a 120 kw generator the whole time.

2.3 Logistics Section

No Issues

2.4 Finance Section

2.4.1 Narrative

An intial ERRS TO of \$250,000 and a TO Modification of \$50,000 have been issued for a total of \$300,000. There won't be any additional ERRS TO modificatons for this site. ERRS 1900-55's through the week ending 5/11/2010 have been received for \$244,174.

START TDD's of up to \$112,958 have been issued, which commits \$36,804 of the potential \$162,391 extramural contingency authorized.

Relative to the AM Extramural Ceiling of \$649,556, unobligated extramural funds total \$236,608.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				

ERRS - Cleanup Contractor	\$573,412.00	\$244,174.00	\$329,238.00	57.42%
TAT/START	\$76,154.00	\$112,958.00	(\$36,804.00)	-48.33%
Intramural Costs				
USEPA - Direct	\$59,344.00	\$50,000.00	\$9,344.00	15.75%
USEPA - InDirect	\$395,677.00	\$0.00	\$395,677.00	100.00%
Total Site Costs	\$1,104,587.00	\$407,132.00	\$697,455.00	63.14%

* 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.

HASP amendment #1 was issued on 3/5/2010 to address plasma torch cutting operations. On 3/24/2010 full face shield APRs were specified for cutting operations with the Sawzall power saw.

2.6 Liaison Officer

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

Four CTDEP Brownfields Program personnel toured the site on 4/7/2010.

A variety of CTDEP, Hamden Community and Economic Board (HCED) members and follow-on Brownfields Program Project personnel toured the site on 4/9/2010.

HCED Board members and potential future purchasers for the Brownfields Program Project toured the site on 4/12/2010.

2.7 Information Officer

2.7.1 Public Information Officer

An article about the site from the tour on 3/19/2010, and follow-on questions with EPA PIO and OSC support was in the New Haven Register on Sunday, 4/4/2010.

2.7.2 Community Involvement Coordinator

Outreach has continually been performed with three residents 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

CTDEP

CTDPH

Hamden City Economic and Community Development Department

Quinnipiac Valley Health District

4. Personnel On Site

EPA OSC - 1 (per coverage schedule)

START - 1

ERRS, ER, LLC - 3

ERRS, Moran, LLC (Team sub) - 3

5. Definition of Terms

N/A

6. Additional sources of information

6.1 Internet location of additional information/report

Public Administrative Record Repositories are located at the New Haven Public Library (133 Elm St, New Haven, CT, 06510) and the Miller Memorial Library (2901 Dixwell Ave., Hamden, CT 06518).

The website for additional information is: <http://www.epaosc.org/MetMetalsHamdenCT>

6.2 Reporting Schedule

N/A

7. Situational Reference Materials

N/A

POLREP #4 Last Updated 4/16/2010