

FACTORY H SITE
(Site Identification Code – 01EE)

**REMOVAL ACTION
ADMINISTRATIVE RECORD FILE
AND**

INDEX

Prepared For:

U.S. Environmental Protection Agency
Region I
Emergency Planning and Response Branch
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

CONTRACT NO. EP-W-05-042

TDD NO. 01-08-04-0011

TASK NO. 0403

DC NO. R-4879

Prepared by:

Weston Solutions, Inc.
Region I
Superfund Technical Assessment and Response Team
3 Riverside Drive
Andover, Massachusetts 01810

Revised April 2008

INTRODUCTION

This document is the Index to the Administrative Record File for the Factory H Site Removal Action. The Index cites site-specific documents and guidance documents used by U.S. Environmental Protection Agency (EPA) staff in selecting a removal action at the site. Activities conducted under the Fund-lead removal action will protect public health, welfare, and the environment, and include the following:

- 1.) Conducting a site walk with the Emergency Rapid Response Services (ERRS) contractor.
- 2.) Securing the site to prevent unauthorized access.
- 3.) Evaluating the structural integrity of the floors to determine their stability and potential for collapse.
- 4.) Stabilizing the floor areas that are structurally unsafe to enable contractor personnel to conduct the removal action; and if necessary, dismantling the unstable floors to permit access to asbestos, and asbestos-containing material (ACM)/lead-commingled debris.
- 5.) Conducting the removal and disposal of asbestos, ACM, and ACM/lead-commingled debris.
- 6.) Documenting asbestos material and asbestos/lead-contaminated waste and shipping it off site for disposal at EPA-approved facilities.

All wastes will be staged in a secure area on site while awaiting shipment to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)-compliant off-site disposal facilities. Depending on anticipated storage duration prior to shipment for ultimate disposal, the On-Scene Coordinator (OSC) will determine whether waste will be staged on site or shipped to a properly permitted temporary storage facility. Waste staging options will be evaluated based on cost.

Where practical, the final disposal of waste from the site will utilize an alternative technology to landfilling. The specific treatment and disposal technology will depend on factors such as quantity and hazardous characteristics, as well as the availability of alternate technologies.

The Administrative Record File is available for public review, by appointment, at the U.S. EPA Records Center, One Congress Street, Suite 1100, Boston, Massachusetts, 02114-2023; and at the Meriden Public Library, 105 Miller Street, Meriden, Connecticut, 06450. Questions concerning the Administrative Record File should be addressed to Athanasios Hatzopoulos, EPA On-Scene Coordinator.

The Administrative Record File is required by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9613 (k), and EPA's implementing regulations, 40 CFR § 300.800.-825.

PLEASE NOTE: THE FOLLOWING DOCUMENTS COMPILED IN THIS ADMINISTRATIVE RECORD FILE HAVE BEEN MADE FROM THE BEST AVAILABLE COPIES.

SITE-SPECIFIC DOCUMENTS

ADMINISTRATIVE RECORD FILE INDEX for the Factory H Site Removal Action

REMOVAL

Correspondence (Site File 2.01)

1. Letter from Larry Kendzior, City Manager, and Mark D. Benigni, Mayor, City of Meriden, Connecticut, 124 East Main Street, City Hall, Meriden, CT 06450, to Mr. Robert Varney, Regional Administrator, EPA Region I, Boston, MA, 02114, regarding the Factory H site and requesting that EPA conduct a removal action at the site, dated 13 July 2007.
2. Letter from Mark DeCaprio, MPH, RS, Director, Emergency Response and Spill Prevention, Bureau of Materials Management and Compliance Assurance, Connecticut Department of Environmental Protection, to Mr. Steve Novick, Section Chief, Emergency Response and Removal 1 Section, EPA Region I, regarding Insilco Building, 77 Cooper Street, Meriden, Connecticut, dated 10 August 2007.
3. Memorandum from Athanasios Hatzopoulos, On-Scene Coordinator, Emergency Response and Removal Section II, Emergency Planning and Response Branch (EPRB), Office of Site Remediation and Restoration (OSRR), EPA Region I, through Steven Novick, Chief, Emergency Response and Removal Section II, EPRB, OSRR, EPA Region I, to the Factory H Site File, regarding the Site Investigation Closure at the Factory H Site, Meriden, CT, dated 27 August 2007.

Removal Reports (Site File 2.02)

4. "Removal Program Preliminary Assessment/Site Investigation Report for the Factory H Site, Meriden, New Haven County, Connecticut, 25 July 2007", prepared by Weston Solutions, Inc, Superfund Technical Assessment and Response Team (START), for U.S. Environmental Protection Agency (EPA) Region I, dated November 2007.

Action Memorandum (Site File 2.09)

5. Memorandum from Athanasios Hatzopoulos, On-Scene Coordinator, Emergency Response and Removal Section II, EPA Region I, through Steven R. Novick, Chief, Emergency Response and Removal Section II, EPA Region I, and Arthur V. Johnson III, Branch Chief, Emergency Planning & Response Branch, EPA Region I, to James T. Owens III, Director, Office of Site Remediation and Restoration, EPA Region I, regarding a Request for a Removal Action at the Factory H Site, Meriden, Connecticut, dated 28 August 2007, and signed by Richard Cavagnero for James T. Owens on 25 September 2007. (The Enforcement Section of the Memorandum is withheld as being CONFIDENTIAL.)

6. Memorandum from Athanasios Hatzopoulos, On-Scene Coordinator, Emergency Response and Removal Section II, EPA Region I, through Steven R. Novick, Chief, Emergency Response and Removal Section II, EPA Region I, and Arthur V. Johnson III, Branch Chief, Emergency Planning & Response Branch, EPA Region I, to James T. Owens III, Director, Office of Site Remediation and Restoration, EPA Region I, regarding a Request of Ceiling Increase of Funds to Continue the Removal Action and Expand the Scope of Response at the Factory H Site, Meriden, Connecticut, dated 22 January 2008, and signed on 31 January 2008. (The Enforcement Section of the Memorandum is withheld as being CONFIDENTIAL.)

COMMUNITY RELATIONS

News Clippings/Press Releases (Site File 13.03)

7. EPA Press Release, "Clean up Begins at "Factory H" Site in Meriden, Conn.", dated 6 November 2007.
8. "Administrative Record File Available for the Factory H Site Removal Action," text of the display announcement as it was requested to appear in the *Record-Journal*, Meriden, Connecticut.

Please see the following website for more information regarding this site:
<http://www.epaosc.net/FactoryH> .

SELECTED KEY GUIDANCE DOCUMENTS

EPA guidance documents may be reviewed at the EPA Superfund Records Room, 1 Congress Street, Suite 1100, Boston, Massachusetts.

1. Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. § 9601 et seq.
2. "National Oil and Hazardous Substances Pollution Contingency Plan," Code of Federal Regulations (Title 40, Part 300) 1990.
3. "Action Memorandum Guidance", Superfund Removal Procedures, U.S. EPA, Office of Emergency and Remedial Response, OSWER Directive 9360.3-01, September 1990.
4. Superfund Amendments and Reauthorization Act of 1986.



MARK BENIGNI
MAYOR

City of Meriden, Connecticut

OFFICE OF THE MAYOR

142 East Main Street, City Hall • Meriden, CT 06450
TELEPHONE (203) 630-4125 • FAX (203) 639-7008
E-Mail: mbenigni@ci.meriden.ct.us

July 13, 2007

Mr. Robert Varney
Regional Administrator
USEPA Region 1
1 Congress Street, Suite 1100 (RAA)
Boston, MA 02114-2023

Dear Mr. Varney:

On Thursday, July 12, Tom Hatzopoulos and Wing Chau, EPA Region 1 On-Scene Coordinators and City of Meriden representatives visited 77 Cooper Street (Factory H) to inspect conditions in the abandoned factory building on site and evaluate the potential need for an EPA removal action. The following primary concerns were identified by EPA staff:

- **widespread airborne, friable asbestos and peeling lead paint throughout the building;**
- **high potential for a fire to be set due to the presence of excessive wooden debris;**
- **proximity of Factory H to a high-density neighborhood and Harbor Brook;**
- **evidence of trespassers despite the building being locked and windows boarded.**

The primary concern is that a fire caused by natural causes or trespassers could cause a catastrophic release of asbestos into the adjoining neighborhood. The neighborhood is home to sensitive populations including children and elderly.

The vacant factory at 77 Cooper Street was a former home of the International Silver Company. It is located in the middle of a residential area, surrounded by one to three family homes to the east, elderly apartment complexes to the north as well as homes and commercial establishments to the west and south. The site is bifurcated by Harbor Brook. The City recently condemned and took title to the property.

Through EPA Brownfields program, the City has engaged the surrounding community in an environmental education effort and conducted a reuse planning charrette for the site. The City has an active Brownfields Committee composed of businesses, residents, city staff and neighborhood stakeholders who oversee the clean up and redevelopment of this site. Members of our Brownfields Committee are also extremely concerned by the on-site hazards.

The hazards and blighted structures at 77 Cooper Street are also major impediments to the revitalization of the surrounding Dutch Hill and Action 13 neighborhoods and impede

Mr. Robert Varney
July 13, 2007
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flood control infrastructure work needed in the City. The City recently received a \$200,000 EPA cleanup grant in order to begin remediation efforts. However, the demolition of the Factory H building and hazards removal are critical to moving these efforts forward.

We therefore request that EPA conduct a removal action due to the concerns listed above. It should be noted that both of EPA's On-Scene Coordinators noted that if a fire were to occur in the building, the response effort would be significant because of the proximity of the brook and neighboring homes.

We hope that EPA will again partner with the City to return this site to active reuse, prevent future flooding and significantly improve the quality of life of our residents.

Sincerely,



Larry Kendzior
City Manager



Mark D. Benigni
Mayor, City of Meriden

C: Wing H. Chau, On-scene Coordinator, EPA
Athansios Hatzopoulos, On-scene Coordinator, EPA
Peggy Brennan, Economic Development Director
Philip T. Ashton, Chairman, Flood Control Implementation Agency



**STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION**



August 10, 2007

Mr. Steve Novick, Section Chief
Emergency Response and Removal 1 Section
US EPA Region I
1 Congress Street, Suite 1100
Boston, Mass. 02114-2023

Re: Insilco Building 77 Cooper Street, Meriden, Connecticut

Dear Mr. Novick:

I understand from Mr. Thigpen, who is one of my staff that environmental samples by EPA / Weston Solutions have been confirmed to contain friable asbestos. Due to the nature of this site and magnitude of the cleanup involved, I am requesting that EPA reserve funding for containment and removal of asbestos containing materials (ACM) from the above referenced location. Presently the Department does not have funding for this activity at this time. Please contact Richard Ciasullo, North Region Supervisor or myself if you have questions regarding this request. Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Mark DeCaprio".

Mark DeCaprio, MPH, RS
Director
Emergency Response and Spill Prevention
Bureau of Materials Management and Compliance Assurance

Cc: Richard Ciasullo
Donnell Thigpen



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

DATE: August 27, 2007

SUBJ: Site Investigation Closure Memorandum
Factory H Site
Meriden, CT

FROM: Athanasios Hatzopoulos, On-Scene Coordinator
Emergency Response and Removal Section II, EPRB, OSRR

THRU: Steven Novick, Chief
Emergency Response and Removal Section II, EPRB, OSRR

TO: Factory H Site File

In accordance with section 300.410 of the National Contingency Plan (NCP), a Removal Site Evaluation, consisting of a Preliminary Assessment and Site Investigation (PA/SI), has been undertaken at the Factory H Site ("Site") in Meriden, CT. The findings of the Removal Site Evaluation have been evaluated under the criteria set forth in section 300.415 of the NCP, section 104(a) and (b) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(a) and (b) and Clean Water Act (CWA) § 311(c)(i) as amended by the Oil Pollution Act (OPA) § 4201(a). The Removal Site Evaluation has led to the determination that a Removal Action is appropriate at this time.

The findings of the Removal Site Evaluation are outlined below.

1. Source and nature of the release or threat of release
 - a. The Removal Site Evaluation consisted of the following actions.
 - i. Review of the analytical results on samples collected on July 25, 2007 by Weston Solutions, Inc. Superfund technical Assessment and Response Team 2000 (START).
 - b. Based on the information available at this time, the principal hazardous substances or pollutants or contaminants that are being released or for which there is threat of release include but are not necessarily limited to the list below.

<u>Hazardous Substances or Pollutants</u>	<u>Media</u>
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Friable asbestos	Pipe insulation
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2. Evaluation of the threat to public health, welfare and the environment

a. Federal Agency for Toxic Substances and Disease Registry:

Threat _____ No Threat _____ Evaluation Not Necessary x _____

b. Endangerment to the ecosystem:

Threat _____ No Threat _____ Evaluation Not Necessary x _____

3. The Removal Site Evaluation was terminated pursuant to section 300.410(f) of the NCP for the following reason.

- There is no release.
- The source is neither a "vessel" nor a "facility" as defined in section 300.5 of the NCP.
- The release involves neither a hazardous substance, nor a pollutant or contaminant that may present an imminent and substantial danger to public health or welfare of the United States.
- It is subject to the limitations on response specified in §300.400(b)(1) through (3). The release is
 - of a naturally occurring substance in its unaltered form, or altered solely through naturally occurring processes or phenomena, from a location where it is naturally found.
 - from products that are part of the structure of, and result in exposure within, residential buildings or businesses or community structures.
 - into public or private drinking water supplies due to deterioration of the system through ordinary use.
- The amount, quantity, or concentration released does not warrant a Federal response.
- A party responsible for the release, or any other person, is providing appropriate response, and on-scene monitoring by EPA is not required.
- The Removal Site Evaluation is complete.

4. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its completion, and not for other reasons.

a. The factors listed below, found in Section 300.415(b)(2) of the NCP, are applicable to this Site.

- (x) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.
- (x) Actual or potential contamination of drinking water supplies or sensitive ecosystems.
- () Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.
- () High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate.
- (x) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
- (x) Threat of fire or explosion.
- (x) The availability of other appropriate Federal or State response mechanisms to respond to the release.
- () Other situations or factors that may pose threats to public health or welfare of the United States or the environment.

b. The existence of the conditions specified in Section 4.a., above, indicate that a Removal Action under section 300.415 of the NCP is necessary. On July 25, 2007, EPA conducted a preliminary assessment and site investigation (PA/SI) and collected samples from the floors of the abandoned buildings. The PA/SI documented the presence of friable asbestos and paint chips containing lead. Parts of the roof, in addition to windows of the buildings are missing. These conditions pose a direct contact threat via inhalation to the local residents. In addition, the buildings are abandoned and lack functioning fire suppression equipment, in case of a fire, the above mentioned hazardous substance will become airborne and migrate to the surrounding areas.

c. In light of the magnitude of the threat or potential threat to health, welfare, or the environment, the appropriate categorization of a Removal Action at this Site is:

Emergency___ Time-Critical__x___ Non Time-Critical___

5. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its completion, and not for other reasons.

a. As found in section 300.410(e)(1) of the NCP, the OSC shall determine whether a release governed by CWA section 311(c)(1), as amended by OPA section 4201(a), has occurred.

() There is a release, or potential threat of release, as governed by the CWA as amended by OPA.

(x) There is not a release, or potential threat of release, as governed by the CWA as amended by OPA.

b. The absence of the conditions specified in Section 5.a., above, indicate that an Oil Spill Response under Appendix E to Part 300 of the NCP **is not** necessary.

cc: David McIntyre, Chief, Emergency Response and Removal Section I, OSRR (w/o attachments)
Meghan Cassidy, Chief, Technical Support & Site Assessment Section, OSRR (w/o attachments)
Cheryl O'Halloran, EPRB, OSRR (w/o attachments)

**REMOVAL PROGRAM
PRELIMINARY ASSESSMENT/
SITE INVESTIGATION REPORT
FOR THE
FACTORY H SITE
MERIDEN, NEW HAVEN COUNTY, CONNECTICUT
25 JULY 2007**

Prepared For:

U.S. Environmental Protection Agency
Region I
Emergency Planning and Response Branch
1 Congress Street, Suite 1100
Boston, MA 02114-2023

CONTRACT NO. EP-W-05-042

TDD NO. 07-06-0010

TASK NO. 0313

DC NO. R-4887

Submitted By:

Weston Solutions, Inc.
Region I
Superfund Technical Assessment and Response Team III (START)
3 Riverside Drive
Andover, MA 01810

November 2007

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I. Preliminary Assessment/Site Investigation Forms

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REMOVAL PRELIMINARY ASSESSMENT

Source of Information (Concluded)

(√) Reports:

Background Summary Memorandum for International Silver Co., Factory H, Meriden, Connecticut, prepared by Roy F. Weston, Inc. (now known as Weston Solutions, Inc.), Superfund Technical Assessment and Response Team (START), for EPA Region I, dated September 1997.

Preliminary Assessment/Site Investigation Report for Former International Silver Company, Meriden, New Haven County, Connecticut, prepared by Roy F. Weston, Inc. (now known as Weston Solutions, Inc.), START, for EPA Region I, dated January 1998.

() Other:

Potential Responsible Parties

Owner: International Silver Company (inactive)

Telephone:

Site Access

Authorizing Person: Lawrence Kendzior, City Manager, City of Meriden, CT

Date: 19 July 2007

Obtained

Verbal

Telephone: (203) 630-4151

Not Obtained

Written

Historical Preservation

() Site is Historically Significant or Eligible for Historic Preservation

Contacts Identified

1) State Historical Preservation Officer (SHPO)

Name: Ms. Karen Senich

Telephone: (860) 566-3005

2) Tribal Historical Preservation Officer (THPO)

Name:

Telephone:()

Comments: The site is not listed on city or state registrars as historically significant.

Physical Site Characterization

Background Information: The Factory H site is part of a 7.2-acre property, known as the former International Silver Company (Co.) property, which is located in a mixed residential- and commercial-zoned area of downtown Meriden. The former International Silver Co. property is bordered by a restaurant to the north; apartment complexes to the northeast; railroad tracks and residences to the east; Cooper Street to the south; and a medical center and residences to the west. The former International Silver Co. property is currently owned by the City of Meriden and includes three buildings: Building A, Building B, and Building C.

REMOVAL PRELIMINARY ASSESSMENT

Physical Site Characterization (Continued)

The Factory H site encompasses Building A, which is discussed in detail below. Building B is a 900-square-foot (ft²), two-story transformer/electrical house that was constructed in the 1940s. Building C is a 3,600-ft², two-story power plant and boiler house that was also constructed during the 1940s. A fourth building, Building D, was constructed in approximately 1854, and was destroyed by a fire in 1980 and subsequently demolished.

Building A is a 76,000-ft², brick building that was constructed in two phases: the first phase circa 1866 and the second phase circa 1947. Building A is comprised of three connected sections: a one-story saw-tooth-style section (Factory H); a small two-story section along the western side of the building; and a four-story section along the northern portion of the building. The second story of the four-story section extends over part of Factory H. Harbor Brook flows north to south along the eastern portion of the Factory H site.

Beginning in 1891, the International Silver Co. property consisted of two parcels located to the west and east of Harbor Brook, and operated respectively by C. Rogers and Brothers (Bros.) Silverware (later known as U.S. Silver) and Parker Bros. Gun Works. International Silver Co. acquired U.S. Silver at an unknown date and purchased the Parker Bros. Gun Works property during the 1930s. International Silver Co. combined the two parcels and operated the facility known as Factory H for the production of flatware and cutlery until operations ceased in approximately 1974. The International Silver Co. property has remained unoccupied since that time.

In approximately 1985, the International Silver Co. property was acquired by MidState Medical Center, who approached Connecticut Department of Environmental Protection (CT DEP) subsequent to their discovery of widespread contamination on the property. The property was then sold to BL&A Associates (BL&A) at an unknown time.

