United States Environmental Protection Agency
Region I
POLLUTION REPORT

Date: Tuesday, February 19, 2008
From: Athanasios Hatzopoulos

Subject: Factory H
77 Cooper Street, Meriden, CT

POLREP No.:	3	**Site #:**	01EE
Reporting Period:		**D.O. #:**	
Start Date:	9/28/2007	**Response Authority:**	CERCLA
Mob Date:	9/28/2007	**Response Type:**	Time-Critical
Demob Date:		**NPL Status:**	Non NPL
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:		**Contract #**	
RCRIS ID #:			

Site Description

The Factory H Site is located in a mixed residential and commercial zoned area. It is part of the former "International Silver Company" (original site) which is comprised of approximately 7.2 acres. Three buildings currently remain on the foot print of the original site. A fourth building was destroyed by fire in 1980 and subsequently demolished. The three existing buildings consist of Building A, a 76,000 square foot (ft2); Building B, a 900 ft2 two-story transformer/electrical house constructed over Harbor Brook; and Building C, a 3,600 ft2 two-story power plant and boiler house east of Harbor Brook. The former fourth building, Building D, was a series of three buildings in the northeast corner of the Site consisting of a 22,000 ft2 machine shop facility, a 6,000 ft2 foundry facility, and a 1,700 ft2 pattern shop. Other structures currently located on the Site consist of two bridges crossing the Harbor Brook and an inactive water tower.

The Factory H Site is the 76,000 ft2 building (Building A). The building is made up of three connected multi-story buildings. The major portion of the building is a one story saw-tooth style building and has an approximately 5 foot deep sub floor. The other portions of the building are made up of a two story and four story sections. The greater portion of the floors is made of wood. The others are concrete. There are many openings in the floors where the sub floor is exposed, thus making the floors structurally unsafe. These openings are a result of the former machinery being removed by the previous owners. The floor openings have gotten larger through the years because the sections of glass ceiling of the saw-tooth portions of the roof are missing. This allowed many years of precipitation to enter the building, damage the floors and fill the sub-floor areas with water. A portion of the fourth floor of the four story section is structurally unsafe because an area of the floor is missing as well. In addition to the above, most of the glass windows are either missing or broken from vandalism activities.

Currently there is a fence around the building and entrances to the building are locked. However, general public access is unrestricted as evidenced by the presence of burned debris piles within the building in addition to graffiti inside and outside of the building.
According to the EPA Region 1 Environmental Justice Mapping Tool, the Site is in an environmental justice area.

On July 25, 2007, the EPRB and its Technical Assessment and Response Team, Weston Solutions, Inc., conducted a Preliminary Assessment and Site Investigation (PA/SI). The PA/SI included sampling floor debris and pipe insulation material that had fallen on the floors for asbestos content. In addition, the debris on the floors was sampled for heavy metal content (lead). Thirty nine samples were collected in total. From those samples, twenty one were analyzed for asbestos and 18 were analyzed for lead content. The chemical analysis for the asbestos revealed that all but two samples contain amosite and chrysotile asbestos with the highest concentration of 45% chrysotile. All of the samples analyzed for lead, revealed lead levels ranging from 450 mg/Kg to 6,600 mg/Kg.

The PA/SI was concluded and based on Site conditions and preliminary analytical results, a time critical removal action was recommended in a closure memorandum dated August 27, 2007. The request for a Removal Action Memorandum was signed by the EPA Region 1 OSRR Director on September 25, 2007.

Current Activities

From January 14, 2008 through January 25, 2008:
Fleet establishes containment barriers and negative air machines throughout the northern sections of the first floor. Fleet conducts the wrapping and load-out of ACM debris from these areas. START photodocuments work progress. Once all ACM debris is removed from the northern areas of the first floor, all floors are power-washed to remove loose asbestos that has fallen from overhead pipes. A total of 28 30-cu. yd. roll-offs containing ACM are sent to Modern Landfill in York, Pennsylvania for off-site disposal, and bags of bulk asbestos continue to be staged on site.

On January 23, 2008, a meeting is held by the US EPA to discuss the ongoing work being conducted and the future plans for the site. The meeting is attended by representatives of the City of Meriden, Connecticut Department of Environmental Protection, and Connecticut Department of Public Health.

Perimeter and personnel air monitoring continues to be conducted. Analytical results of all perimeter air samples collected to date indicate that fiber concentrations in the surrounding community are well below site action levels. Analysis of personal air samples determines that no worker exposure to fiber levels near or above applicable OSHA standards has occurred.

Security personnel continue to monitor the site during non-working hours.

From January 28, 2008 through February 1, 2008:
Fleet completes removal of asbestos pipe wrap from the three rooms in the northern section of the first floor and HEPA vacuums the floors. START photodocuments work progress, and a visual inspection is conducted by EPA of the abated work areas to confirm that no visual residue remains. Fleet begins to wrap remainder of ACM debris in the southern (Factory H) section of the first floor.

One 30-cu. yd. roll-off containing ACM is sent to Modern Landfill in York, Pennsylvania for off-site disposal. One 100-cu. yard box trailer, containing approximately 3,700 35-gallon bags of bulk asbestos, is sent to BFI Imperial Landfill in Imperial, Pennsylvania.

Perimeter and personnel air monitoring continues to be conducted. Analytical results of all perimeter air samples collected to date indicate that fiber concentrations in the surrounding community are well below site action levels. Analysis of personal air samples determines that no worker exposure to fiber levels near or above applicable OSHA standards has occurred.

Security personnel continue to monitor the site during non-working hours.

On January 31, 2008, the Director for the Office of Site Remediation and Restoration signs an action memorandum addendum for the Factory H Site. The action memorandum addendum changes the scope of response and increases the total removal ceiling for the project. The change in scope of response addresses the friable asbestos discovered in subgrade utility passageways. The total removal ceiling for the Factory H Site is increased from $770,000 to $1,320,000.

February 4, 2008 through February 15, 2008

Fleet completes the wrapping and disposal of ACM debris in Factory H. This debris includes loose floor boards from the top layer of the floor, which has deteriorated and warped over time due to being exposed to the elements. In addition, Fleet completes asbestos removal in the two-story section located off of the western side of Factory H. Thirty-five 30-cu. yd. roll-off containing ACM is sent to Modern Landfill in York, Pennsylvania for off-site disposal.

Heavy rains on February 13th cause the site and surrounding streets to flood, due to spill-over from Harbor Brook. No equipment is damaged and site conditions return to normal by the following day.

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Security personnel continue to monitor the site during non-working hours.

Planned Removal Actions

Complete removal of ACM contaminated debris from the first floor of the Factory H building and the subgrade utility passageways.

Upon completion of asbestos removal and transportation and disposal (T&D) activities, personnel and equipment will be demobilized from the site.

response.epa.gov/FactoryH