DRAFT

Analysis of Brownfields Cleanup Alternatives

Baltic Mills Site

27 Bushnell Hollow Road Sprague, Connecticut

Prepared for:

Town of Sprague

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	Site 1	Site Location

2 Site Schematic Plan

1. Project Background

1.1 Site Description

The property is located at 29 Bushnell Hollow Road in Sprague, Connecticut and is owned by the Town of Sprague. The Tax Assessor's designation for the site is Map 26, Block 6, Lot 1; and another small parcel is designated Map 26, Block 5, Lot 4. The site location is shown in Figure 1. A schematic plan of the property is included as Figure 2.

The main mill structures were destroyed by fire in August 1999. The remaining on-site building is the "No. 10 Addition" structure constructed circa 1915 on the eastern end of the former mill complex. It is a four-story granite structure approximately 200 feet long by 80 feet wide. The first floor is a concrete slab-on-grade; no basement areas were apparent. The structure is comprised of granite walls and wood and metal support columns/beams. The floors are wood. All wood floors within the structures are unsafe and have significant water damage from the leaking roof. Other than the first floor (concrete) and the stairwells, the building is unsafe and cannot be inspected. Building debris is located on the interior wood floors. The Town of Sprague plans to have the site and building redeveloped by a private developer.

This report is prepared to comply with the United States Environmental Protection Agency (EPA) requirements for the Cleanup Grant received by the Town of Sprague.

1.2 **Previous Reports**

The following reports have been completed for this site.

- Phase I Environmental Site Assessment, GEI Consultants, February 2005
- Draft Targeted Brownfields Assessment, Tetra Tech NUS, August 2006

Both of these reports included asbestos/lead paint surveys of Mill Building 10. The EPA is currently planning an additional Brownfields site characterization assessment to further define the nature and extent of soil and groundwater contamination on the site.

1.3 Project Objectives

The objective of this project is to mitigate the risk associated with asbestos material within and around Building 10. Currently the asbestos materials are exposed to the elements, and some materials are dispersed on the ground around the mill building.

2. Regulatory Summary

The Baltic Mills site is listed on Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) due to the removal assessment and removal action associated with EPA's cleanup activities after the fire. EPA site activities included demolition of the main mill and Baltic Hardware, segregating and stockpiling asbestos-containing material (ACM) and non-ACM debris, removing and disposing ACM, and decontaminating and removal of a 550-gallon aboveground storage tank (AST) that contained petroleum liquids. The site is classified as No Further Response Action Planned (NFRAP) and is listed as "Archived." The site is also included as a state Brownfields site.

The site is listed as a leaking underground storage tank (LUST) site regarding the previous two concrete 50,000-gallon, No. 6 fuel oil tanks. The incident date is listed as January 11, 1989, which is when the tanks and contaminated soil were removed. The status is listed as "completed."

The site has enrolled into the Connecticut Department of Environmental Protection (CTDEP) Voluntary Remediation program under Connecticut General Statutes 22a-133x as of March 2008.

3. Summary of Asbestos and Lead Survey

The window-glazing compound contains chrysotile asbestos. Some of the asbestoscontaining glazing materials have fallen to ground surface below the windows. The same window glazing compound is assumed to be present and commingled with construction debris directly in side the building. The roofing material also contains chrysotile asbestos. There is roofing debris throughout the collapsed area of the roof. It has fallen to the ground surface surrounding the building and on upper interior floor.

The x-ray fluorescence (XRF) results indicated the presence of lead paint on virtually all surfaces that were tested. These surfaces included wood window sashes and frames, wood doors and frames, brick walls and metal doors.

The USEPA, as part of the Targeted Brownfields Assessment, collected a representative building materials sample for lead chemical analysis by toxicity characteristics leaching procedure (TCLP). The result for lead was below detection limit, indicating the building debris can be disposed as construction debris if the structure is demolished in its entirety. The window sash and frame waste stream, when removed from the structure separately due to the presence of asbestos containing window glazing compound in the operable sash would require special disposal.

4. Analysis of Alternatives

4.1 Public Health Threats

Asbestos containing roof materials and window glazing are impacted by weathering processes and are dispersed around the building. This results in a potential human exposure contact with this material. This situation is currently mitigated by fencing along the road.

4.2 Environmental Response Objectives

The response objective is to remove as much asbestos from the building and surrounding exterior area as the budget allows. This will mitigate the human health risks and better prepare the granite structure for redevelopment and reuse.

4.3 Remedial Alternatives

Four remedial alternatives were evaluated as follows:

- Remove the asbestos-containing building materials (ACBM) from the existing structure.
- Remove the ACBM from the structure during renovation/demolition of unsafe building components (roof/floors), and manage the debris as asbestos containing.
- A combination of the above.
- No action.

4.4 Proposed Action

The proposed action is as follows:

- Remove the asbestos-containing window glazing. The Contractor will be given the option of removing the window glazing in place, or removing the widows (leaving frames in place), removing the asbestos glazing, and leaving the removed windows on site for future reuse or disposal with other building demolition materials.
- Roof material will be removed if accessible for the exterior perimeter of the building. The remainder of roof material will be removed during building renovation.
- Depending on bid prices and as the budget allows, the asbestos containing material around the interior perimeter of the building near the window openings will be removed. This will require the placement of temporary planks supported by the

underlying steel floor beams. Any remaining asbestos-containing materials on the interior floors will be managed during floor demolition during renovation.

- The USEPA estimated cost of this project is approximately \$200,000 according to the *Draft Targeted Brownfields Assessment, Tetra Tech NUS, August 2006.* This figure did not include abatement of in-place roof material or interior asbestos containing debris.
- The bid will be structured in such a manner that if the bid price exceeds \$200,000, certain interior debris containing asbestos will remain until building renovation.

Figures