In June 1988, HRP Associates, Inc. (HRP) completed a Site Assessment (SA) Report for the International Silver Co. property on behalf of BL&A. HRP identified 11 underground storage tanks (USTs); five aboveground storage tanks (ASTs); suspected asbestos-containing material (ACM); visibly stained soils; unidentified debris piles; dust piles generated from the facility's dust collectors; miscellaneous sumps, floor drains, catchbasins, and a dry well; suspected lead paint; and stained interior building surfaces. Analytical results of soil samples collected from 13 soil borings advanced by HRP in the northeastern corner of the property indicated an area of contaminated soil containing trichloroethylene (TCE) at a concentration of 873 parts per billion (ppb) and tetrachloroethylene (PCE) at a concentration of 924 ppb, as well as the presence of xylene (153 ppb), toluene (392 ppb), chromium [0.23 parts per million (ppm)], copper (15 ppm), and nickel (4.2 ppm). Additional analytical results indicated the presence of TCE (69 ppb), PCE (33 ppb), trans-1,2-dichloroethylene (trans-1,2-DCE) (20 ppb), and methylene chloride (2 ppb) in groundwater samples; the presence of TCE (10 ppb) in surface water samples collected from Harbor Brook; and the presence of copper (65 ppm), nickel (46 ppm), and silver (0.06 ppm) in samples collected from dust piles.

REMOVAL PRELIMINARY ASSESSMENT

Physical Site Characterization (Continued)

On 24 January 1990, Advanced Environmental Interface, Inc. (AEI) completed a report entitled *Assessment of Site Environmental Conditions*, documenting the contents of four 55-gallon drums, the presence of friable asbestos in pipe insulation, and the presence of non-friable asbestos in floor tiles, roof shingles, and AST insulation located outside the on-site buildings.

On 17 December 1990, ICF Kaiser Engineers, Inc. (ICF) completed a report entitled *Underground Storage Tank Sampling*, documenting the presence of petroleum products in four of 11 on-site USTs. All product contained in these four USTs was subsequently removed by ICF and/or their contractors.

In 1992, a Civil Action was brought against International Silver Co. [the Potentially Responsible Party (PRP)] by CT DEP, resulting in the establishment of an escrow account to be used for addressing environmental conditions at the International Silver Co. property under the direction of CT DEP.

On 9 January 1998, Roy F. Weston, Inc. (now known as Weston Solutions, Inc.) START completed a Removal Program Preliminary Assessment/Site Investigation (PA/SI) report on behalf of the EPA Emergency Planning and Response Branch (EPRB) and EPA Brownfields Program. Analytical results of surface soil/dust samples collected during the PA/SI indicated the presence of acetone (380 ppb), cyanide (41 ppm), and Aroclor 1260 (0.22 ppm). Analytical results of liquid samples collected from tanks and drums indicated the presence of acetone (250 ppb), toluene (330 ppb), ethylbenzene (570 ppb), total xylene (4,600 ppb), bis(2-ethylhexyl)-phthalate (150 ppb), naphthalene (1,400 ppb), benzoic acid (1,900 ppb), and 2-methylnaphthalene (600 ppb). In addition, analytical results confirmed the presence of asbestos in Buildings A and C. Based on the results of the PA/SI, EPA determined that a removal action was warranted at the International Silver Co. property. However, EPA did not commit federal funding to address the property at this time due to an excess of \$1,000,000 being available to CT DEP from the account established by the PRP in 1992.

In September 1999, EPA completed a Brownfields Targeted Site Assessment Final Report.

In June 2000, GZA GeoEnvironmental, Inc. conducted additional investigations on the former International Silver Co. property, including a Supplemental Phase II Environmental Site Evaluation.

In 2004 CT DEP oversaw various removal and stabilization activities conducted at the former International Silver Co. property by AEI and their contractor, Fleet Environmental (Fleet), and funded by the escrow account established by the PRP. Activities conducted by Fleet included the removal of the following potential sources of contamination: all ACM that had fallen or appeared at risk of falling inside Building C, Building B, and sections of Building A; all ACM present on the grounds surrounding the on-site buildings; contents of remaining ASTs and USTs, including a 10,000-gallon wastewater UST; and 1,400 tons of soil. Soil was excavated to a depth of 2 feet from the area beneath the dust collectors that are located between Building A and Harbor Brook.

REMOVAL PRELIMINARY ASSESSMENT

Physical Site Characterization (Concluded)

In 2004, CT DEP exhausted the escrow account available to address environmental conditions at the former International Silver Co. property. As funds were insufficient to remediate the property in its entirety, the property was referred to EPA to identify remaining issues and determine if conditions warranted further removal actions.

On 12 July 2007, EPA OSCs Athanasios Hatzopoulos and Wing Chau conducted a reconnaissance at the Factory H site to document site conditions. The Factory H site consists of Building A (including the one-story Factory H section and the four-story section) and its immediately surrounding area, encompassing those areas not addressed by prior remediation actions. The following concerns were observed during the on-site reconnaissance: possible asbestos and lead contamination; openings in the floor of Factory H where the sub-floor is exposed; evidence of trespassers (*i.e.*, burned debris piles, broken glass windows, and graffiti); and a potential for fire due to excessive wood debris and a lack of fire protection throughout the building. In addition, private residences were observed within approximately 50 feet of the Factory H site.

On 13 July 2007, the City of Meriden formally requested that EPA conduct a removal action due to the concerns listed above.

Description of Substances Possibly Present, Known or Alleged: There is a potential for asbestos contamination based on previous investigations and asbestos removal actions conducted throughout on-site buildings. There is a potential for lead contamination due to building history and observations made during the 12 July 2007 on-site reconnaissance.

Existing Analytical Data

Real-Time Monitoring Data:

Sampling Data (available in the following reports):

Site Assessment Report, prepared by HRP Associates, Inc., 21 June 1988.

Assessment of Site Environmental Conditions Report, prepared by Advanced Environmental Interface, Inc., 24 January 1990.

Underground Storage Tank Sampling Report, prepared by ICF Kaiser Engineers, Inc., 17 December 1990.

Removal Program Preliminary Assessment/Site Investigation Report for the Former International Silver Company Site, Meriden, Connecticut, prepared by Roy F. Weston, Inc. Region I Superfund Technical Assessment and Response Team, 22 December 1997.

REMOVAL PRELIMINARY ASSESSMENT

Existing Analytical Data (Concluded)

Supplemental Phase II, Environmental Site Evaluation Report, International Silver Company, Factory H Site, Meriden, Connecticut, prepared by GZA GeoEnvironmental, Inc., July 2005.

Removal Stabilization Activities Summary Report, Former International Silver Company/Insilco Factory H Site, Meriden, CT, prepared by Advanced Environmental Interface, Inc., February 2006.

Potential Threat

Description of potential hazards to environment and/or population-identify any of the criteria for a Removal Action (from NCP) that may be met by the site under 40 CFR 300.415 [b] [2].

- i. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants.
- ii. Actual or potential contamination of drinking water supplies or sensitive ecosystems.
- iii. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.
- iv. High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate.
- v. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
- vi. Threat of fire or explosion.
- vii. The availability of other appropriate federal or state response mechanisms to respond to the release.
- viii. Other situations or factors that may pose threats to public health or welfare or the environment.

REMOVAL PRELIMINARY ASSESSMENT

Prior Response Activities

PRP STATE FEDERAL OTHER

Brief Description: HRP, AEI, and ICF conducted sampling and removal activities on the former International Silver Co. property between 1988 and 1990. Roy F. Weston Inc., Region I START completed sampling activities on behalf of EPA in 1998. CT DEP oversaw removal and stabilization activities conducted by AEI in 2004.

Priority for Site Investigation

High Medium Low None

Comments: There is a high priority for site investigation due to unrestricted access to facility and potential of hazardous substances to impact surrounding populations via migration through openings in roof and windows, particularly during adverse weather conditions or in the case of fire.

Report Generation

Originator: Carolyn Imbres
Affiliation: Weston Solutions, Inc. (START)
TDD No.: 07-06-0010

Date: 2 October 2007
Telephone: (978) 552-2105
Task No.: 0313

RECAPITULATION OF THE FACTS

Very Respectfully,
[Signature]

BY: [Signature] (Name)

The undersigned, [Name], [Address], [City], [State], [Zip], and [Phone Number], hereby certifies that the foregoing is a true and correct copy of the [Document Name] as the same appears in the records of the [Organization Name], [Address], [City], [State], [Zip].

This page has been intentionally left blank.

Witness my hand and seal this [Day] day of [Month], [Year].

[Signature]

[Signature] (Name)
[Address]
[City], [State], [Zip]

REMOVAL SITE INVESTIGATION

Agencies/Personnel Performing Inspection (Concluded)

Other:

Current Owner Based on Field Interview: City of Meriden, CT

Physical Site Characteristics

Parameter	Quantities/Extent
<input type="checkbox"/> Cylinders:	
<input checked="" type="checkbox"/> Drums:	One empty, unmarked 55-gallon steel drum was observed along the western interior wall of Factory H.
<input type="checkbox"/> Lagoons:	
<input type="checkbox"/> Tanks: <input type="checkbox"/> Above:	
<input type="checkbox"/> Below:	
<input checked="" type="checkbox"/> Asbestos:	Samples of suspected asbestos-containing material (ACM) were collected from piping, and the floor directly beneath piping, located throughout the building. Additional samples were collected from suspected ACM shingles and floor tiles.
<input checked="" type="checkbox"/> Piles:	Piles containing building debris, furniture, dust, and paint chips were found throughout the building, with large debris piles concentrated in the northern section of Factory H.
<input type="checkbox"/> Stained Soil:	
<input type="checkbox"/> Sheens:	
<input type="checkbox"/> Stressed Vegetation:	
<input type="checkbox"/> Landfill:	
<input checked="" type="checkbox"/> Population in Vicinity:	There are gaps in the fence surrounding the site, as well as broken windows, an open roof in Factory H, and signs of recent activity in Factory H (graffiti and appearance of makeshift skateboard ramp) which suggest use of the facility by the nearby population. The site is located adjacent to multiple apartment complexes and residences and is located in a heavily populated residential and commercial area of downtown Meriden.
<input type="checkbox"/> Wells: <input type="checkbox"/> Drinking:	
<input type="checkbox"/> Monitoring:	
<input checked="" type="checkbox"/> Other:	Paint was observed to be peeling from the walls and was observed in floor debris throughout the building. Due to the date of building construction, the paint was suspected to contain lead.

REMOVAL SITE INVESTIGATION

Physical Site Observations

The on-site building includes the one-story Factory H section and a four-story section. The floor of Factory H has collapsed in several places, exposing an approximately 5-foot-deep sub-floor and resulting in many structurally unsafe areas. Approximately 20% of the floor of Factory H was inaccessible due to large piles of building debris and other refuse. Sections of the glass ceiling in Factory H were missing, and the majority of the windows throughout the building were broken or sealed with boards. Although there is a fence surrounding the property and entrances to the building are locked, evidence of trespassing was found, including the presence of graffiti on both the interior and exterior of the building. Suspected ACM in pipe insulation, shingles, and floor tiles, and potential lead paint were found throughout the building, excluding a room on the second floor of the four-story section in which asbestos removal was previously conducted. The fourth floor of the four-story section was not accessible due a partially collapsed floor. Harbor Brook flows north to south through the site, to the east of the building. The site is bordered by a restaurant to the north; apartment complexes to the northeast; railroad tracks and residences to the east; Cooper Street to the south; and a medical center and residences to the west.

Field Sampling and Analysis

Matrix/Analytical Parameter	Field Instrumentation				
	CGI/O ₂	RAD	PID	FID	Other
Background Readings:	0.0/20.9%				
Air:	0.0/20.9%				
Soil:					
Surface:					
Water:					
Tanks:					
Drums:					
Vats:					
Lagoons:					
Spillage:					
Run Off:					
Piles:					
Sediments:					
Groundwater:					
Other:					

REMOVAL SITE INVESTIGATION

Field Quality Control Procedures

SOP Followed

Deviation From SOP

Comments: START followed the protocol outlined in the document entitled, *Sampling and Analysis Plan for the INSILCO Factory H Property, Meriden, New Haven County, Connecticut*, with the following revisions: no surface soil or water samples were collected, and no samples were analyzed for polychlorinated biphenyls (PCBs) or semivolatile organic compounds (SVOCs).

Description of Sampling Conducted

On 25 July 2007, START collected a total of 18 debris samples, including one duplicate, from 17 locations throughout the on-site building for lead analysis. START collected 21 samples, including one duplicate, from suspected ACM pipe insulation, shingles, and floor tiles, from locations throughout the building for asbestos analysis. All samples were delivered to the EPA Office of Environmental Measurement and Evaluation (OEME) laboratory located in North Chelmsford, Massachusetts for analysis. Debris samples were analyzed for lead by X-Ray Fluorescence (XRF); and 20% of debris samples (four samples) were analyzed for lead via the Inductively Coupled Plasma (ICP) method.

Analyses

Analytical Parameter	Media	Laboratory
<input type="checkbox"/> VOC	<input type="checkbox"/> AIR	<input checked="" type="checkbox"/> OEME
<input type="checkbox"/> PCB	<input type="checkbox"/> WATER	<input type="checkbox"/> CLP
<input type="checkbox"/> PESTICIDE	<input checked="" type="checkbox"/> SOIL/DEBRIS	<input type="checkbox"/> PRIVATE
<input checked="" type="checkbox"/> METALS	<input checked="" type="checkbox"/> SOURCE	<input type="checkbox"/> SAS
<input type="checkbox"/> CYANIDE	<input type="checkbox"/> SEDIMENT	<input type="checkbox"/> SOW
<input type="checkbox"/> SVOC	<input type="checkbox"/> WIPE	<input type="checkbox"/> FIELD
<input type="checkbox"/> TOXICITY		
<input type="checkbox"/> DIOXIN		
<input checked="" type="checkbox"/> ASBESTOS		
<input type="checkbox"/> OTHER		

Analytical Results: See Appendix B – Tables

REMOVAL SITE INVESTIGATION

Site Determination (Concluded)

- v. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
- vi. Threat of fire or explosion.
- vii. The availability of other appropriate federal or state response mechanisms to respond the release.
- viii. Other situations or factors that may pose threats to public health or welfare or the environment.

Report Generation

Originator: Carolyn Imbres
Affiliation: Weston Solutions, Inc. (START)
TDD No.: 07-06-0010

Date: 2 October 2007
Telephone: (978) 552-2105
Task No.: 0313

II. Narrative Chronology

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Narrative Chronology

Introduction

The Factory H site is located at 77 Cooper Street in the City of Meriden, New Haven County, Connecticut (CT) (see Appendix A – Figures: Figure 1 – Site Location Map) [1]. The geographic coordinates, as measured from the approximate center of the Factory H site, are 41° 32' 2.9" north latitude and 72° 48' 25.3" west longitude. During 2004, asbestos and other contaminants were removed from areas throughout the property. The potential for asbestos and lead-based paint exists in those areas not addressed during previous removal actions. Weston Solutions, Inc., Region I Superfund Technical Assessment and Response Team (START) was tasked with performing a Preliminary Assessment/Site Investigation (PA/SI) at the Factory H site to determine the nature and extent of remaining contamination.

Site Description

The Factory H site is part of a 7.2-acre property, known as the former International Silver Company (Co.) property, which is located in a mixed residential- and commercial-zoned area of downtown Meriden (see Appendix A – Figures: Figure 2 – Property Diagram). The former International Silver Co. property is bordered by a restaurant to the north; apartment complexes to the northeast; railroad tracks and residences to the east; Cooper Street to the south; and a medical center and residences to the west. The former International Silver Co. property is currently owned by the City of Meriden. The property includes three buildings: Building A, Building B, and Building C.

The Factory H site encompasses Building A, which is discussed in detail below. Building B is a 900-square-foot (ft²), two-story transformer/electrical house that was constructed in the 1940s. Building C is a 3,600-ft², two-story power plant and boiler house that was also constructed during the 1940s. A fourth building, Building D, was constructed in approximately 1854, and was destroyed by a fire in 1980 and subsequently demolished.

Building A is a 76,000-ft², brick building that was constructed in two phases: the first phase circa 1866 and the second phase circa 1947. Building A is comprised of three connected sections: a one-story saw-tooth-style section (Factory H); a small two-story section along the western side of the building; and a four-story section along the northern portion of the building (see Appendix A – Figures: Figure 2A – Site Diagram). The second story of the four-story section extends over part of Factory H. Harbor Brook flows north to south along the eastern portion of the Factory H site.

Site History

Beginning in 1891, the International Silver Co. property consisted of two parcels located to the west and east of Harbor Brook, and operated respectively by C. Rogers and Brothers (Bros.) Silverware (later known as U.S. Silver) and Parker Bros. Gun Works. International Silver Co. acquired U.S. Silver at an unknown date and purchased the Parker Bros. Gun Works property during the 1930s. International Silver Co. combined the two parcels and operated the facility, known as Factory H, for the production of flatware and cutlery until operations ceased in

approximately 1974. The International Silver Co. property has remained unoccupied since that time [2].

In approximately 1985, the International Silver Co. property was acquired by MidState Medical Center, who approached Connecticut Department of Environmental Protection (CT DEP) subsequent to their discovery of widespread contamination on the property. The property was then sold to BL&A Associates (BL&A) at an unknown time [4].

In June 1988, HRP Associates, Inc. (HRP) completed a Site Assessment (SA) report for the International Silver Co. property on behalf of BL&A. HRP identified 11 underground storage tanks (USTs); five aboveground storage tanks (ASTs); suspected asbestos-containing material (ACM); visibly stained soils; unidentified debris piles; dust piles generated from the facility's dust collectors; miscellaneous sumps, floor drains, catchbasins, and a dry well; suspected lead paint; and stained interior building surfaces. Analytical results of soil samples collected from 13 soil borings advanced by HRP in the northeastern corner of the property indicated an area of contaminated soil containing trichloroethylene (TCE) at a concentration of 873 parts per billion (ppb) and tetrachloroethylene (PCE) at a concentration of 924 ppb, as well as xylene (153 ppb), toluene (392 ppb), chromium [0.23 parts per million (ppm)], copper (15 ppm), and nickel (4.2 ppm). Additional analytical results indicated the presence of TCE (69 ppb), PCE (33 ppb), trans-1,2-dichloroethylene (trans-1,2-DCE) (20 ppb), and methylene chloride (2 ppb) in groundwater samples; the presence of TCE (10 ppb) in surface water samples collected from Harbor Brook; and the presence of copper (65 ppm), nickel (46 ppm), and silver (0.06 ppm) in samples collected from dust piles [2].

On 24 January 1990, Advanced Environmental Interface, Inc. (AEI) completed a report entitled *Assessment of Site Environmental Conditions*, documenting the contents of four 55-gallon drums, the presence of friable asbestos in pipe insulation, and the presence of non-friable asbestos in floor tiles, roof shingles, and AST insulation located outside the on-site buildings [2].

On 17 December 1990, ICF Kaiser Engineers, Inc. (ICF) completed an Underground Storage Tank Sampling Report, documenting the presence of petroleum products in four of 11 on-site USTs. All product contained in these four USTs was subsequently removed by ICF and/or their contractors [2].

In 1992, a Civil Action was brought against International Silver Co. [the Potentially Responsible Party (PRP)] by CT DEP, resulting in the establishment of an escrow account to be used for addressing environmental conditions at the former International Silver Co. property under the direction of CT DEP [3].

On 9 January 1998, Roy F. Weston, Inc. (now known as Weston Solutions, Inc.) START completed a Removal PA/SI Report on behalf of U.S. Environmental Protection Agency (EPA) Emergency Planning and Response Branch (EPRB) and EPA Brownfields Program. Analytical results of surface soil/dust samples collected during the PA/SI indicated the presence of acetone (380 ppb), cyanide (41 ppm), and Aroclor-1260 (0.22 ppm). Analytical results of liquid samples collected from tanks and drums indicated the presence of acetone (250 ppb), toluene (330 ppb), ethylbenzene (570 ppb), total xylene (4,600 ppb), bis(2-ethylhexyl)-phthalate (150 ppb), naphthalene (1,400 ppb), benzoic acid (1,900 ppb), and 2-methylnaphthalene (600 ppb). In addition, analytical results confirmed the presence of asbestos in Buildings A and C. Based on the

results of the PA/SI, EPA determined that a removal action was warranted at the former International Silver Co. property [4]. However, EPA did not commit federal funding to address the property at this time due to an excess of \$1,000,000 being available to CT DEP from the account established by the PRP in 1992.

