

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: POLREP #2
Progress
Omo Manufacturing Site
01M3
Middletown, CT
Latitude: 41.5565804 Longitude: -72.6392459

To:
From: Janis Tsang, On-Scene Coordinator
Date: 3/26/2013
Reporting Period: 1 April 2010 to 13 March 2013

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). It is believed that 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 17 May 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 / 1 ⁶	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

(6) CT RSR Residential DEC standard for PCBs is 1 ppm. This standard applies to PCBs under CT RSR Regulation 22a-133k-2(b)(2)(B)

* 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 9 February 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 18 March 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.

A settlement agreement under Section 104(e)(6) and 122(h)(1) of the Comprehensive Environmental Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. §§ 9604(e)(6) and 9622(h)(1), for recovery of site-related costs and for access was signed by EPA, City of Middletown and Site owner RLO Properties in May 2012, and became effective on 20 August 2012. Clean up of the Site will proceed as an EPA Fund lead action.

2.1.2 Response Actions to Date

28 August 2009 - EPA and START collected 27 surface (0 to 6 inches below ground surface "bgs") soil samples from 24 locations in the northwestern portion of the Site (Area of Investigation No. 1). The objective of the sampling was to identify and document the surface soil conditions, and the sampling data would be used for public health evaluation by the CT Department of Public Health. The 27 surface soil samples (SS-01 through SS-27) were submitted to the EPA New England Regional Laboratory (NERL) for PCB and metals screening analysis. Samples were screened for PCBs and metals. Confirmation analyses were performed on selected surface soil screening samples.

The results of these surface soil samples detected the following:

- PCBs (Aroclor-1260) at 10 locations with a range of 0.31 ppm to 7.5 ppm, and six locations were above CT DEEP RSR Residential Direct Exposure Criteria (DEC) at 1 ppm.
- Arsenic was detected at two locations above CT RSR I/C standards at 11 ppm and 13 ppm.
- Lead was detected at all locations, but only one location exceeded CT RSR I/C standards at 1,600 ppm.

Based on the above-referenced sampling results, in October 2009, CTDPH issued a public health fact sheet to inform the residents and on-site tenants regarding the contamination found at the Site.

30 November and 4 December 2009 - EPA and START collected 226 surface soil samples from locations throughout the entire Site. All surface soil samples were submitted to the on-site EPA Mobile Laboratory for PCB and metal (XRF) screening analyses. Laboratory confirmatory analyses were performed on selected surface soil screening samples by NERL.

The results of the December 2009 sampling showed the following:

- SVOCs (benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, and bis(2-ethylhexyl)phthalate) at concentrations exceeding CT RSR I/C standards at a total of 79 locations throughout the Site.
- PCBs (Aroclor-1260) were detected at low levels at the majority of locations, and 130 locations were above CT RSR Residential standards at a range from 1 ppm to 270 ppm. Most of these locations were in the southern portion of the current exclusion zone, and in the orange-fenced area of the former investigation derived waste (IDW) drum storage area adjacent to the entrance of American Contractors' garage.
- Arsenic was detected at 14 locations above CT RSR I/C standards at a range of 10 ppm to 62 ppm. Most of these locations were in the central and northern portions of the Site.

In addition to the above surface soil sampling, three samples were sent to NERL for Toxicity Characteristic Leaching Procedure (TCLP) analysis. A second material storage inventory at Area 1 was conducted.

18 March 2010 - OSC Janis Tsang and START members conduct a site visit to photo-document site conditions and inventory the vehicles, debris piles, and other materials on site.

7 July 2010 - START members conduct a site visit to photo-document site conditions and inventory the vehicles, debris piles, and other materials on site.

3 May 2011 - Scott Wing of CTDEEP conducted a site visit and photo-documented the site conditions.

1 June to 29 August 2011 - The owner of the diner hired TANTARA Corporation of Worcester, MA to submit a plan to EPA, CTDPH and CTDEEP to remove the diner from the exclusion zone. The removal of the diner was conducted and completed on 29 August 2011 by TANTARA personnel who were OSHA 40-hour HazWoper trained.