In September 1999, a Brownfields Targeted Site Assessment Final Report was completed by EPA.

Additional investigations conducted at the former International Silver Co. property include a Supplemental Phase II, Environmental Site Evaluation, conducted by GZA GeoEnvironmental, Inc., in June 2000.

During 2004, CT DEP oversaw various removal and stabilization activities conducted at the former International Silver Co. property by AEI and their contractor, Fleet Environmental (Fleet). Activities conducted by Fleet included the removal of the following potential sources of contamination: all ACM that had fallen or appeared at risk of falling inside Building C, Building B, and sections of Building A; all ACM present on the grounds surrounding the on-site buildings; contents of remaining ASTs and USTs, including a 10,000-gallon wastewater UST; and 1,400 tons of soil. Soil was excavated to a depth of 2 feet from the area beneath the dust collectors that are located between Building A and Harbor Brook [5].

In 2004, CT DEP exhausted the escrow account available to address environmental conditions at the former International Silver Co. property. As funds were insufficient to remediate the property in its entirety, the property was referred to EPA to identify remaining issues and to determine if conditions warranted further removal actions.

On 12 July 2007, EPA On-Scene Coordinators (OSCs) Athanasios Hatzopoulos and Wing Chau conducted a reconnaissance at the Factory H site to document site conditions. The Factory H site consists of Building A (which includes the one-story Factory H section and the four-story section) and its immediately surrounding area, encompassing those areas not addressed by prior remediation actions. The following concerns were observed during the on-site reconnaissance: possible asbestos and lead contamination; openings in the floor of Factory H where the sub-floor is exposed; evidence of trespassers (*i.e.*, burned debris piles, broken glass windows, and graffiti); and a potential for fire due to excessive wood debris and a lack of fire protection throughout the building. In addition, private residences were observed within approximately 50 feet of the Factory H site.

On 13 July 2007, the City of Meriden formally requested that EPA conduct a removal action due to the concerns listed above.

Site Activities

On 25 July 2007, EPA OSC Hatzopoulos and START members Carolyn Imbres, Alysha Lynch, and Cheryl Henlin mobilized to the Factory H site to conduct suspected ACM and debris sampling activities. START member Imbres conducted a safety and operations meeting, and on-site personnel reviewed and signed the site health and safety plan (HASP). The HASP was prepared as a separate document, entitled *Weston Solutions, Inc., Region I START Health and Safety Plan (HASP) INSILCO Factory H Property, Meriden, New Haven County, Connecticut*. START members established a support zone and calibrated a combustible gas indicator/oxygen

meter (CGI/O₂) for the purpose of conducting air monitoring. Background levels were recorded on an air calibration field data sheet as follows: oxygen (O₂) = 20.9%; lower explosive limit (LEL) = 0%; carbon monoxide (CO) = 0 ppm; and hydrogen sulfide (H₂S) = 0 ppm.

Additional personnel that arrived on the Factory H site included Trudy Magnolia, Economic Development Assistant for the City of Meriden; City of Meriden Mayor Mark Benigni; CT DEP Emergency Response Coordinator Donnell Thigpen; and a representative from Metcalf & Eddy.

START personnel collected 13 grab suspected ACM samples and 11 debris samples from Factory H and its immediately surrounding area using dedicated sampling equipment (see Appendix A – Figures: Figure 3A – Sample Location Map Building A, Factory H), and collected eight suspected ACM samples and seven debris samples from areas of the four-story section (see Appendix A – Figures: Figure 3B – Sample Location Map Building A, Four-Story Section Second and Third Floors). Debris samples were grab samples collected from the floor and included paint chips from a nearby wall. Suspected ACM samples were collected from fallen pipe insulation, wall insulation, roof shingles, floor tiles, or other fibrous material found on the floor. Descriptions of samples collected are summarized in Table 1 (see Appendix B – Tables: Table 1 – Sample Descriptions Factory H Site). Debris samples were collected for lead analysis, and suspected ACM samples were collected for asbestos analysis. Sampling activities were performed in accordance with the site sampling and analysis plan (SAP) and its included revisions, which was prepared as a separate document, entitled *Sampling and Analysis Plan for the INSILCO Factory H Property, Meriden, New Haven County, Connecticut*. Air monitoring conducted in the proximity of each sample location indicated no readings above background levels. Site features and selected sample locations were photodocumented by START member Imbres (See Appendix C – Photodocumentation Log).

Samples were transported to the EPA Office of Environmental Measurement and Evaluation (OEME) located in North Chelmsford, Massachusetts and were relinquished to the EPA OEME sample custodian (see Appendix D – Chain-of-Custody Records). All 18 debris samples were submitted for lead analysis via X-Ray Fluorescence (XRF), and four of these samples were also submitted for confirmation analysis via Inductively Coupled Plasma (ICP). All 21 suspected ACM samples were submitted for analyses via Polarized Light Microscopy (PLM). Analytical data are presented in Appendix B – Tables: Table 2 – Bulk Asbestos Analyses, and Table 3 – Lead in Debris Analyses.

Analytical Data Summaries

On 13 and 21 August 2007, START received asbestos and lead analytical data results, respectively, from OEME [6, 7]. These data have been summarized in Tables 4 and 5 of Appendix B (see Appendix B – Tables: Table 4 – Summary of Asbestos Results and Table 5 – Summary of Lead in Debris Analytical Sampling Results).

Of the 21 samples submitted for asbestos analysis, 19 samples were found to contain chrysotile fibers, at concentrations ranging from 2.0% to 45.0%, and five samples were found to contain amosite fibers at concentrations ranging from 1.0% to 15.0%. The highest concentrations of asbestos were found in samples collected from pipe insulation and from the floor beneath piping. Relatively lower concentrations of asbestos (up to 3.0%) were found in floor tiles and roof shingles. No asbestos was detected in the one sample collected from interior wall insulation.

Lead was detected in all 18 debris samples submitted for analysis via XRF, at concentrations ranging from 450 milligrams per kilogram (mg/Kg) to 6,600 mg/Kg. Lead was detected in all four samples submitted for confirmation analyses via ICP, at concentrations ranging from 1,500 mg/Kg to 5,600 mg/Kg.

REFERENCES

- [1] USGS (U.S. Geological Survey). 1985 (Photorevised Edition). Meriden, CT (7.5-minute series topographic map).
- [2] Roy F. Weston, Inc., Region 1 Superfund Technical Assessment and Response Team (START). Background Summary Memorandum for *International Silver Co., Factory H, Meriden, Connecticut*. September 1997.
- [3] Imbres, Carolyn (Weston Solutions, Inc., START). Telephone Conversation Record with Mr. Ray Frigon [Connecticut Department of Environmental Protection (CT DEP)], Re: Chronology of ownership and removal activities conducted at Former International Silver Company. 21 August 2007.
- [4] Roy F. Weston, Inc. START. *Removal Program Preliminary Assessment/Site Investigation Report for the Former International Silver Company Site, Meriden, Connecticut*, 22 December 1997.
- [5] Imbres, Carolyn (Weston Solutions, Inc. START). Telephone Conversation Record with Mr. Joseph Santovasi (Advanced Environmental Interface, Inc.), Re: Summary of removal activities conducted at Former International Silver Company. 10 August 2007.
- [6] U.S. Environmental Protection Agency (EPA). 3 August 2007. Office of Environmental Measurement and Evaluation (OEME), Laboratory Report, INSILCO Factory H Property, Meriden, Connecticut, Bulk Asbestos Analysis by PLM.
- [7] EPA. 7 August 2007. OEME, Laboratory Report, INSILCO Factory H Property, Meriden, Connecticut, Lead by XRF.

III. Appendices

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Appendix A

Figures

Figure 1 – Site Location Map

Figure 2 – Property Diagram

Figure 2A – Site Diagram

Figure 3A – Sample Location Map Building A, Factory H

Figure 3B – Sample Location Map Building A, Four-Story Section, Second and Third Floors

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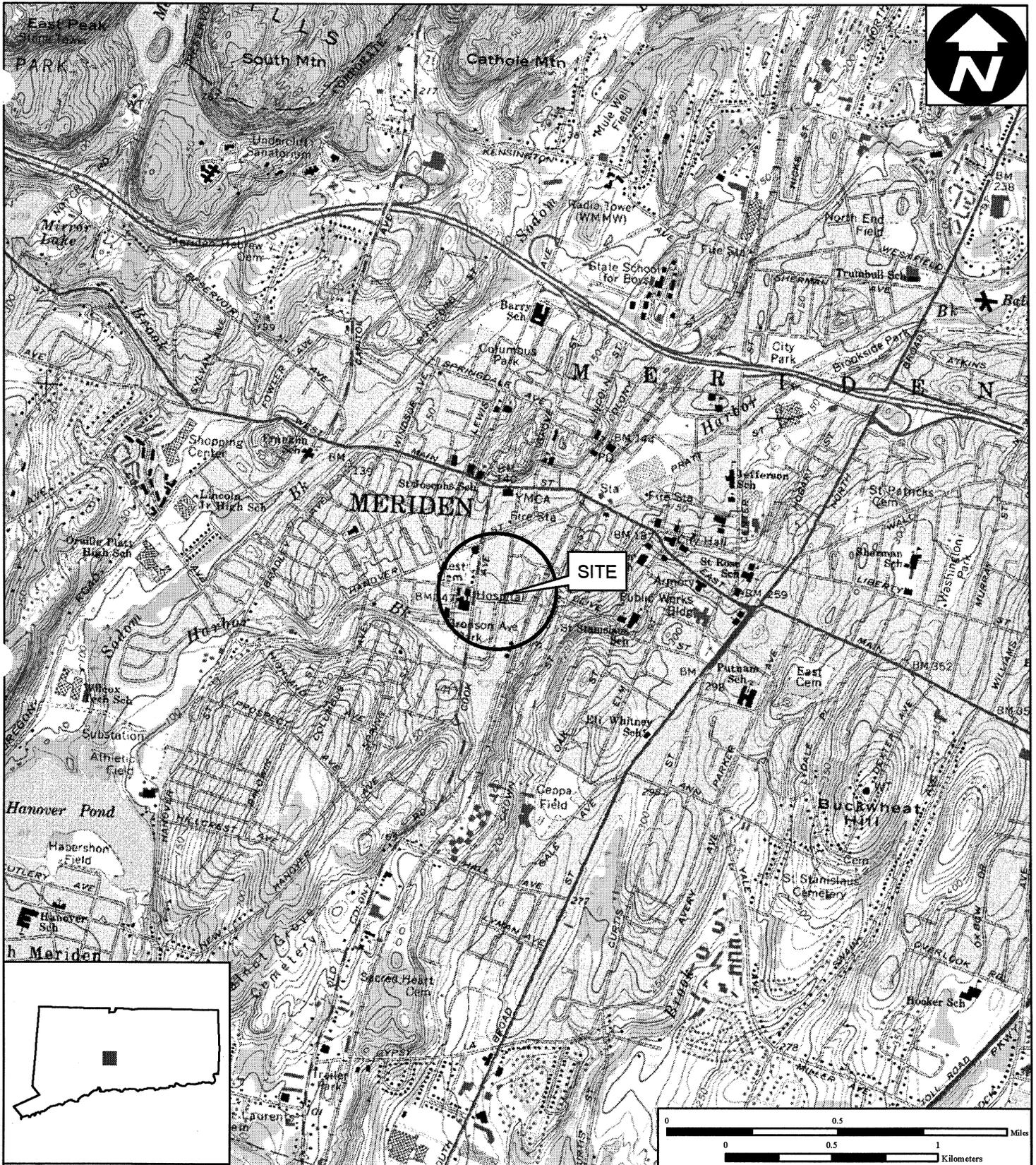


Figure 1

Site Location Map

**Factory H Site
77 Cooper Street
Meriden, Connecticut**

**EPA Region I
Superfund Technical Assessment and
Response Team (START) III
Contract No. EP-W-05-042**

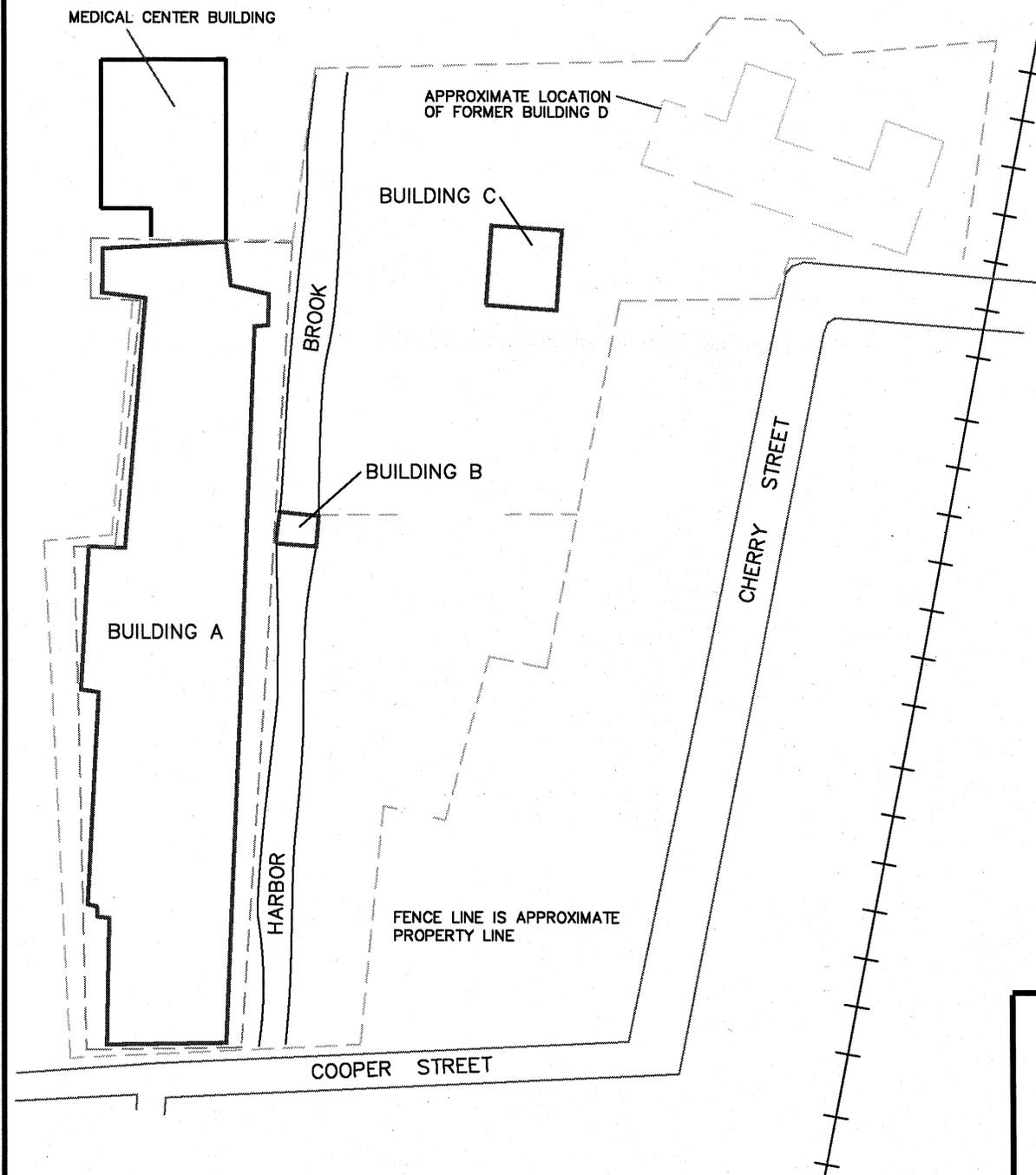
TDD Number: 07-06-0010
Created by: Carolyn Imbres
Created on: 20 July 2007
Modified by: Carolyn Imbres
Modified on: 23 July 2007

Data Sources:
Topos: MicroPath/USGS
Quadrangle Name: MERIDEN, CT
All other data: START



Restoring Resource Efficiency
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LEGEND

- +--- RAILROAD TRACKS
- FENCE
- - - SITE BOUNDARY

NOT TO SCALE

PROPERTY DIAGRAM
FORMER INTERNATIONAL SILVER COMPANY
AND FACTORY H SITE
77 COOPER STREET
MERIDEN, CONNECTICUT

WESTON SOLUTIONS
REGION I SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM

TDD # 07-06-0010	DRAWN BY: C. IMBRES	DATE AUGUST 2007
FILE NAME: R/07060010/Figures/Figure2.DWG		FIGURE 2



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WESTERN
SCHOOL OF MANAGEMENT
1000 UNIVERSITY AVENUE
SUITE 1000
DENVER, CO 80202
TEL: 303.733.1000
WWW.WESTERNMBA.COM

LOWER MERITAMPA SILEX TEMPAL
1000 UNIVERSITY AVENUE
SUITE 1000
DENVER, CO 80202
TEL: 303.733.1000
WWW.WESTERNMBA.COM



FOUR-STORY SECTION

AREA OF ASBESTOS REMOVAL ON SECOND FLOOR

BUILDING A

TWO-STORY SECTION

FACTORY H

BROOK

HARBOR

LEGEND



STAIRWELL



BUILDING BOUNDARY



INTERIOR WALL



BOUNDARY OF SECOND FLOOR OF FOUR-STORY SECTION

NOT TO SCALE

SITE DIAGRAM

FACTORY H SITE
77 COOPER STREET
MERIDEN, CONNECTICUT



REGION I SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM

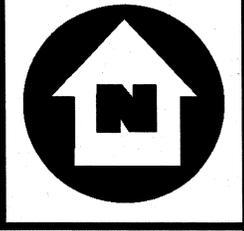
TDD #
07-06-0010

DRAWN BY:
C. Imbres

DATE
August 2007

FILE NAME:
R:\070600010\FIG2A.DWG

FIGURE 2A



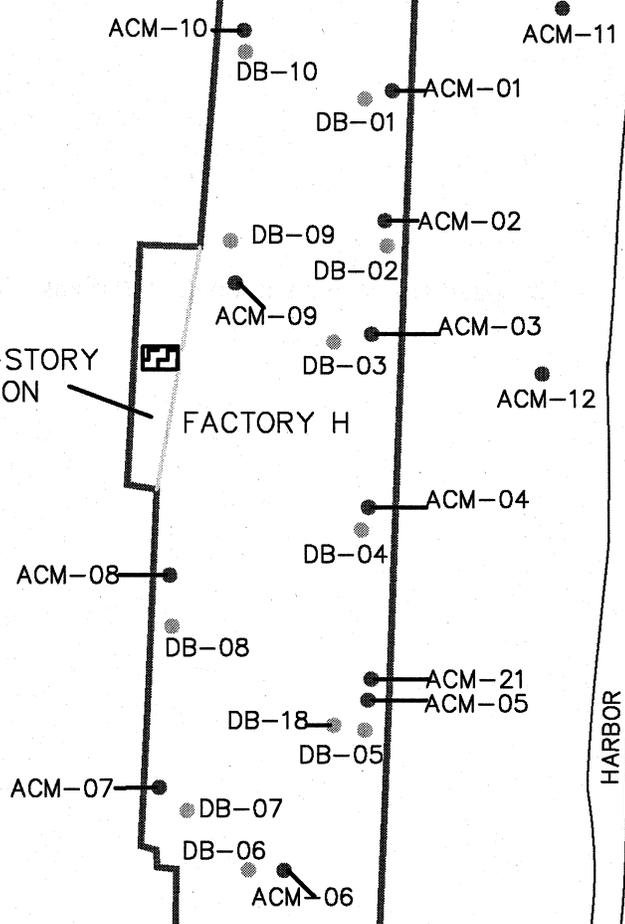
FOUR-STORY SECTION

TWO-STORY SECTION

FACTORY H

BROOK

HARBOR



NOT TO SCALE

LEGEND

- ASBESTOS SAMPLING LOCATION
- DEBRIS SAMPLING LOCATION

- INTERIOR WALL
-  STAIRWELL

- ACM = ASBESTOS-CONTAINING MATERIAL
- DB = DEBRIS

SAMPLE LOCATION MAP
BUILDING A, FACTORY H

FACTORY H SITE
 77 COOPER STREET
 MERIDEN, CONNECTICUT



REGION I SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM

TDD #
07-06-0010

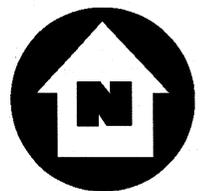
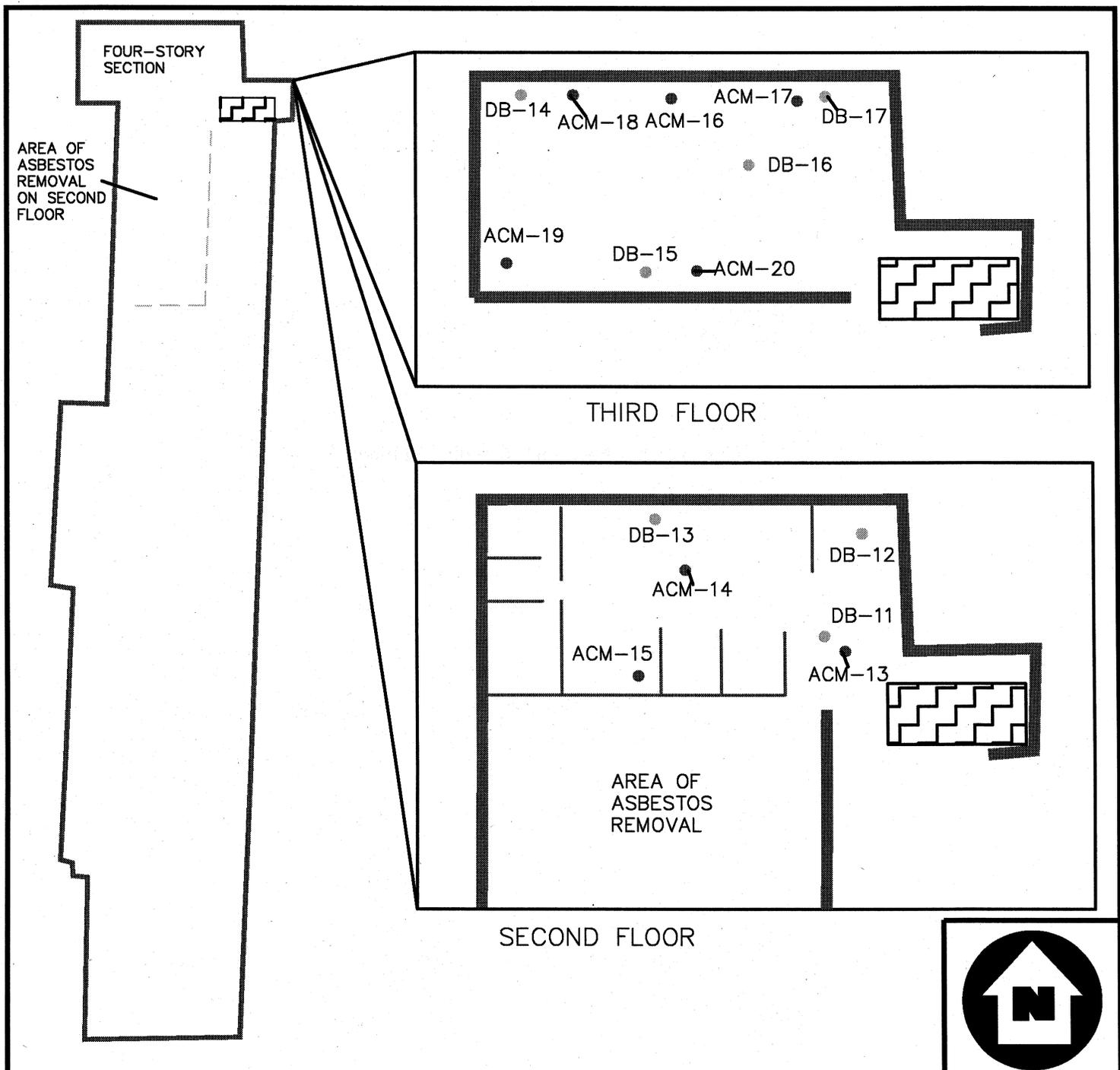
DRAWN BY:
C. Imbres

DATE
August 2007

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FIGURE 3A

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LEGEND

● ASBESTOS SAMPLING LOCATION

--- BOUNDARY OF SECOND FLOOR

▬ BUILDING BOUNDARY

ACM = ASBESTOS-CONTAINING MATERIAL

● DEBRIS SAMPLING LOCATION

— INTERIOR WALL

▭ STAIRWELL

DB = DEBRIS

NOT TO SCALE

SAMPLE LOCATION MAP
BUILDING A, FOUR-STORY SECTION
SECOND AND THIRD FLOORS

FACTORY H SITE
 77 COOPER STREET
 MERIDEN, CONNECTICUT



REGION I SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM

TDD #
 07-06-0010

DRAWN BY:
 C. Imbres

DATE
 August 2007

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FIGURE 3B

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Appendix B

Tables

Table 1 – Sample Descriptions Factory H Site

Table 2 – Bulk Asbestos Analyses

Table 3 – Lead in Debris Analyses

Table 4 – Summary of Asbestos Results

Table 5 – Summary of Lead in Debris Analytical Sampling Results

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TABLE 1

**Sample Descriptions
Factory H Site
Meriden, Connecticut**

Station No. and EPA Sample No.	Sample Date	Sample Type and Matrix	Grab or Composite	Sample Depth (Inches)	Color	Sample Description	Comments
DB-01 0313-0028	7/25/07	Debris	Grab	NA	Grey/brown	Building debris (glass, wood, paint chips)	Paint chips collected from EW of Factory H. MS/MSD Sample
DB-02 0313-0029	7/25/07	Debris	Grab	NA	Grey/brown	Building debris (brick, paint chips)	Paint chips collected from EW of Factory H
DB-03 0313-0030	7/25/07	Debris	Grab	NA	Brown	Building debris (wood, glass, ACM, paint chips)	Paint chips collected from EW of Factory H
DB-04 0313-0031	7/25/07	Debris	Grab	NA	Grey	Building debris (brick, paint chips); trace organics	Paint chips collected from EW of Factory H
DB-05 0313-0032	7/25/07	Debris	Grab	NA	Grey/light brown	Building debris (glass, wood, paint chips); trace organics	Paint chips collected from EW of Factory H
DB-06 0313-0033	7/25/07	Debris	Grab	NA	Brown with trace white	Building debris (wood)	None
DB-07 0313-0034	7/25/07	Debris	Grab	NA	Brown with trace white	Building debris (wood, metal)	None
DB-08 0313-0035	7/25/07	Debris	Grab	NA	Brown/white	Building debris (wood, metal)	None
DB-09 0313-0036	7/25/07	Debris	Grab	NA	Grey	Building debris (paint chips)	Paint chips collected from wall of room located off WW of Factory H
DB-10 0313-0037	7/25/07	Debris	Grab	NA	Brown with trace white	Building debris (wood, metal dust)	None
DB-11 0313-0038	7/25/07	Debris	Grab	NA	Brown with trace white	Building debris (wood, metal dust)	None
DB-12 0313-0039	7/25/07	Debris	Grab	NA	Brown with trace white	Building debris (wood, metal dust)	None
DB-13 0313-0040	7/25/07	Debris	Grab	NA	Brown with trace white	Building debris (wood, metal dust)	None
DB-14 0313-0041	7/25/07	Debris	Grab	NA	Red	Building debris (brick, paint chips)	None
DB-15 0313-0042	7/25/07	Debris	Grab	NA	Grey/red	Building debris (brick, paint chips)	Paint chips collected from SW of third floor of four-story section
DB-16 0313-0043	7/25/07	Debris	Grab	NA	Grey	Building debris (paint chips); trace organics	None
DB-17 0313-0044	7/25/07	Debris	Grab	NA	Red/white/brown	Building debris (paint chips); guano	None

TABLE 1
Sample Descriptions
Factory H Site
Meriden, Connecticut

Station No. and EPA Sample No.	Sample Date	Sample Type and Matrix	Grab or Composite	Sample Depth (Inches)	Color	Sample Description	Comments
DB-18 0313-0045	7/25/07	Debris	Grab	NA	Grey/light brown	Building debris (glass, wood, paint chips); trace organics	Duplicate of DB-05
ACM-01 0313-0007	7/25/07	Solid	Grab	NA	White with trace yellow	Fibrous pipe insulation FF	MS/MSD Sample
ACM-02 0313-0008	7/25/07	Solid	Grab	NA	White	Fibrous pipe insulation FF	None
ACM-03 0313-0009	7/25/07	Solid	Grab	NA	White	Fibrous clump FF	None
ACM-04 0313-0010	7/25/07	Solid	Grab	NA	White	Fibrous pipe insulation FF	Sample collected off of fallen pipe
ACM-05 0313-0011	7/25/07	Solid	Grab	NA	White/light grey	Fibrous clump FF	None
ACM-06 0313-0012	7/25/07	Solid	Grab	NA	White	Fibrous pipe insulation FF	None
ACM-07 0313-0013	7/25/07	Solid	Grab	NA	White with trace black	Fibrous clump FF	None
ACM-08 0313-0014	7/25/07	Solid	Grab	NA	White	Fibrous pipe insulation	Sample collected off of piece of equipment
ACM-09 0313-0015	7/25/07	Solid	Grab	NA	White	Fibrous clump FF	None
ACM-10 0313-0016	7/25/07	Solid	Grab	NA	White	Fibrous clump FF	None
ACM-11 0313-0017	7/25/07	Solid	Grab	NA	Black with trace white	Fibrous shingle	Sample collected from ground outside of EW of Factory H
ACM-12 0313-0018	7/25/07	Solid	Grab	NA	Black/grey with trace white	Fibrous shingle	Sample collected from ground outside of EW of Factory H
ACM-13 0313-0019	7/25/07	Solid	Grab	NA	Black	Compacted, fibrous tile FF	Sample collected FF tile on second floor of four-story section
ACM-14 0313-0020	7/25/07	Solid	Grab	NA	Orange brown	Wall insulation FF	None
ACM-15 0313-0021	7/25/07	Solid	Grab	NA	Black	Compacted, fibrous tile FF	Sample collected FF tile on second floor of four-story section
ACM-16 0313-0022	7/25/07	Solid	Grab	NA	White	Fibrous pipe insulation FF	None
ACM-17 0313-0023	7/25/07	Solid	Grab	NA	White	Fibrous pipe insulation FF	None

TABLE 1
Sample Descriptions
Factory H Site
Meriden, Connecticut

Station No. and EPA Sample No.	Sample Date	Sample Type and Matrix	Grab or Composite	Sample Depth (Inches)	Color	Sample Description	Comments
ACM-18 0313-0024	7/25/07	Solid	Grab	NA	White	Fibrous pipe insulation FF	None
ACM-19 0313-0025	7/25/07	Solid	Grab	NA	White	Fibrous pipe insulation FF	None
ACM-20 0313-0026	7/25/07	Solid	Grab	NA	White	Fibrous pipe insulation FF	None
ACM-21 0313-0027	7/25/07	Solid	Grab	NA	White/light grey	Fibrous clump FF	Duplicate of ACM-05

NA = Not Applicable
MS/MSD = Matrix Spike/Matrix Spike Duplicate
ACM = Asbestos-Containing Material
DB = Debris
EW = Eastern Wall
WW = Western Wall
SW = Southern Wall
FF = From Floor

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SITE: FACTORY H SITE
 PROJECT NO.: 07070051
 LABORATORY: OEME

TABLE 2
 BULK ASBESTOS ANALYSES
 VOLUME %

SAMPLE LOCATION: ACM-01 ACM-02 ACM-03 ACM-04 ACM-05 ACM-06
 SAMPLE NUMBER: 0313-0007 0313-0008 0313-0009 0313-0010 0313-0011 0313-0012
 LABORATORY NUMBER: AA73144 AA73145 AA73146 AA73147 AA73148 AA73149
 DATE SAMPLED: 7/25/2007 7/25/2007 7/25/2007 7/25/2007 7/25/2007 7/25/2007

ANALYTES	METHOD	INSTRUMENT DETECTION LIMIT	ACM-01 0313-0007 AA73144 7/25/2007	ACM-02 0313-0008 AA73145 7/25/2007	ACM-03 0313-0009 AA73146 7/25/2007	ACM-04 0313-0010 AA73147 7/25/2007	ACM-05 0313-0011 AA73148 7/25/2007	ACM-06 0313-0012 AA73149 7/25/2007
Actinolite	PLM	1.0	ND	ND	ND	ND	ND	ND
Amosite	PLM	1.0	ND	ND	ND	1.0	ND	ND
Anthophyllite	PLM	1.0	ND	ND	ND	ND	ND	ND
Chrysotile	PLM	1.0	20.0	20.0	45.0	40.0	45.0	40.0
Crocidolite	PLM	1.0	ND	ND	ND	ND	ND	ND
Tremolite	PLM	1.0	ND	ND	ND	ND	ND	ND

SAMPLE LOCATION: ACM-07 ACM-08 ACM-09 ACM-10 ACM-11 ACM-12
 SAMPLE NUMBER: 0313-0013 0313-0014 0313-0015 0313-0016 0313-0017 0313-0018
 LABORATORY NUMBER: AA73150 AA73151 AA73152 AA73153 AA73154 AA73155
 DATE SAMPLED: 7/25/2007 7/25/2007 7/25/2007 7/25/2007 7/25/2007 7/25/2007

ANALYTES	METHOD	INSTRUMENT DETECTION LIMIT	ACM-07 0313-0013 AA73150 7/25/2007	ACM-08 0313-0014 AA73151 7/25/2007	ACM-09 0313-0015 AA73152 7/25/2007	ACM-10 0313-0016 AA73153 7/25/2007	ACM-11 0313-0017 AA73154 7/25/2007	ACM-12 0313-0018 AA73155 7/25/2007
Actinolite	PLM	1.0	ND	ND	ND	ND	ND	ND
Amosite	PLM	1.0	ND	ND	ND	12.0	ND	ND
Anthophyllite	PLM	1.0	ND	ND	ND	ND	ND	ND
Chrysotile	PLM	1.0	3.0	40.0	2.0	2.0	ND	3.0
Crocidolite	PLM	1.0	ND	ND	ND	ND	ND	ND
Tremolite	PLM	1.0	ND	ND	ND	ND	ND	ND

ACM - Asbestos Containing Material.
 PLM - Polarized Light Microscopy/NIOSH 9002.
 ND - No Fibers Detected.
 OEME - Office of Environmental Measurement and Evaluation.
 % - Percent
 NO. - Number

SITE: FACTORY H SITE
 PROJECT NO.: 07070051
 LABORATORY: OEME

TABLE 2
 BULK ASBESTOS ANALYSES
 VOLUME %

SAMPLE LOCATION: ACM-13 ACM-14 ACM-15 ACM-16 ACM-17 ACM-18
 SAMPLE NUMBER: 0313-0019 0313-0020 0313-0021 0313-0022 0313-0023 0313-0024
 LABORATORY NUMBER: AA73156 AA73157 AA73158 AA73159 AA73160 AA73161
 DATE SAMPLED: 7/25/2007 7/25/2007 7/25/2007 7/25/2007 7/25/2007 7/25/2007

ANALYTES	METHOD	INSTRUMENT DETECTION LIMIT	ACM-13 0313-0019 AA73156 7/25/2007	ACM-14 0313-0020 AA73157 7/25/2007	ACM-15 0313-0021 AA73158 7/25/2007	ACM-16 0313-0022 AA73159 7/25/2007	ACM-17 0313-0023 AA73160 7/25/2007	ACM-18 0313-0024 AA73161 7/25/2007
Actinolite	PLM	1.0	ND	ND	ND	ND	ND	ND
Amosite	PLM	1.0	ND	ND	ND	ND	15.0	8.0
Anthophyllite	PLM	1.0	ND	ND	ND	ND	ND	ND
Chrysotile	PLM	1.0	2.0	ND	2.0	8.0	2.0	6.0
Crocidolite	PLM	1.0	ND	ND	ND	ND	ND	ND
Tremolite	PLM	1.0	ND	ND	ND	ND	ND	ND

SAMPLE LOCATION: ACM-19 ACM-20 ACM-21
 SAMPLE NUMBER: 0313-0025 0313-0026 0313-0027
 LABORATORY NUMBER: AA73162 AA73163 AA73164
 DATE SAMPLED: 7/25/2007 7/25/2007 7/25/2007

ANALYTES	METHOD	INSTRUMENT DETECTION LIMIT	ACM-19 0313-0025 AA73162 7/25/2007	ACM-20 0313-0026 AA73163 7/25/2007	ACM-21 0313-0027 AA73164 7/25/2007
Actinolite	PLM	1.0	ND	ND	ND
Amosite	PLM	1.0	ND	8.0	ND
Anthophyllite	PLM	1.0	ND	ND	ND
Chrysotile	PLM	1.0	8.0	8.0	35.0
Crocidolite	PLM	1.0	ND	ND	ND
Tremolite	PLM	1.0	ND	ND	ND

ACM - Asbestos Containing Material.
 PLM - Polarized Light Microscopy/NIOSH 9002.
 ND - No Fibers Detected.
 OEME - Office of Environmental Measurement and Evaluation.
 % - Percent
 NO. - Number

SITE: FACTORY H SITE
 PROJECT NO.: 07070051
 LABORATORY: OEME

TABLE 3
 LEAD IN DEBRIS ANALYSES
 mg/Kg

SAMPLE LOCATION:	DB-01	DB-02	DB-03	DB-04	DB-05	DB-06	DB-07
SAMPLE NUMBER:	0313-0028	0313-0029	0313-0030	0313-0031	0313-0032	0313-0033	0313-0034
LABORATORY NUMBER:	AA73165	AA73166	AA73167	AA73168	AA73169	AA73170	AA73171
DATE SAMPLED:	7/25/2007	7/25/2007	7/25/2007	7/25/2007	7/25/2007	7/25/2007	7/25/2007

INORGANIC ANALYTES METHOD	REPORTING LIMIT	Value
Lead XRF	5	1340
Lead ICP		940
Confirmatory Lead		760
		1820
		1500
		860
		1230
		1880
		2300

SAMPLE LOCATION:	DB-08	DB-09	DB-10	DB-11	DB-12	DB-13	DB-14
SAMPLE NUMBER:	0313-0035	0313-0036	0313-0037	0313-0038	0313-0039	0313-0040	0313-0041
LABORATORY NUMBER:	AA73172	AA73173	AA73174	AA73175	AA73176	AA73177	AA73178
DATE SAMPLED:	7/25/2007	7/25/2007	7/25/2007	7/25/2007	7/25/2007	7/25/2007	7/25/2007

INORGANIC ANALYTES METHOD	REPORTING LIMIT	Value
Lead XRF	5	1020
Lead ICP		3330
Confirmatory Lead		3400
		1110
		6600 J1
		450
		1140
		4580

SAMPLE LOCATION:	DB-15	DB-16	DB-17	DB-18
SAMPLE NUMBER:	0313-0042	0313-0043	0313-0044	0313-0045
LABORATORY NUMBER:	AA73179	AA73180	AA73181	AA73182
DATE SAMPLED:	7/25/2007	7/25/2007	7/25/2007	7/25/2007

INORGANIC ANALYTES METHOD	REPORTING LIMIT	Value
Lead XRF	5	3310
Lead ICP		5600 J3
Confirmatory Lead		2860
		4200
		1320

Confirmation soil samples were analyzed at OEME using an ICP Spectrometer.