23 February 2012 - Scott Wing of CTDEEP conducted a site visit and photodocumented the Site conditions.

17 and 20 September 2012 - EPA and START collected 205 surface soil samples from locations throughout the entire Site. The objective of the sampling was to identify the general area of the surface soil contamination so that EPA can set up the exclusion zone, contaminated reduction zone, clean and support zone accordingly. All surface soil samples were submitted to the on-site EPA Mobile Laboratory for PCB and metal (XRF) screening analyses. Confirmatory analyses were performed on selected surface soil screening samples by NERL.

The sampling results of the September 2012 sampling indicated the following:

- PCBs (Aroclor-1260) were detected at 66 locations in concentrations above CT RSR Residential standards at

a range from 1 ppm to 35 ppm. Most of these locations were in the southern portion of the current exclusion zone, and in the fence-in drum storage area adjacent to the entrance of American Contractors' garage.

- Arsenic was detected at 13 locations above CT RSR I/C standards at a range of 13 ppm to 136 ppm. Most of these locations were in the central and northern portions of the site.
- Lead was detected at all locations, but only two locations exceeded CT RSR I/C standards at a range of 1,000 ppm to 2,300 ppm. Both of these locations are in the southern portion of the exclusion zone.

In addition, EPA/START photodocumented the site conditions, and conducted an inventory of debris piles, junk cars, and other miscellaneous materials currently staged within Area 1.

17 and 18 September 2012 – The EPA Emergency Rapid Response Service Contractor (ERRS) mobilized to the Site to conduct brush clearing activities near the River Road Site entrance to allow the establishment of Site entry/access, and to clear areas where miscellaneous junk automobiles are located to facilitate a better visual inventory and assessment of the vehicles.

3 and 4 October 2012 – ERRS mobilized to the Site to collect samples from debris piles and IDW drums for disposal analyses.

20 November 2012 – START member Sharp, OSC Allen Jarrell, and ERRS RM Joe Overend meet to inspect the Site, review the September 2012 sampling results, and discuss the next steps for the Removal Action.

26 November 2012 - OSC Allen Jarrell and ERRS mobilized to the Site for the load-out of the thirteen IDW drums to United Oil Recovery Inc. of Meriden, CT for disposal.

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

The Settlement Agreement between EPA, City of Middletown and RLO Properties, Inc. became effective on 20 August 2012. On 23 August 2012, the City of Middletown submitted a \$2.8 million settlement payment to EPA under the terms of the Agreement.

2.1.4 Progress Metrics

Thirteen IDW drums were shipped to United Oil Recovery for off-site disposal 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

- EPA will commence the extent-of-contamination study, including geophysical surveys, when site clearing activities completed.
- EPA will 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.

2.3 Logistics Section

NA

2.4 Finance Section

2.4.1 Narrative

An initial task order of \$300,000 has been issued to the Emergency Rapid Response Service (ERRS) Contractor Environmental Restoration, LLC. A task order modification has been issued for an additional funding of \$500,000 which included \$200,000 from the contingency fund. The current total task order ceiling for ERRS is \$800,000.

The total budgeted Site cost listed below does not include an extramural contingency of \$150,000.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$800,000.00	\$75,000.00	\$725,000.00	90.63%
IAGs	\$250,000.00	\$15,000.00	\$235,000.00	94.00%
TAT/START	\$350,000.00	\$77,000.00	\$273,000.00	78.00%
SERAS	\$200,000.00	\$27,000.00	\$173,000.00	86.50%
Intramural Costs				
Total Site Costs	\$1,600,000.00	\$194,000.00	\$1,406,000.00	87.88%

* 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

EPA OSCs are the Site safety officer and Weston START is the health and safety monitor.

2.6 Liaison Officer

NA

2.7 Information Officer

NA

2.7.1 Public Information Officer

NA

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 Emily Zimmerman, the EPA Community Involvement Coordinator (CIC), to do outreach and/or address any community concerns as they may arise.

3. Participating Entities

3.1 Unified Command

NA

3.2 Cooperating Agencies

CTDEEP

CTDPH

ATSDR

USACE

CTDOT

City of Middletown

4. Personnel On Site

NA

5. Definition of Terms

NA

6. Additional sources of information

6.1 Internet location of additional information/report

NA

6.2 Reporting Schedule

NA

7. Situational Reference Materials

NA

POLREP #2 Last Updated 3/26/2013