DB - Debris.

OEME - Office of Environmental Measurement and Evaluation.

ICP - Inductively Coupled Plasma.

XRF - X-Ray Fluorescence.

J1 - Estimated value because it exceeds the calibration range of the instrument.

J3 - Estimated value due to relative percent difference result outside acceptance criteria.

NO. - Number

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Table 4
Summary of Asbestos Results
Factory H Site
Meriden, Connecticut

Location	Number	Sample Collection Date	PLM Results (% Amosite)	PLM Results (% Chrysotile)
ACM-01	0313-0007	25-Jul-07	ND	20.0
ACM-02	0313-0008	25-Jul-07	ND	20.0
ACM-03	0313-0009	25-Jul-07	ND	45.0
ACM-04	0313-0010	25-Jul-07	1.0	40.0
ACM-05	0313-0011	25-Jul-07	ND	45.0
ACM-06	0313-0012	25-Jul-07	ND	40.0
ACM-07	0313-0013	25-Jul-07	ND	3.0
ACM-08	0313-0014	25-Jul-07	ND	40.0
ACM-09	0313-0015	25-Jul-07	ND	2.0
ACM-10	0313-0016	25-Jul-07	12.0	2.0
ACM-11	0313-0017	25-Jul-07	ND	ND
ACM-12	0313-0018	25-Jul-07	ND	3.0
ACM-13	0313-0019	25-Jul-07	ND	2.0
ACM-14	0313-0020	25-Jul-07	ND	ND
ACM-15	0313-0021	25-Jul-07	ND	2.0
ACM-16	0313-0022	25-Jul-07	ND	8.0
ACM-17	0313-0023	25-Jul-07	15.0	2.0
ACM-18	0313-0024	25-Jul-07	8.0	6.0
ACM-19	0313-0025	25-Jul-07	ND	8.0
ACM-20	0313-0026	25-Jul-07	8.0	8.0
ACM-21	0313-0027	25-Jul-07	ND	35.0

Notes:

- 1) Samples analyzed by U.S. EPA Office of Environmental Measurement and Evaluation (OEME) using US EPA ASED3 SOP for Asbestos in Soil.
- 2) ACM = Asbestos-Containing Material.
- 3) PLM = Polarized Light Microscopy/NIOSH 9002.
- 4) % = Estimated Volume Percent.
- 5) ND = Non-Detect.

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Table 5
Summary of Lead in Debris Analytical Sampling Results
Factory H Site
Meriden, Connecticut

Location	Number	Sample Collection Date	XRF Lead Results (mg/Kg)	ICP Lead Confirmatory Results (mg/Kg)
DB-01	0313-0028	25-Jul-07	1340	-----
DB-02	0313-0029	25-Jul-07	940	-----
DB-03	0313-0030	25-Jul-07	760	-----
DB-04	0313-0031	25-Jul-07	1820	1500
DB-05	0313-0032	25-Jul-07	860	-----
DB-06	0313-0033	25-Jul-07	1230	-----
DB-07	0313-0034	25-Jul-07	1880	2300
DB-08	0313-0035	25-Jul-07	1020	-----
DB-09	0313-0036	25-Jul-07	3330	3400
DB-10	0313-0037	25-Jul-07	1110	-----
DB-11	0313-0038	25-Jul-07	6600 J1	-----
DB-12	0313-0039	25-Jul-07	450	-----
DB-13	0313-0040	25-Jul-07	1140	-----
DB-14	0313-0041	25-Jul-07	4580	-----
DB-15	0313-0042	25-Jul-07	3310	5600 J3
DB-16	0313-0043	25-Jul-07	2860	-----
DB-17	0313-0044	25-Jul-07	4200	-----
DB-18	0313-0045	25-Jul-07	1320	-----

Notes:

- 1) Samples analyzed by U.S. EPA Office of Environmental Measurement and Evaluation (OEME) using US EPA Region 1 SOP, INGXR3.SOP.
- 2) XRF = X-Ray Fluorescence.
- 3) ICP = Inductively Coupled Plasma.
- 4) ---- = Sample not submitted for confirmation analysis.
- 5) J1 = Estimated value because it exceeds the calibration range of the instrument.
- 6) J3 = Estimated value due to relative percent difference result outside acceptance criteria.
- 7) mg/Kg = milligrams per kilogram.
- 8) DB = Debris.

SALES & MARKETING DEPARTMENT
MEMORANDUM
DATE: 10/15/2010

Product Line	Q3 Sales	Q3 Profit	Q3 Units	Q3 Margin
Product A	120,000	30,000	1,200	25%
Product B	80,000	20,000	800	25%
Product C	150,000	37,500	1,500	25%
Product D	90,000	22,500	900	25%
Product E	110,000	27,500	1,100	25%
Product F	130,000	32,500	1,300	25%
Product G	100,000	25,000	1,000	25%
Product H	140,000	35,000	1,400	25%
Product I	160,000	40,000	1,600	25%
Product J	180,000	45,000	1,800	25%

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Appendix C

Photodocumentation Log

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PHOTOGRAPHY LOG SHEET
Factory H Site • Meriden, Connecticut



SCENE: View of the collapsed floor in Factory H.

DATE: 25 July 2007

PHOTOGRAPHY BY: C. Imbres

TIME: 0854 hours

CAMERA: HP Photosmart M22



SCENE: View of the collapsed floor in Factory H.

DATE: 25 July 2007

PHOTOGRAPHY BY: C. Imbres

TIME: 0854 hours

CAMERA: HP Photosmart M22

PHOTOGRAPHY LOG SHEET
Factory H Site • Meriden, Connecticut



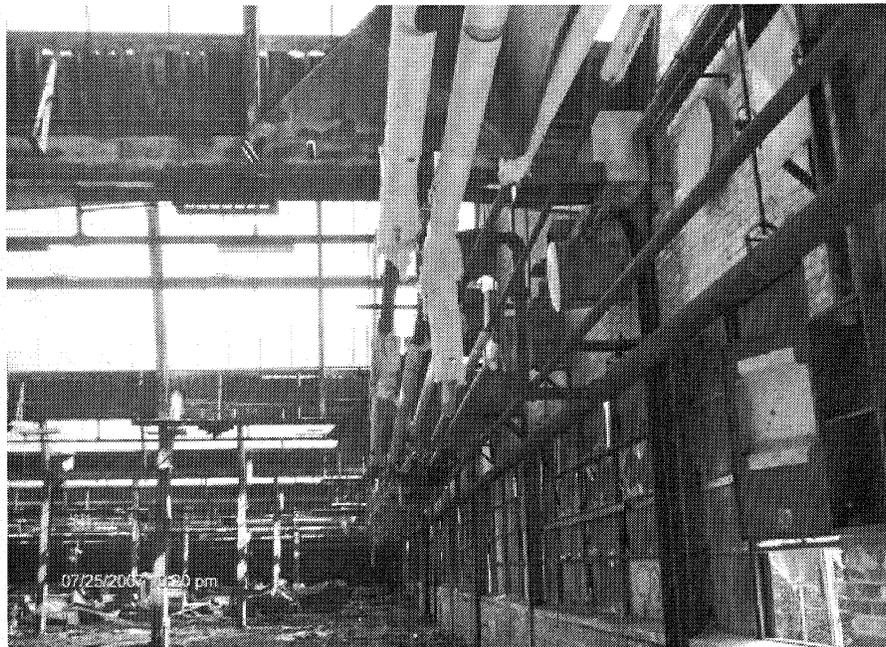
SCENE: View of the western wall of Factory H, along which asbestos-containing material (ACM) samples ACM-07 through ACM-10 and debris (DB) samples DB-07 through DB-10 were collected.

DATE: 25 July 2007

TIME: 0856 hours

PHOTOGRAPHY BY: C. Imbres

CAMERA: HP Photosmart M22



SCENE: View of the eastern wall of Factory H, along which samples ACM-01, ACM-02, DB-01, and DB-02 were collected.

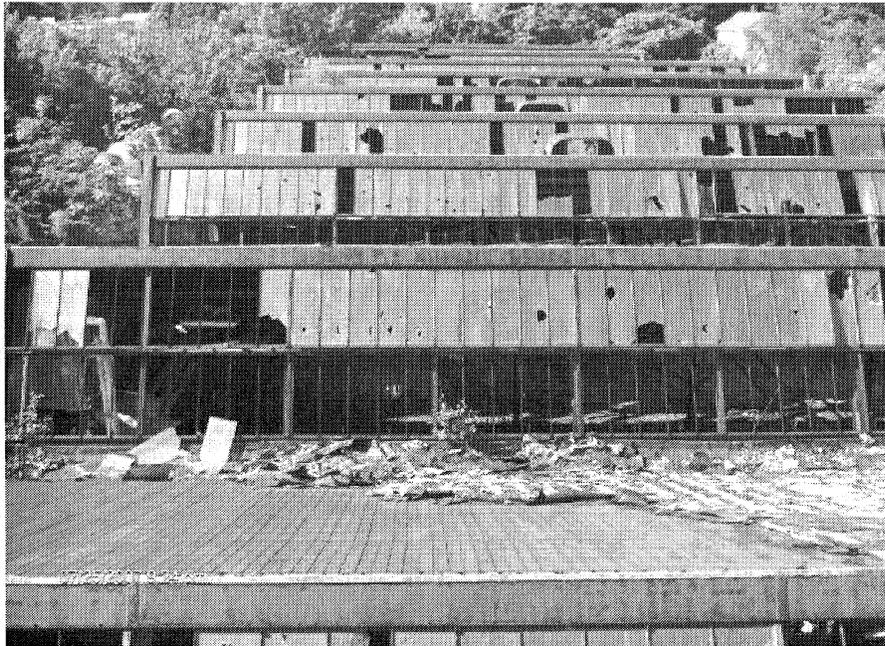
DATE: 25 July 2007

TIME: 0920 hours

PHOTOGRAPHY BY: C. Imbres

CAMERA: HP Photosmart M22

PHOTOGRAPHY LOG SHEET
Factory H Site • Meriden, Connecticut



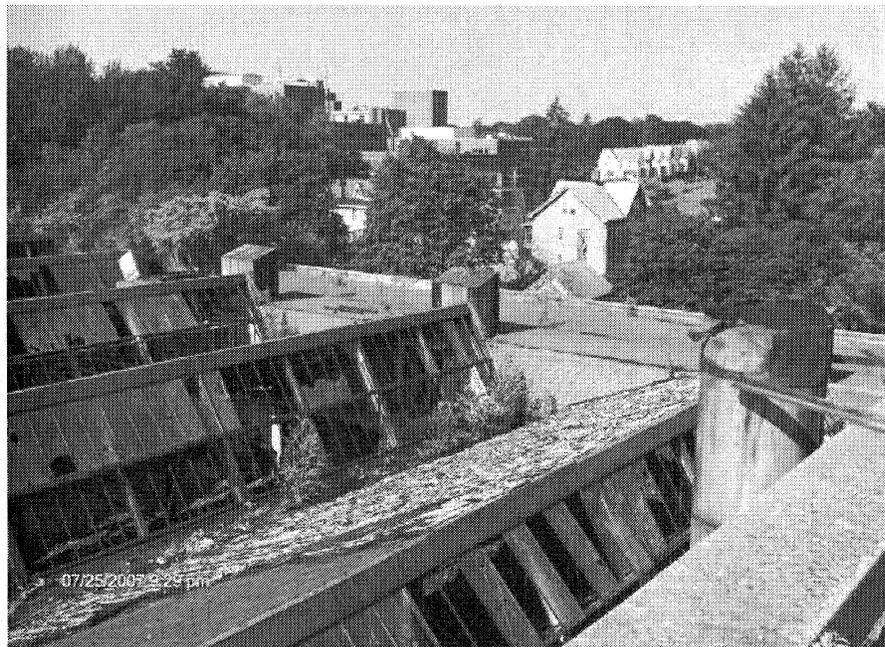
SCENE: View of the roof of Factory H and nearby residences. Photograph taken facing south.

DATE: 25 July 2007

PHOTOGRAPHY BY: C. Imbres

TIME: 0924 hours

CAMERA: HP Photosmart M22



SCENE: View of the roof of Factory H and nearby residences. Photograph taken facing west.

DATE: 25 July 2007

PHOTOGRAPHY BY: C. Imbres

TIME: 0929 hours

CAMERA: HP Photosmart M22

PHOTOGRAPHY LOG SHEET
Factory H Site • Meriden, Connecticut



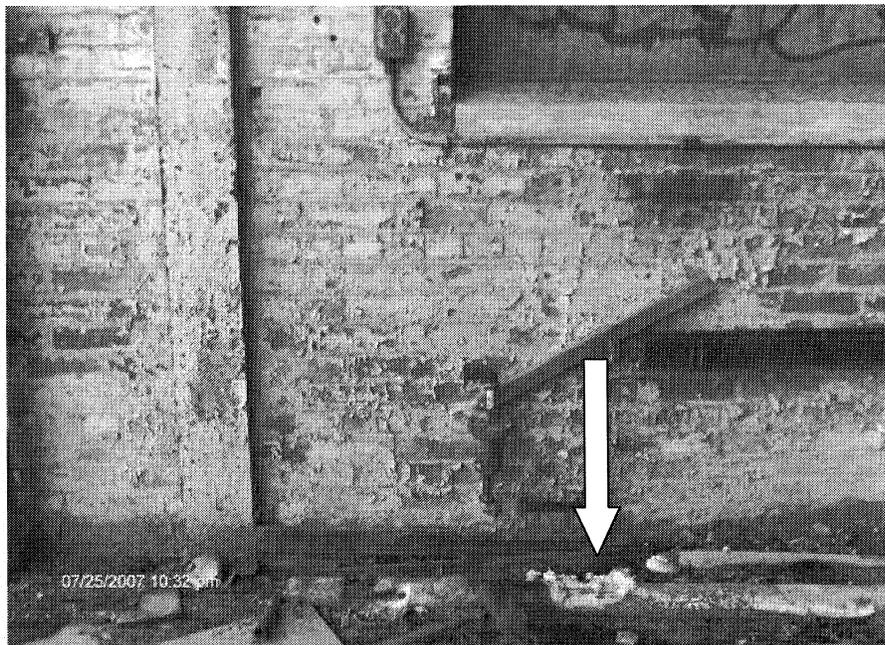
SCENE: View of sample locations ACM-11 and ACM-12, situated along the eastern wall of Factory H.

DATE: 25 July 2007

PHOTOGRAPHY BY: C. Imbres

TIME: 0957 hours

CAMERA: HP Photosmart M22



SCENE: View of sample location ACM-04, collected from suspected ACM pipe wrap that had fallen along the eastern wall of Factory H from piping along the ceiling.

DATE: 25 July 2007

PHOTOGRAPHY BY: C. Imbres

TIME: 1032 hours

CAMERA: HP Photosmart M22

PHOTOGRAPHY LOG SHEET
Factory H Site • Meriden, Connecticut



SCENE: View of pipes and hanging pipe insulation located along the western wall of Factory H.

DATE: 25 July 2007

TIME: 1042 hours

PHOTOGRAPHY BY: C. Imbres

CAMERA: HP Photosmart M22



SCENE: View of building and furniture debris piles located in the northern portion of Factory H.

DATE: 25 July 2007

TIME: 1047 hours

PHOTOGRAPHY BY: C. Imbres

CAMERA: HP Photosmart M22

PHOTOGRAPHY LOG SHEET
Factory H Site • Meriden, Connecticut



SCENE: View of building and furniture debris located in the northern portion of Factory H.

DATE: 25 July 2007

PHOTOGRAPHY BY: C. Imbres

TIME: 1048 hours

CAMERA: HP Photosmart M22



SCENE: View of the interior of Factory H. Photograph taken facing south.

DATE: 25 July 2007

PHOTOGRAPHY BY: C. Imbres

TIME: 1048 hours

CAMERA: HP Photosmart M22

PHOTOGRAPHY LOG SHEET
Factory H Site • Meriden, Connecticut



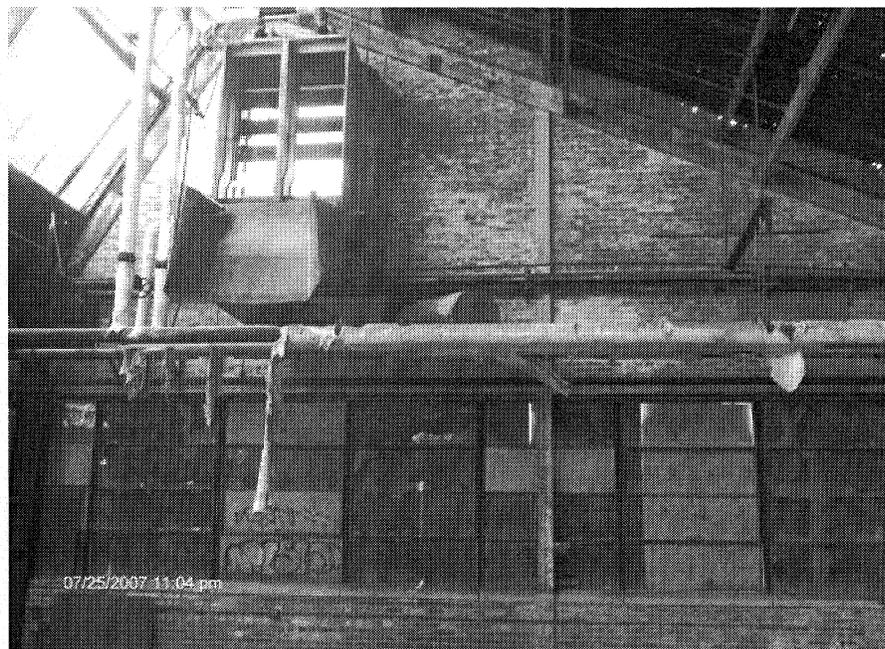
SCENE: View of pipes and hanging pipe insulation located along the eastern wall of Factory H.

DATE: 25 July 2007

PHOTOGRAPHY BY: C. Imbres

TIME: 1104 hours

CAMERA: HP Photosmart M22



SCENE: View of pipes and hanging pipe insulation located in the northwestern corner of Factory H.

DATE: 25 July 2007

PHOTOGRAPHY BY: C. Imbres

TIME: 1104 hours

CAMERA: HP Photosmart M22

PHOTOGRAPHY LOG SHEET
Factory H Site • Meriden, Connecticut



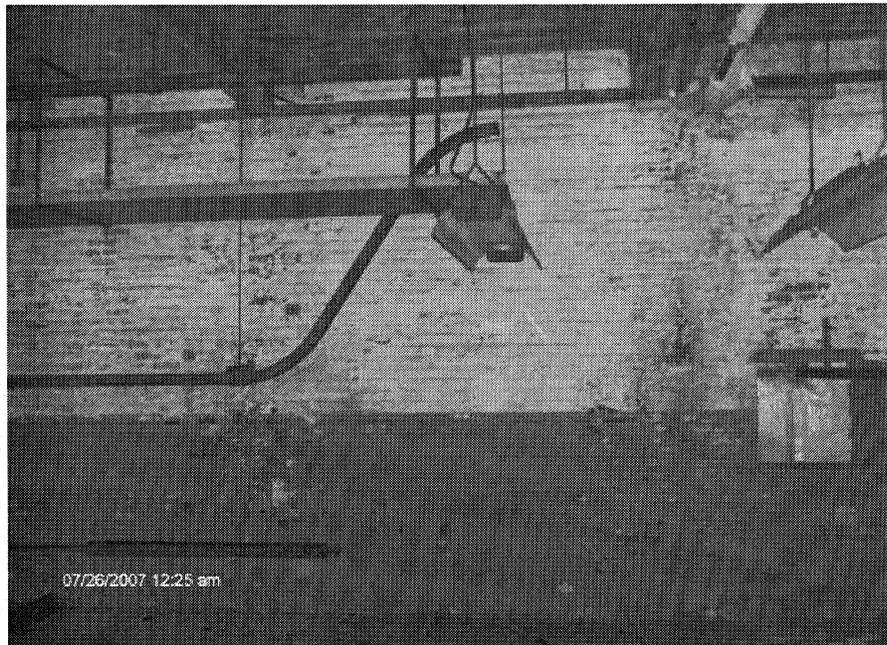
SCENE: View of the room on the second story of the four-story section of Building A, from which asbestos was removed in 2005.

DATE: 25 July 2007

TIME: 1224 hours

PHOTOGRAPHY BY: C. Imbres

CAMERA: HP Photosmart M22



SCENE: View of sample location DB-15, situated along the southern wall on the third story of the four-story section of Building A.

DATE: 25 July 2007

TIME: 1225 hours

PHOTOGRAPHY BY: C. Imbres

CAMERA: HP Photosmart M22

PHOTOGRAPHY LOG SHEET
Factory H Site • Meriden, Connecticut



SCENE: View of a hole in the floor on the fourth story of the four-story section of Building A (view through the ceiling of the third story).

DATE: 25 July 2007

PHOTOGRAPHY BY: C. Imbres

TIME: 1225 hours

CAMERA: HP Photosmart M22



SCENE: View of paint peeling from the ceiling on the third story of the four-story section of Building A.

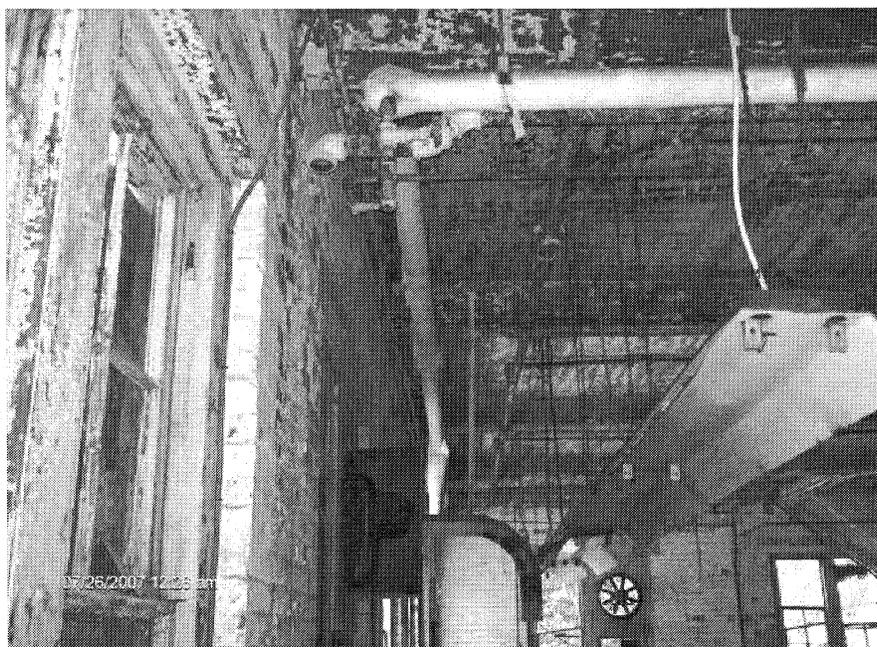
DATE: 25 July 2007

PHOTOGRAPHY BY: C. Imbres

TIME: 1225 hours

CAMERA: HP Photosmart M22

PHOTOGRAPHY LOG SHEET
Factory H Site • Meriden, Connecticut



SCENE: View of pipes along the northern wall of the third story of the four-story section of Building A. Samples ACM-17 and ACM-18 were collected from insulation fallen from the pipes shown.

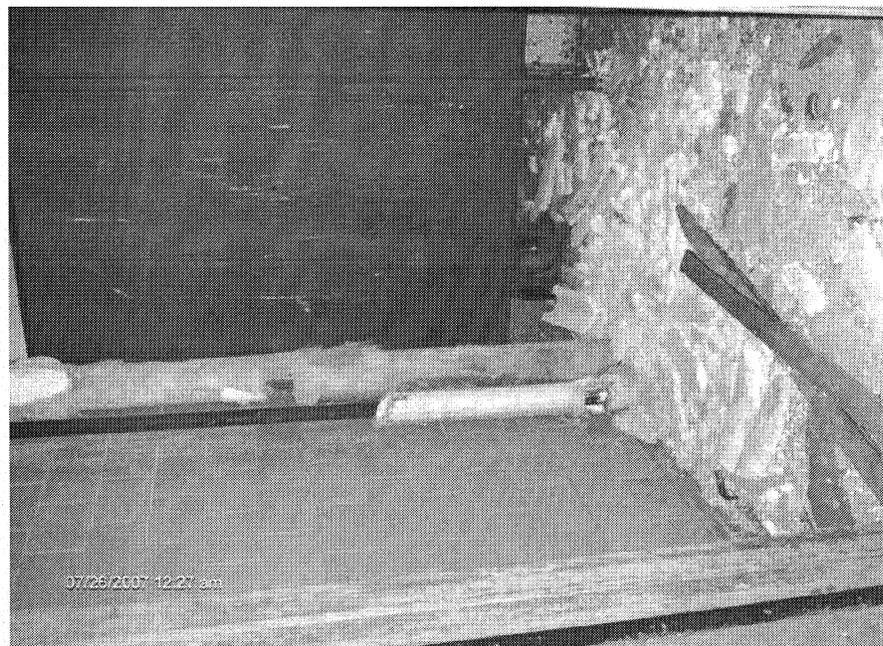
DATE: 25 July 2007

TIME: 1226 hours

PHOTOGRAPHY BY: C. Imbres

CAMERA: HP Photosmart M22

TOP



SCENE: View of pipes and fallen pipe insulation located on the second story of the four-story section of Building A.

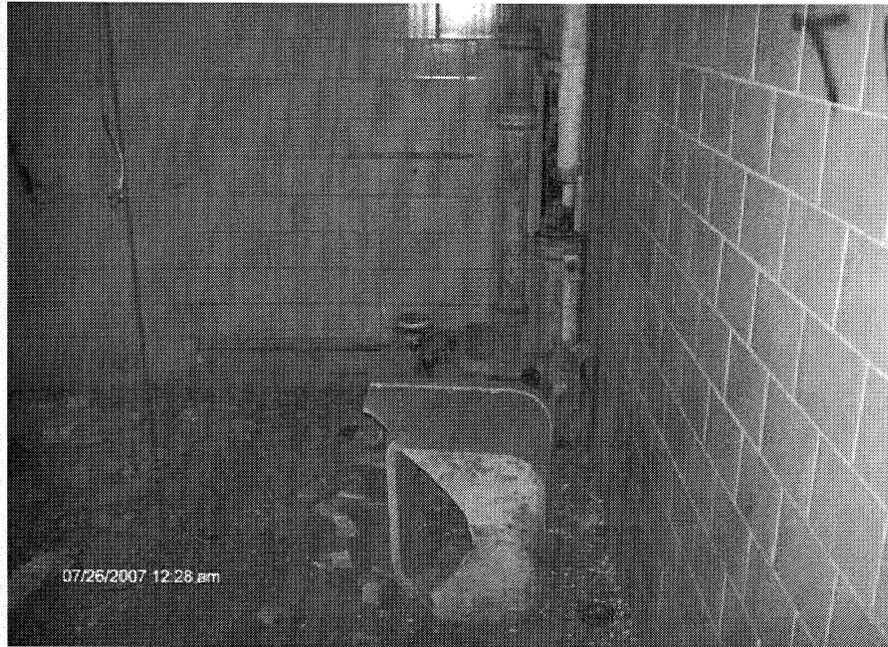
DATE: 25 July 2007

TIME: 1227 hours

PHOTOGRAPHY BY: C. Imbres

CAMERA: HP Photosmart M22

PHOTOGRAPHY LOG SHEET
Factory H Site • Meriden, Connecticut



SCENE: View of pipe and debris located on the second story of the four-story section of Building A.

DATE: 25 July 2007

PHOTOGRAPHY BY: C. Imbres

TIME: 1228 hours

CAMERA: HP Photosmart M22



SCENE: View of sample locations ACM-14 (collected from a piece of wall insulation) and DB-13 (collected from building debris), situated in the center of the floor on the second story of the four-story section of Building A.

DATE: 25 July 2007

PHOTOGRAPHY BY: C. Imbres

TIME: 1233 hours

CAMERA: HP Photosmart M22

PHOTOGRAPHY LOG SHEET
Factory H Site • Meriden, Connecticut



SCENE: View of building debris and insulation on the second story of the four-story section of Building A.

DATE: 25 July 2007

TIME: 1233 hours

PHOTOGRAPHY BY: C. Imbres

CAMERA: HP Photosmart M22

Note: Time stamp incorrect on all photographs.

Appendix D

Chain-of-Custody Records

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PN: 07070051

Sampler Signature *C. Imbros*
 Weston Solutions, Inc. START
 3 Riverside Drive, Andover MA 01810
 EPA Contract Number: EP-W-05-042

CHAIN OF CUSTODY RECORD
 Site #: 0313
 Contact Name: Carolyn Imbros
 Contact Phone: 978-621-1205

No: 0313-07/26/07-0002
 Date Shipped: 7/26/2007
 Lab: OEME
 Lab Phone: 617-918-8300

Lab #	Sample #	Location	Analyses	Matrix	Collected	Sample Time	Numb Cont.	Container	Preservative	MS/MSD
	0313-0007	ACM-01	Asbestos	Asbestos	7/25/2007	10:45	1	8x8 poly bag	4C	N
	0313-0008	ACM-02	Asbestos	Asbestos	7/25/2007	10:35	1	8x8 poly bag	4C	N
	0313-0009	ACM-03	Asbestos	Asbestos	7/25/2007	10:25	1	8x8 poly bag	4C	N
	0313-0010	ACM-04	Asbestos	Asbestos	7/25/2007	10:20	1	8x8 poly bag	4C	N
	0313-0011	ACM-05	Asbestos	Asbestos	7/25/2007	10:10	1	8x8 poly bag	4C	N
	0313-0012	ACM-06	Asbestos	Asbestos	7/25/2007	10:03	1	8x8 poly bag	4C	N
	0313-0013	ACM-07	Asbestos	Asbestos	7/25/2007	10:22	1	8x8 poly bag	4C	N
	0313-0014	ACM-08	Asbestos	Asbestos	7/25/2007	10:30	1	8x8 poly bag	4C	N
	0313-0015	ACM-09	Asbestos	Asbestos	7/25/2007	10:40	1	8x8 poly bag	4C	N
	0313-0016	ACM-10	Asbestos	Asbestos	7/25/2007	09:55	1	8x8 poly bag	4C	N
	0313-0017	ACM-11	Asbestos	Asbestos	7/25/2007	10:00	1	8x8 poly bag	4C	N
	0313-0018	ACM-12	Asbestos	Asbestos	7/25/2007	11:50	1	8x8 poly bag	4C	N
	0313-0019	ACM-13	Asbestos	Asbestos	7/25/2007	12:02	1	8x8 poly bag	4C	N
	0313-0020	ACM-14	Asbestos	Asbestos	7/25/2007	12:06	1	8x8 poly bag	4C	N
	0313-0021	ACM-15	Asbestos	Asbestos	7/25/2007	12:10	1	8x8 poly bag	4C	N
	0313-0022	ACM-16	Asbestos	Asbestos	7/25/2007	12:14	1	8x8 poly bag	4C	N
	0313-0023	ACM-17	Asbestos	Asbestos	7/25/2007	12:13	1	8x8 poly bag	4C	N
	0313-0024	ACM-18	Asbestos	Asbestos	7/25/2007	12:15	1	8x8 poly bag	4C	N
	0313-0025	ACM-19	Asbestos	Asbestos	7/25/2007	12:18	1	8x8 poly bag	4C	N

SAMPLES TRANSFERRED FROM
 CHAIN OF CUSTODY #

Special Instructions: Please fax results to OSC Tom Hatzopoulos at (617) 918-0284. Please run debris samples for Metals by XRF. Run 20% of debris samples, (4 samples as indicated) for Metals (CP).

Items/Reason	Relinquished by	Date	Received by	Date	Time	Items/Reason	Relinquished By	Date	Received by	Date	Time
Sample Analysis for Asbestos	C. Imbros	7/26/07	<i>Chris Cah</i>	7/26/07	12:58	Asbestos	<i>Chris Cah</i>	7/26/07	<i>Chris Cah</i>	7/26/07	15:28



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

CONTAINS ENFORCEMENT-SENSITIVE INFORMATION

MEMORANDUM

DATE: August 28, 2007

SUBJ: Request for a Removal Action at the Factory H Site,
Meriden, Connecticut - **Action Memorandum**

FROM: Athanasios Hatzopoulos, On-Scene Coordinator (OSC)
Emergency Response and Removal Section II

THRU: Steven R. Novick, Chief
Emergency Response and Removal Section II

Arthur V. Johnson, III, Branch Chief
Emergency Planning & Response Branch

TO: James T. Owens, III, Director
Office of Site Remediation and Restoration

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed removal action at the Factory H Site, (the Site), which is located at 77 Cooper Street, Meriden, New Haven County, Connecticut. Hazardous substances, primarily, friable asbestos and asbestos-containing material (ACM) present through out the Site, if not addressed by implementing the response actions selected in this Action Memorandum, will continue to pose a threat to human health. There has been no use of the OSC's \$200,000 warrant authority.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID# : CTN000105724
SITE ID# : 01EE
CATEGORY : Time Critical

A. Site Description

1. Removal site evaluation

Due to the Site conditions and potential threat of release of the hazardous materials from the Site, on April 19, 2007, the EPA Brownfields Program referred the site to the Emergency Planning and Response Branch (EPRB) for further investigation.

On July 12, 2007, EPA OSCs, Athanasios Hatzopoulos and Wing Chau, conducted a reconnaissance to identify any remaining issues, and determine if the Site still met the EPRB's removal action criteria. Present were Philip T. Ashton from the City of Meriden (the City), and John L. Albrecht from Metcalf & Eddy, engineering consultants for the City. During the reconnaissance, both OSCs noted the following: widespread possible asbestos contamination; evidence of trespassers despite the building being locked; high potential for a fire due to the excessive wood debris and the fact that the building lacks fire protection. After the Site visit, both OSCs decided that the Site conditions warrant a further investigation, to be taken as soon as possible.

On July 13, 2007, the City of Meriden formally requested EPA to have the EPRB conduct a removal action due to the concerns listed above.

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 concentrations of hazardous substances detected at the Site are above the Connecticut Department of Environmental Protection's (CTDEP) Remediation Standards.

The asbestos on the floors is a result of pipe insulation that has disintegrated and has come apart from the former overhead water and heat piping systems. The lead contamination is a result of the paint that has flaked from the walls and ceilings. The results of the PA/SI are documented in the report entitled Removal Program Preliminary Assessment/Site Investigation for the Factory H Site, Meriden, CT., submitted by Weston Solutions, Inc. Region I Superfund Technical Assessment and Response Team III August 2007.

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.

2. Physical location

The Factory H Site is located at 77 Cooper Street, Meriden, CT, (Longitude 72° 48' 25.3"W, Latitude 41° 32' 2.9"N). The Site is more fully described as Map, Block and Lot# 01100049-0035-0037 in the Meriden Tax Assessor's Office. The Site is connected to the vacant Veterans Medical Center building, and is bordered by a restaurant, Harbor Towers and the Hanover Towers apartments to the north, Cooper Street to the south, Harbor Brook, residences and Cherry Street to the east, and residences and Cook Avenue to the west.

3. Site characteristics

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.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

Hazardous substances at the Site include, but are not limited to, friable asbestos commingled with lead paint chips. The areas that were sampled are exposed to the elements. These hazardous substances are a health threat to anyone walking on, traveling by or living near the Site. Because the portions of the roof and most of the windows are missing, the threat of release of the friable asbestos to adjacent areas and other receptors exists, particularly during adverse weather conditions. In addition, the buildings are abandoned and lack functioning fire suppression equipment. In the event of a fire, the above mentioned hazardous substance will become airborne and migrate to the surrounding areas.

The Site currently has a fence around its perimeter. However, City officials have stated that it is being accessed by unauthorized individuals.

5. NPL status

The site is not currently on the National Priorities List, and has not received a Hazardous Ranking System rating.

B. Other Actions to Date

EPA has not conducted previous removal actions at the Site. However, the EPA's EPRB and Brownfields programs had conducted investigations in 1997 and 1999. EPRB conducted a PA/SI in 1997 and the Brownfields program conducted a Targeted Site Assessment Final Report in September 1999.

The EPRB in a March 6, 1998, Closure Memorandum, determined that a removal action was warranted at the Site. However, EPA did not commit federal dollars to address the Site because the CTDEP had access to a trust fund in excess of \$1,000,000 from a resolution of a Civil Action against the potentially responsible party (PRP) in 1992. In 2004, the CTDEP exhausted the trust fund to address conditions at the Site. Site conditions were such that the funds in the trust fund were not sufficient to remediate the Site in its entirety.

C. State and Local Authorities' Roles

1. State and local actions to date

In 2004, Advanced Environmental Interface (AEI) personnel and their contractor, Fleet Environmental, conducted various removal activities at the original site on behalf of MidState Medical Center under the guidance of CTDEP. Funding for their cleanup operations resulted

from a trust fund set up by the PRP, following a lawsuit filed against the PRP by the CTDEP. The following potential sources of contamination were removed: all suspected asbestos-containing material (ACM) that had fallen or appeared at risk of falling inside Building C (boiler house), Building B (transformer house), and a section of the second story of Building A (Building A is a two story section of the Factory H building and comprises about 10% of the Factory H Site); all ACM present on the grounds surrounding the on-site buildings; all aboveground and underground storage tanks; one 10,000-gallon wastewater underground storage tank; and 1,400 tons of soil.

Other investigation studies conducted but not limited to are:

GZA GeoEnvironmental, Inc., Supplemental Phase II, Environmental Site Evaluation, International Silver Company, Factory H Site, Meriden, Connecticut, June 2000.

Subsurface Information Surveys, Ground Penetrating Radar Survey Results for the Investigation for the Location of: Underground Storage tanks & Utilities at 77 Cooper St., Meriden, CT, July 2005.

AEI Removal Stabilization Activities Summary Report, Former International Silver Company/Insilco Factory H site, Meriden, CT, February 2006.

2. Potential for continued State/local response

CTDEP will continue to be involved with the Site.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Although the asbestos has been removed from the second floor of Building A, the remaining sections of Factory H Site, either contain, or are contaminated with friable asbestos. The second floor of Building A comprises approximately 5% of the 76,000 ft² of the entire Building A foot print. The remaining asbestos in the building is on the floors, hanging from the overhead piping system throughout the building, and/or is still loosely wrapped around the piping system. The asbestos on the floors is commingled with floor debris. Lead containing paint chips are also on the floors commingled with asbestos and floor debris.

The presence of friable asbestos in the building constitutes a potential threat to public health. Currently there is a high potential for release of asbestos fibers by air suspension, especially during dry periods. There are private residences approximately 50 feet from the Site. Portions of the roof and most of the glass windows are either missing or broken from vandalism activities.

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.

Exposure to cycles of wetting and drying will hasten degradation, and thereby the potential to become airborne exists. Asbestos fibers may enter the body by inhalation or ingestion. In addition, because the buildings are abandoned and lack functioning fire suppression equipment, in case of a fire, the above mentioned hazardous substance will become airborne and migrate to the surrounding areas.

At this time, neither the state or local authorities have the resources to address the contamination at the Site.

A. Threats to Public Health or Welfare

Based on Site conditions and information available on the hazardous substances present, the Site poses the following threats to public health, welfare, or the environment:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [§300.415(b)(2)(i)] People are walking by and through the Site on a daily basis. In addition, people work and live adjacent to the Site. There is also evidence of trespassing such as the graffiti on the inside and outside walls of the buildings. The Site is located in downtown Meriden. Meriden's 2000 population was 59,479. The Site is bounded by two apartment complexes and residential homes.

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)] As indicated above, wind can cause friable asbestos to migrate to the surrounding community.

Threat of fire or explosion [§300.415(b)(2)(vi)] The buildings are abandoned and lack functioning fire suppression equipment. In case of a fire, friable asbestos will become airborne and migrate to the surrounding areas.

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)] CTDEP has indicated that due to other program priorities and staffing limitations, they do not have the resources currently available to address the Site.

IV. ENDANGERMENT DETERMINATION

ASBESTOS- Studies in humans and animals indicate that inhalation of asbestos fibers may lead to fibrotic lung disease (asbestosis). Exposure to high levels of asbestos has caused workers who breathed in asbestos to develop a slow buildup of scar-like tissue in the lungs and in the membrane that surrounds the lungs. This scar-like tissue does not expand and contract like

normal tissue and so breathing becomes difficult. Blood flow to the lungs may also be decreased and this causes the heart to enlarge. Several government offices and regulatory agencies have considered all of the evidence regarding the carcinogenicity of asbestos. The Department of Health and Human Services (DHHS), EPA, and the International Agency for Research on Cancer (IARC) have determined that asbestos is carcinogenic to humans.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The actions required to mitigate the threats outlined herein, are given below. At this time, indications are that the PRP will not perform this work. The proposed actions will protect public health, welfare and the environment.

- 1) Conduct Site walk with Emergency Rapid Response contractor (ERRS).
- 2) The Site will be secured to prevent unauthorized access. Site security will be provided during non-working hours to ensure adequate Site surveillance until the waste is transported off site. Should an extended period of storage be required, some other means of securing the Site may be implemented.
- 3) Evaluate the structural integrity of the floors to determine their stability and potential for collapse.
- 4) Stabilize the floors areas that are structurally unsafe to enable contractor personnel to conduct the removal action. If the need arises, dismantle the unstable floors to permit access to asbestos, and ACM/lead commingled debris.
- 5) Conduct the removal and disposal of asbestos, ACM and ACM with lead commingled debris. The process shall include provisions for on site decontamination of larger debris, and segregation of asbestos-free debris from inside the building. Asbestos material and asbestos/lead contaminated waste will be documented, and shipped off site for disposal at EPA-approved facilities. All wastes will be staged in a secure area on-site while awaiting shipment to CERCLA compliant off-site disposal facilities.

Depending on anticipated storage duration prior to shipment for ultimate disposal, the OSC will determine whether waste will be staged on-Site or shipped to a properly permitted temporary storage facility. Waste staging options will be evaluated based on cost.

Where practicable, final disposal of waste from the Site will utilize an alternative technology to landfilling. The specific treatment and disposal technology will depend on factors such as the quantity and hazardous characteristics, as well as the availability of alternate technologies.

2. Community relations

As noted previously, the Site is located in downtown Meriden, CT and is surrounded by numerous residential homes, as well as two apartment complexes that are utilized by the elderly. Upon approval of the Action Memorandum, the OSC will coordinate with the EPA Community Involvement Office to disseminate information regarding the project to the impacted residents. Initiate and maintain an EPA OSC web site on the progress of the Removal Action. EPA will continue to work closely with the City, and state officials as the project progresses.

3. Contribution to remedial performance

The cleanup proposed in this Action Memorandum is designed to mitigate the threats to human health and the environment posed by the Site. The actions taken at the Site would be consistent with and will not impede any future responses.

4. Description of alternative technologies

The use of alternative technologies with regard to disposal options will be further examined as the site work progresses. On-site field screening and analytical techniques may be utilized during the removal action.

5. Applicable or relevant and appropriate requirements (ARARs)

Federal ARARs will be met to the extent practicable considering the exigencies of the situation. The OSC will coordinate with State officials to identify State ARARs, if any, and will meet, to the extent practicable, each ARAR identified in a timely manner.

6. Project schedule

Duration of the removal action activities shall be 8 months from the day of its commencement.

B. Estimated Costs

COST CATEGORY		CEILING
REGIONAL REMOVAL ALLOWANCE COSTS:		
ERRS Contractor		\$600,000.00
OTHER EXTRAMURAL COSTS NOT FUNDED FROM THE REGIONAL ALLOWANCE:		
START Contractor		\$ 100,000.00
Extramural Subtotal		\$700,000.00
Extramural Contingency	10%	\$ 70,000.00
TOTAL, REMOVAL ACTION CEILING		\$770,000.00

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

A delayed removal action or the absence of a removal action described herein will cause conditions at the Site to remain unaddressed, and threats associated with the presence of hazardous substances will continue to pose a threat to human health and the environment.

VII. OUTSTANDING POLICY ISSUES

There are no precedent setting policy issues associated with this site.

VIII. ENFORCEMENT ... For Internal Distribution Only

See attached Enforcement Strategy.

The total EPA costs for this removal action based on full-time accounting practices that will be eligible for cost recovery are estimated to be \$770,000 (extramural costs) + \$75,000 (EPA intramural costs) = \$845,000 X 1.3151 (regional indirect rate) = \$1,111,259¹.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Factory H Site in Meriden, CT, developed in accordance with CERCLA, as amended, and not inconsistent with the National

¹Direct Costs include direct extramural costs \$770,000 and direct intramural costs \$75,000. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site specific costs [31.51% x \$845,000], consistent with the full accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

Contingency Plan. The basis for this decision will be documented in the administrative record to be established for the Site.

Conditions as the Site meet the NCP Section 300.415 (b) (2) criteria for a removal action due to the following:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [§300.415(b)(2)(i);

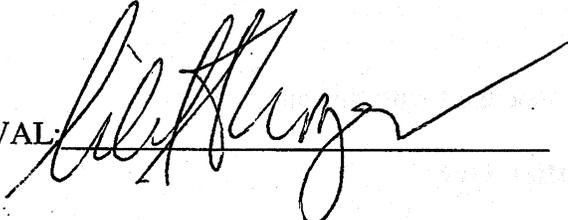
Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)];

Threat of fire or explosion [§300.415(b)(2)(vi);

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)].

I recommend that you approve the proposed removal action. The total removal action project ceiling if approved will be \$770,000. Of this total, no more than \$670,000 comes from the Regional removal allowance.

APPROVAL: _____



DATE: _____

9-25-07

DISAPPROVAL: _____

DATE: _____



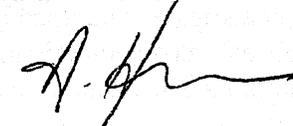
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

CONTAINS ENFORCEMENT-SENSITIVE INFORMATION

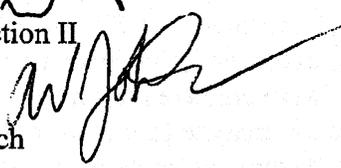
MEMORANDUM

DATE: January 22, 2008

SUBJ: Request of Ceiling Increase of Funds to Continue the Removal Action and Expand the Scope of Response at the Factory H Site, Meriden, Connecticut - **Action Memorandum Addendum**

FROM: Athanasios Hatzopoulos, On-Scene Coordinator (OSC) 
Emergency Response and Removal Section II

THRU: Steven R. Novick, Chief 
Emergency Response and Removal Section II

Arthur V. Johnson, III, Branch Chief 
Emergency Planning & Response Branch

TO: James T. Owens, III, Director
Office of Site Remediation and Restoration

I. PURPOSE

The purpose of this Action Memorandum Addendum is to request and document approval of a change in the scope of response and a ceiling increase at the Factory H Site, (the Site), located at 77 Cooper Street, Meriden, New Haven County, Connecticut.

During the current asbestos removal activities at the Site, a greater volume of friable asbestos and ACM was encountered and required removal. In addition, two sub-grade utility passageways were discovered after piles of debris were removed from previously inaccessible areas. They contain friable asbestos pipe wrap, and asbestos containing material (ACM). The change of scope is the inclusion of the passageways to the Site. Friable asbestos and ACM present throughout the Site, if not addressed by implementing the response actions selected in this Action Memorandum, will continue to pose a threat to human health.

There has been no use of the OSC's \$200,000 warrant authority.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID# : CTN000105724
SITE ID# : 01EE
CATEGORY : Time Critical

A. Site Description

1. **Background and removal action activities to date** (For additional Site information, see initial August 28, 2007, Action Memorandum)

During a Site reconnaissance conducted by EPA on July 12, 2007, the following were noted: widespread possible asbestos contamination; evidence of trespassers despite the building being locked; high potential for a fire due to the excessive wood debris and lack of fire protection.

EPA and its Superfund Technical Assessment and Response Team (START), Weston Solutions, Inc., conducted a Preliminary Assessment and Site Investigation (PA/SI) on July 25, 2007. The PA/SI included sampling floor debris and pipe insulation material from areas that could be safely accessed. 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. The samples analyzed for lead, revealed lead levels ranging from 450 mg/Kg to 6,600 mg/Kg.

Based upon the PA/SI findings, the site investigation was concluded and a time-critical removal action was recommended through a site closure memorandum dated August 27, 2007. The time critical removal action memorandum was signed by the director of the EPA Office of Site Remediation and Restoration on September 25, 2007.

The ongoing removal action was initiated on September 28, 2007. Between November 5, 2007 and January 21, 2008, various removal activities have been conducted by the EPA's Emergency Rapid Response (ERRS) contractor, Shaw Environmental, and its subcontractor, Fleet Environmental. Site set-up activities included clearing vegetation from work zones, constructing a roll-off containment area, and preparing interior work areas by securing all openings with sheets of polyethylene. Removal activities have included the removal of all bulk asbestos and ACM from the 4-story section of the building. This work included removing asbestos pipe wrap, asbestos-containing floor tile, and removing fibrous material not able to be decontaminated via power washing. In many areas, damaged floors were repaired in order to gain access to the ACM and piping systems. Following the removal, floor surfaces were HEPA vacuumed, work areas were visually inspected.

Removal activities conducted on the first floor of the building included the sorting and stacking of the debris left over from former manufacturing activities, and the crushing, wrapping, and load-out of all asbestos-contaminated fibrous debris as ACM.

To date, a total of 1,740 cubic yards of ACM and 100 cubic yards of bulk asbestos have been disposed at off-site landfills. In addition, approximately 1,600 30-gallon bags of asbestos have been generated and are currently being staged on site, ready for disposal.

The Site is currently being monitored by manned security during non-working hours.

2. Removal action evaluation to expand the scope of work and increase the ceiling

During the current asbestos removal activities at the Site, a greater volume of friable asbestos and ACM was encountered and required removal. In addition, two sub-grade utility passageways were discovered after piles of debris were removed from previously inaccessible areas. They are located under the main factory section of the building and they contain several hundred linear feet of friable asbestos pipe wrap and ACM debris. Both of these passageways have sizeable ceiling openings which allow the asbestos fibers to migrate to the rest of the building and to the outside environment.

One of the passageways is covered by approximately two feet of water. This water appears to contain asbestos resulted from years of precipitation that has accumulated from the missing portions of the roof. This water must be pumped and filtered for discharge prior to any asbestos removal work. The second passageway contains a dirt floor that has been contaminated with asbestos that has deteriorated and fallen from overhead pipes. The surface of this soil must be removed by hand or by HEPA vacuum to retrieve the asbestos.

3. Physical location and Site characteristics

The Factory H Site is located at 77 Cooper Street, Meriden, CT, (Longitude 72° 48' 25.3"W, Latitude 41° 32' 2.9"N). The Site is more fully described as Map, Block and Lot# 01100049-0035-0037 in the Meriden Tax Assessor's Office. The Site is connected to the vacant Veterans Medical Center building, and is bordered by a restaurant, Harbor Towers and the Hanover Towers apartments to the north, Cooper Street to the south, Harbor Brook, residences and Cherry Street to the east, and residences and Cook Avenue to the west.

The 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. 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 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, which contain the two basements discovered

during the ongoing removal action. 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. 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.

According to the EPA Region 1 Environmental Justice Mapping Tool, the Site is in an environmental justice area.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

Hazardous substances at the Site include, but are not limited to, friable asbestos commingled with lead paint chips. Although the ongoing removal action has resulted in the removal of 1840 cubic yards of asbestos and ACM, friable asbestos and ACM remain in those areas not yet addressed, i.e. the recently discovered sub-grade utility passageways and the first floor of the building. Both of these passageways have sizeable ceiling openings which allow the asbestos fibers to migrate to the rest of the building and to the outside environment.

These areas continue to be exposed to the elements, and are a health threat to anyone traveling by or living near the Site. If these substances are not addressed by implementing the response actions selected in this Action Memorandum Addendum, they will continue to pose a threat to human health.

5. NPL status

The site is not currently on the National Priorities List, and has not received a Hazardous Ranking System rating.

B. Other Actions to Date

EPA has not conducted previous removal actions at the Site. However, the EPA's Emergency Planning and Response Branch (EPRB) and Brownfields program had conducted investigations in 1997 and 1999. The EPRB conducted a PA/SI in 1997 and the Brownfields program conducted a Targeted Site Assessment in September 1999.

The EPRB in a Closure Memorandum dated March 6, 1998, determined that a removal action was warranted at the Site. However, EPA did not commit federal dollars to address the Site because the CTDEP had access to a trust fund in excess of \$1,000,000 from the resolution of a Civil Action against the potentially responsible party (PRP) in 1992. In 2004, the CTDEP exhausted the trust fund while addressing conditions at the Site. Because of the severity of Site conditions, the funding from the trust fund was not sufficient to remediate the Site in its entirety.

C. State and Local Authorities' Roles

1. State and local actions to date

In 2004, Advanced Environmental Interface (AEI) personnel and their contractor, Fleet Environmental, conducted various removal activities at the original site on behalf of MidState Medical Center under the oversight of CTDEP. Funding for their cleanup operations resulted from a trust fund mentioned previously. The following sources of contamination were removed: all suspected asbestos-containing material (ACM) that had fallen or appeared at risk of falling inside Building C (boiler house), Building B (transformer house), and a section of the second story of Building A (Building A is a two story section of the Factory H building and comprises about 10% of the Factory H Site); all ACM present on the grounds surrounding the on-site buildings; all aboveground and underground storage tanks; one 10,000-gallon wastewater underground storage tank; and 1,400 tons of soil.

Other investigation studies conducted but not limited to, are:

GZA GeoEnvironmental, Inc., Supplemental Phase II, Environmental Site Evaluation, International Silver Company, Factory H Site, Meriden, Connecticut, June 2000.

Subsurface Information Surveys, Ground Penetrating Radar Survey Results for the Investigation for the Location of: Underground Storage tanks & Utilities at 77 Cooper St., Meriden, CT, July 2005.

AEI Removal Stabilization Activities Summary Report, Former International Silver Company/Insilco Factory H site, Meriden, CT, February 2006.

2. Potential for continued State/local response

CTDEP will continue to be involved with the Site by providing technical assistance.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

As previously mentioned, the ongoing removal action has resulted in the removal of 1840 cubic yards of asbestos and ACM. Friable asbestos and ACM remain in those areas not yet addressed, i.e. the recently discovered sub-grade utility passageways and the first floor of the building. As stated earlier, both of these passageways have sizeable ceiling openings which allow the asbestos fibers to migrate to the rest of the building and to the outside environment. These areas continue to be exposed to the elements, and are a health threat to anyone traveling by or living near the Site. There are private residences approximately 50 feet from the Site.

A. Threats to Public Health or Welfare

Based on Site conditions and information available on the hazardous substances present, the Site poses the following threats to public health, welfare, or the environment:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [§300.415(b)(2)(i)] People are walking by the Site on a daily basis. In addition, people work and live adjacent to the Site. The Site is located in downtown Meriden. Meriden's 2000 population was 59,479. The Site is bounded by two apartment complexes and residential homes.

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)] Wind can cause friable asbestos to migrate to the surrounding community.

Threat of fire or explosion [§300.415(b)(2)(vi)] The building lacks functioning fire suppression equipment. In case of a fire, friable asbestos will become airborne and migrate to the surrounding areas.

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)] CTDEP has indicated that due to other program priorities and staffing limitations, they do not have the resources currently available to address the Site.

IV. ENDANGERMENT DETERMINATION

ASBESTOS- Studies in humans and animals indicate that inhalation of asbestos fibers may lead to fibrotic lung disease (asbestosis). Exposure to high levels of asbestos has caused workers who breathed in asbestos to develop a slow buildup of scar-like tissue in the lungs and in the membrane that surrounds the lungs. This scar-like tissue does not expand and contract like normal tissue and so breathing becomes difficult. Blood flow to the lungs may also be decreased and this causes the heart to enlarge. Several government offices and regulatory agencies have considered all of the evidence regarding the carcinogenicity of asbestos. The Department of Health and Human Services (DHHS), EPA, and the International Agency for Research on Cancer (IARC) have determined that asbestos is carcinogenic to humans.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

1) Continue the ongoing removal action and include removal activities to collect and dispose the asbestos and ACM from the passageways and the first floor. Remove (pump/treat/discharge) any

standing water from the passageways prior to any asbestos removal work. Following the removal, the floor surfaces will be HEPA vacuumed and visually inspected.

- 2) Continue to secure the Site to prevent unauthorized access. Site security will be provided during non-working hours to ensure adequate Site surveillance until the waste is transported off site. Should an extended period of storage be required, some other means of securing the Site may be implemented.
- 3) Continue to evaluate the structural integrity of the floors to determine their stability and potential for collapse to ensure safe conditions for response personnel.
- 4) Stabilize any remaining floors areas that are structurally unsafe to enable contractor personnel to conduct the removal action. If the need arises, dismantle the unstable floors to permit access to asbestos, and ACM/lead commingled debris.
- 5) Asbestos material and asbestos/lead contaminated waste will be documented, and shipped off site for disposal at EPA-approved facilities. All wastes will be staged in a secure area on-site while awaiting shipment to CERCLA compliant off-site disposal facilities.

Depending on anticipated storage duration prior to shipment for ultimate disposal, the OSC will determine whether waste will be staged on-Site or shipped to a properly permitted temporary storage facility. Waste staging options will be evaluated based on cost.

2. Community relations

As noted previously, the Site is located in downtown Meriden, CT and is surrounded by numerous residential homes, as well as two apartment complexes that are utilized by the elderly. Upon approval of the Action Memorandum Addendum, the OSC will continue coordination with the EPA Community Involvement Office to disseminate information regarding the project to the City and the impacted residents.

To date, EPA has on several occasions, met with City officials and presented updates of the removal activities at the Site. In addition, EPA informed the City that under congressional mandate, the EPA has jurisdiction to address only those issues on asbestos-contaminated sites that pose a direct and immediate threat to human health and/or the environment, and under no circumstance can EPA certify a building as asbestos-free.

3. Contribution to remedial performance

The cleanup proposed in this Action Memorandum is designed to mitigate the threats to human health and the environment posed by the Site. The actions taken at the Site would be consistent with and will not impede any future responses.

4. Description of alternative technologies

The use of alternative technologies with regard to disposal options will be further examined as the site work progresses. On-site field screening and analytical techniques may be utilized during the removal action.

5. Applicable or relevant and appropriate requirements (ARARs)

Federal ARARs will be met to the extent practicable considering the exigencies of the situation. The OSC will coordinate with State officials to identify State ARARs, if any, and will meet, to the extent practicable, each ARAR identified in a timely manner.

6. Project schedule

Duration of the removal action activities shall remain 8 months from the day of its original commencement.

B. Estimated Costs

COST CATEGORY	CURRENT CEILING	CEILING INCREASE	PROPOSED CEILING
<i>REGIONAL REMOVAL ALLOWANCE COSTS:</i>			
ERRS Contractor	\$600,000.00	\$450,000.00	\$1,050,000.00
Interagency Agreement	\$0.00	\$0.00	\$0.00
<i>OTHER EXTRAMURAL COSTS NOT FUNDED FROM THE REGIONAL ALLOWANCE:</i>			
START Contractor	\$100,000.00	\$50,000.00	\$150,000.00
Extramural Subtotal	\$700,000.00	\$500,000.00	\$1,200,000.00
Extramural Contingency (10%)	\$70,000.00	\$50,000.00	\$120,000.00
TOTAL, REMOVAL ACTION CEILING	\$770,000.00	\$550,000.00	\$1,320,000.00

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

A delayed removal action or the absence of a removal action described herein will cause conditions at the Site to remain unaddressed, and threats associated with the presence of hazardous substances will continue to pose a threat to human health and the environment.

VII. OUTSTANDING POLICY ISSUES

There are no precedent setting policy issues associated with this site.

VIII. ENFORCEMENT ... For Internal Distribution Only

See attached Enforcement Strategy.

The total EPA costs for this removal action based on full-time accounting practices that will be eligible for cost recovery are estimated to be \$1,320,000 (extramural costs) + \$75,000 (EPA intramural costs) = \$1,395,000 X 1.3151 (regional indirect rate) = \$1,834,564¹.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Factory H Site in Meriden, CT, developed in accordance with CERCLA, as amended, and not inconsistent with the National Contingency Plan. The basis for this decision will be documented in the administrative record to be established for the Site.

Conditions as the Site meet the NCP Section 300.415 (b) (2) criteria for a removal action due to the following:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [§300.415(b)(2)(i)];

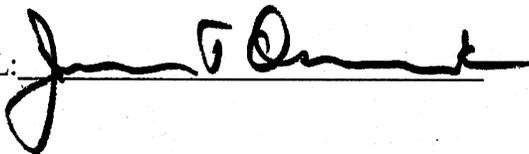
Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)];

Threat of fire or explosion [§300.415(b)(2)(vi)];

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)].

I recommend that you approve the proposed removal action. The total removal action project ceiling if approved will be \$1,320,000. For this Action Memorandum Addendum, no more than \$500,000 comes from the Regional removal allowance.

APPROVAL: _____



DATE: _____

1/31/08

DISAPPROVAL: _____

DATE: _____

¹Direct Costs include direct extramural costs \$1,320,000 and direct intramural costs \$75,000. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site specific costs [31.51% x \$1,395,000], consistent with the full accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

SITE-SPECIFIC DOCUMENTS
ADMINISTRATIVE RECORD FILE INDEX
for the
Factory H Site Removal Action

REMOVAL

Correspondence (Site File 2.01)

1. Letter from Larry Kendzior, City Manager, and Mark D. Benigni, Mayor, City of Meriden, Connecticut, 124 East Main Street, City Hall, Meriden, CT 06450, to Mr. Robert Varney, Regional Administrator, EPA Region I, Boston, MA, 02114, regarding the Factory H site and requesting that EPA conduct a removal action at the site, dated 13 July 2007.
2. Letter from Mark DeCaprio, MPH, RS, Director, Emergency Response and Spill Prevention, Bureau of Materials Management and Compliance Assurance, Connecticut Department of Environmental Protection, to Mr. Steve Novick, Section Chief, Emergency Response and Removal 1 Section, EPA Region I, regarding Insilco Building, 77 Cooper Street, Meriden, Connecticut, dated 10 August 2007.
3. Memorandum from Athanasios Hatzopoulos, On-Scene Coordinator, Emergency Response and Removal Section II, Emergency Planning and Response Branch (EPRB), Office of Site Remediation and Restoration (OSRR), EPA Region I, through Steven Novick, Chief, Emergency Response and Removal Section II, EPRB, OSRR, EPA Region I, to the Factory H Site File, regarding the Site Investigation Closure at the Factory H Site, Meriden, CT, dated 27 August 2007.

Removal Reports (Site File 2.02)

4. "Removal Program Preliminary Assessment/Site Investigation Report for the Factory H Site, Meriden, New Haven County, Connecticut, 25 July 2007", prepared by Weston Solutions, Inc, Superfund Technical Assessment and Response Team (START), for U.S. Environmental Protection Agency (EPA) Region I, dated November 2007.

Action Memorandum (Site File 2.09)

5. Memorandum from Athanasios Hatzopoulos, On-Scene Coordinator, Emergency Response and Removal Section II, EPA Region I, through Steven R. Novick, Chief, Emergency Response and Removal Section II, EPA Region I, and Arthur V. Johnson III, Branch Chief, Emergency Planning & Response Branch, EPA Region I, to James T. Owens III, Director, Office of Site Remediation and Restoration, EPA Region I, regarding a Request for a Removal Action at the Factory H Site, Meriden, Connecticut, dated 28 August 2007, and signed by Richard Cavagnero for James T. Owens on 25 September 2007. (The Enforcement Section of the Memorandum is withheld as being CONFIDENTIAL.)

6. Memorandum from Athanasios Hatzopoulos, On-Scene Coordinator, Emergency Response and Removal Section II, EPA Region I, through Steven R. Novick, Chief, Emergency Response and Removal Section II, EPA Region I, and Arthur V. Johnson III, Branch Chief, Emergency Planning & Response Branch, EPA Region I, to James T. Owens III, Director, Office of Site Remediation and Restoration, EPA Region I, regarding a Request of Ceiling Increase of Funds to Continue the Removal Action and Expand the Scope of Response at the Factory H Site, Meriden, Connecticut, dated 22 January 2008, and signed on 31 January 2008. (The Enforcement Section of the Memorandum is withheld as being CONFIDENTIAL.)
7. Memorandum from Athanasios Hatzopoulos, On-Scene Coordinator, Emergency Response and Removal Section II, EPA Region I, through Steven R. Novick, Chief, Emergency Response and Removal Section II, EPA Region I, and Arthur V. Johnson III, Branch Chief, Emergency Planning & Response Branch, EPA Region I, to James T. Owens III, Director, Office of Site Remediation and Restoration, EPA Region I, regarding a Request of Ceiling Increase of Funds to Continue the Removal Action at the Factory H Site, Meriden, Connecticut, dated 22 February 2008, and signed by Richard Cavagnero (for James T. Owens) on 27 February 2008. (The Enforcement Section of the Memorandum is withheld as being CONFIDENTIAL.)

COMMUNITY RELATIONS

News Clippings/Press Releases (Site File 13.03)

8. EPA Press Release, "Clean up Begins at "Factory H" Site in Meriden, Conn.," dated 6 November 2007.
9. "Administrative Record File Available for the Factory H Site Removal Action," text of the display announcement as it was requested to appear in the *Record-Journal*, Meriden, Connecticut.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

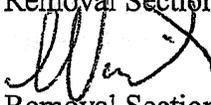
CONTAINS ENFORCEMENT-SENSITIVE INFORMATION

MEMORANDUM

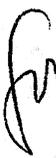
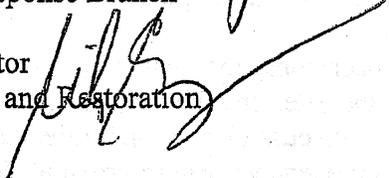
DATE: February 22, 2008

SUBJ: Request of Ceiling Increase of Funds to Continue the Removal Action at the Factory H Site, Meriden, Connecticut - **Action Memorandum**

FROM: Athanasios Hatzopoulos, On-Scene Coordinator (OSC) 
Emergency Response and Removal Section II

THRU: Steven R. Novick, Chief 
Emergency Response and Removal Section II

Arthur V. Johnson, III, Branch Chief 
Emergency Planning & Response Branch

TO:  James T. Owens, III, Director 
Office of Site Remediation and Restoration

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of a ceiling increase for the removal action at the Factory H Site, (the Site), located at 77 Cooper Street, Meriden, New Haven County, Connecticut. During the current removal activities at the Site, greater volumes of friable asbestos and ACM have been encountered. The amounts of friable asbestos and ACM throughout the Site, if not addressed by completing the response actions approved previously in the Action Memorandum Addendum dated January 22, 2008, will continue to pose a threat to human health and the environment.

There has been no use of the OSC's \$200,000 warrant authority.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID#: CTN000105724
SITE ID#: 01EE
CATEGORY: Time Critical

A. Background

Information presented below is new or changed information about the Site. For previously established information about the Site background, removal site evaluations, and state/local authorities' roles, please refer to the initial Action Memorandum dated August 28, 2007, and Action Memorandum Addendum dated January 22, 2008.

B. Current Situation

The ongoing removal action was initiated on September 28, 2007. Between November 5, 2007 and February 22, 2008, EPA and its Emergency Rapid Response (ERRS) contractor, Shaw Environmental, and its subcontractor, Fleet Environmental, completed most of the asbestos removal activities at the Site except the two sub-grade utility passageways that were discovered after piles of debris were removed from previously inaccessible areas.

To date, a total of 2,880 cubic yards of ACM and 200 cubic yards of bulk asbestos have been disposed at off-site landfills. In addition, approximately 60 cubic yards of bulk asbestos and 600 cubic yards of mixed bulk asbestos and lead contaminated materials have been generated and are currently being staged on Site, awaiting off-site disposal.

In addition, EPA has on several occasions, met with City and State officials and presented updates of the removal activities at the Site. In addition, on January 23, 2008, EPA met with the City and State officials at the Site to discuss cleanup activities, as well as appropriate extent of responses authorized by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP, 40 CFR Parts 9 and 300). EPA further explained that under this congressionally mandated statute, the EPA's Removal Program has jurisdiction to address the release or threat of release of hazardous substances, pollutants, or contaminants that pose a direct and immediate threat to human health and/or the environment. Also, EPA noted that after consulting with its state and local stakeholders, it is the Agency that decides the appropriate extent of action to be taken in this time-critical response action.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

As previously mentioned, the ongoing removal action has resulted in the removal of 3,080 cubic yards of asbestos and ACM. Approximately 60 cubic yards of bulk asbestos and 600 cubic yards of mixed bulk asbestos and lead have been generated and are currently being staged on Site for disposal. In addition, friable asbestos and ACM remain in the sub-grade utility passageways. Both passageways have sizeable ceiling openings which allow the asbestos fibers to migrate to the rest of the building and to the outside environment. These areas continue to be exposed to the elements, and are a health threat to anyone traveling by or living near the Site. There are private residences approximately 50 feet from the Site.

A. Threats to Public Health or Welfare

Based on Site conditions and information available on the hazardous substances present, the Site poses the following threats to public health, welfare, or the environment:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [§300.415(b)(2)(i)] People are walking by the Site on a daily basis. In addition, people work and live adjacent to the Site. The Site is located in downtown Meriden. Meriden's 2000 population was 59,479. The Site is bounded by two apartment complexes and residential homes.

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)] Wind can cause friable asbestos to migrate to the surrounding community.

Threat of fire or explosion [§300.415(b)(2)(vi)] The building lacks functioning fire suppression equipment. In case of a fire, friable asbestos will become airborne and migrate to the surrounding areas.

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)] CTDEP has indicated that due to other program priorities and staffing limitations, they do not have the resources currently available to address the Site.

IV. **ENDANGERMENT DETERMINATION**

ASBESTOS- Studies in humans and animals indicate that inhalation of asbestos fibers may lead to fibrotic lung disease (asbestosis). Exposure to high levels of asbestos has caused workers who breathed in asbestos to develop a slow buildup of scar-like tissue in the lungs and in the membrane that surrounds the lungs. This scar-like tissue does not expand and contract like normal tissue and so breathing becomes difficult. Blood flow to the lungs may also be decreased and this causes the heart to enlarge. Several government offices and regulatory agencies have considered all of the evidence regarding the carcinogenicity of asbestos. The Department of Health and Human Services (DHHS), EPA, and the International Agency for Research on Cancer (IARC) have determined that asbestos is carcinogenic to humans.

V. **PROPOSED ACTIONS AND ESTIMATED COSTS**

A. Proposed Actions

1. **Proposed action description**

- 1) Continue the ongoing removal action and include removal activities to collect and dispose the asbestos and ACM from the passageways. Remove (pump/treat/discharge) any standing water

from the passageways prior to any asbestos removal work. Following the removal, the floor surfaces will be HEPA vacuumed if determined to be appropriate and visually inspected.

- 2) Continue to secure the Site to prevent unauthorized access. Site security will be provided during non-working hours to ensure adequate Site surveillance until the waste is transported off site. Should an extended period of storage be required, some other means of securing the Site may be implemented.
- 3) Continue to evaluate the structural integrity of the floors to determine their stability and potential for collapse to ensure safe conditions for response personnel.
- 4) Stabilize any remaining floors areas that are structurally unsafe to enable contractor personnel to conduct the removal action. If the need arises, dismantle the unstable floors to permit access to asbestos, and ACM/lead commingled debris.
- 5) Asbestos material and asbestos/lead contaminated waste will be documented, and shipped off site for disposal at EPA-approved facilities. All wastes will be staged in a secure area on-site while awaiting shipment to CERCLA compliant off-site disposal facilities.

Depending on anticipated storage duration prior to shipment for ultimate disposal, the OSC will determine whether waste will be staged on-Site or shipped to a properly permitted temporary storage facility. Waste staging options will be evaluated based on cost.

2. Community relations

As noted previously, the Site is located in downtown Meriden, CT and is surrounded by numerous residential homes, as well as two apartment complexes that are utilized by the elderly. Upon approval of the Action Memorandum Addendum, the OSC will continue coordination with the EPA Community Involvement Office to disseminate information regarding the project to the City and the impacted residents.

3. Contribution to remedial performance

The cleanup proposed in this Action Memorandum is designed to mitigate the threats to human health and the environment posed by the Site. The actions taken at the Site would be consistent with and will not impede any future responses.

4. Description of alternative technologies

The use of alternative technologies with regard to disposal options will be further examined as the site work progresses. On-site field screening and analytical techniques may be utilized during the removal action.

5. Applicable or relevant and appropriate requirements (ARARs)

Federal ARARs will be met to the extent practicable considering the exigencies of the situation. The OSC will coordinate with State officials to identify State ARARs, if any, and will meet, to the extent practicable, each ARAR identified in a timely manner.

6. Project schedule

Duration of the removal action activities shall remain 8 months from the day of its original commencement.

B. Estimated Costs

COST CATEGORY	CURRENT CEILING	CEILING INCREASE	PROPOSED CEILING
<i>REGIONAL REMOVAL ALLOWANCE COSTS:</i>			
ERRS Contractor	\$1,050,000.00	\$250,000.00	\$1,300,000.00
Interagency Agreement	\$0.00	\$0.00	\$0.00
<i>OTHER EXTRAMURAL COSTS NOT FUNDED FROM THE REGIONAL ALLOWANCE:</i>			
START Contractor	\$150,000.00	\$0.00	\$150,000.00
Extramural Subtotal	\$1,200,000.00	\$250,000.00	\$1,450,000.00
Extramural Contingency (10%)	\$120,000.00	\$25,000.00	\$145,000.00
TOTAL, REMOVAL ACTION CEILING	\$1,320,000.00	\$275,000.00	\$1,595,000.00

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

A delayed removal action or the absence of a removal action described herein will cause conditions at the Site to remain unaddressed, and threats associated with the presence of hazardous substances will continue to pose a threat to human health and the environment.

VII. OUTSTANDING POLICY ISSUES

There are no precedent setting policy issues associated with this site.

VIII. ENFORCEMENT ... For Internal Distribution Only

See attached Enforcement Strategy.

The total EPA costs for this removal action based on full-time accounting practices that will be eligible for cost recovery are estimated to be \$1,595,000 (extramural costs) + \$75,000 (EPA intramural costs) = \$1,670,000 X 1.3151 (regional indirect rate) = \$2,196,217¹.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Factory H Site in Meriden, CT, developed in accordance with CERCLA, as amended, and not inconsistent with the National Contingency Plan. The basis for this decision will be documented in the administrative record to be established for the Site.

Conditions as the Site meet the NCP Section 300.415 (b) (2) criteria for a removal action due to the following:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [§300.415(b)(2)(i);

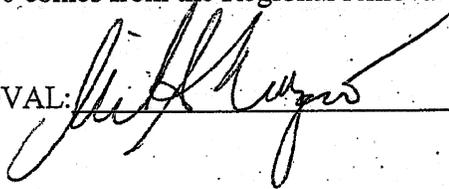
Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)];

Threat of fire or explosion [§300.415(b)(2)(vi);

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)].

I recommend that you approve the proposed removal action. The total removal action project ceiling if approved will be \$1,595,000. For this Action Memorandum Addendum, no more than \$275,000 comes from the Regional removal allowance.

APPROVAL: _____



DATE: _____

2-27-08

DISAPPROVAL: _____

DATE: _____

¹Direct Costs include direct extramural costs \$1,595,000 and direct intramural costs \$75,000. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site specific costs [31.51% x \$1,670,000], consistent with the full accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.



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Clean up Begins at "Factory H" Site in Meriden, Conn.

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Release date: 11/06/2007

Contact Information: David Deegan, (617) 918-1017

(Boston, Mass. – Nov. 6, 2007) – This week, EPA will begin the clean-up of an abandoned and inactive 76,000 sq. foot multi-section building commonly known as the "Factory H Site." The building was once part of the former International Silver Company's 7.2 acre Meriden, Conn. facility, located at 77 Cooper Street. The site is currently owned by the City of Meriden.

Testing conducted at the Factory H building has revealed the presence of friable asbestos and asbestos containing-materials. Because the presence of asbestos at the site could pose a threat to public health, it requires removal and proper disposal.

During the clean up work, EPA will take appropriate health and safety precautions, including performing air monitoring and utilizing dust suppression measures to ensure that cleanup activities do not negatively impact air quality in the surrounding area. On site, workers will be wearing personal protective gear, including impermeable white suits and respirators. This level of protection is required by federal laws.

The planned removal action at the site will be completed in four stages. First, the site will be secured to prevent unauthorized access. Second, the site will be evaluated to determine the structural integrity of the floors and all unsafe areas will be stabilized. Next, EPA contractors will conduct removal of the friable asbestos and asbestos containing-materials. Finally, the hazardous materials will be disposed at EPA-approved disposal facilities.

The work is beginning this week and is expected to take approximately six months to complete.

More information: [EPA information on asbestos \(epa.gov/asbestos/\)](http://epa.gov/asbestos/)

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Last updated on 11/06/2007 03:27:43 PM

URL: http://yosemite.epa.gov/opa/admpress.nsf/names/r01_2007-11-6_factoryh

Administrative Record File Available for the Factory H Site Removal Action

The U.S. Environmental Protection Agency (EPA) announces that the Administrative Record File for the removal action at the Factory H Site located in Meriden, Connecticut is available for review. EPA seeks to inform the public of the availability of the Administrative Record File and to encourage the public to review and comment on it. The EPA Fund-lead removal action includes the following activities: 1) Evaluating the structural integrity of the floors to determine their stability and potential for collapse. 2) Stabilizing the floor areas that are structurally unsafe to enable contractor personnel to conduct the removal action; and if necessary, dismantling the unstable floors to permit access to asbestos, asbestos-containing material (ACM), and ACM/lead-commingled debris. 3) Conducting the removal and disposal of asbestos, ACM, and ACM/lead-commingled debris. 4) Documenting asbestos material and asbestos/lead-contaminated waste and shipping it off site for disposal at EPA-approved facilities.

The Administrative Record File is the collection of documents that formed the basis for the selection of a removal action at the site. Documents in the Administrative Record File include the Action Memorandum and the Site Investigation Closure Memorandum.

The Administrative Record File is available for review at the:

- U.S. EPA Records Center, One Congress Street, Suite 1100, Boston, MA, 02114-2023, (617) 918-1440, by appointment.
- Meriden Public Library, 105 Miller Street, Meriden, CT, 06450, (203) 238-2344.

Written comments on the Administrative Record File should be sent to: On-Scene Coordinator Athanasios Hatzopoulos, Mail Code HBR, U.S. EPA Region I, One Congress Street, Suite 1100, Boston, Massachusetts 02114-2023. Comments should be sent to the On-Scene Coordinator within 30 days of this announcement.