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June 11, 2020

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Bureau of Materials Management and Compliance Assurance
79 Elm Street
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Sent via Certified Mail Return Receipt: Tracking #70172620000000874596

Subject: Closure Report - Abatement and Demolition of Station B, 510A Grand Ave., New Haven CT
TRC Project No. 263951

Dear Mr. Trombly:

The enclosed Closure Report is being provided on behalf of the United Illuminating Company at the request of the Connecticut Department of Energy and Environmental Protection to document environmental activities performed during abatement of hazardous materials, building demolition and disposal of wastes for Station B performed by ACV. This report is based records gathered and project monitoring performed by TRC to document that work was performed in accordance with approved plans, specifications, permits, approvals, regulations governing asbestos abatement activities and other regulations as applicable. Also, sampling was performed to support waste characterization for the project referenced above.

Sincerely,

TRC Environmental Corporation

Carl N. Stopper, PE
Vice-President

A handwritten signature in blue ink that reads "Carl N. Stopper". The signature is fluid and cursive, with a long horizontal stroke at the end.

Enclosure

cc. Shawn Crosbie, UI w/enclosures



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Shawn Crosbie
Project Manager
UIL Holdings Corporation
180 Marsh Hill Road
Orange Connecticut

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Please contact me at 860-798-4272 if you would like to discuss any aspect of our report.

Sincerely,

TRC

A handwritten signature in blue ink that reads "Carl N. Stopper". The signature is fluid and cursive, with a long horizontal stroke at the end.

Carl N. Stopper, PE
Vice-President

CLOSURE REPORT
STATION B
ABATEMENT AND DEMOLITION PROJECT
510A GRAND AVE
NEW HAVEN, CT

Prepared for:

The United Illuminating Company

180 Marsh Hill Road

Orange, Connecticut

Prepared by:



Windsor, Connecticut

June 11, 2020

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Acronym/Abbreviation List

ACV	ACV Environmental
AEI	Advanced Environmental Interface, Inc.
AHERA	Asbestos Hazard Emergency Response Act
AIHA	American Industrial Hygiene Association
AOC	Area of Concern
ASNAT	ASNAT Realty, LLC
AST	Aboveground storage tank
ASTM	American Society for Testing and Materials
AWP	Alternate Work Practices
CET	Complete Environmental Testing, Inc.
CFC	Chlorofluorocarbon
CHMM	Certified Hazardous Materials Manager
cm	Centimeter
cm/sec	Centimeters per second

CMU	Concrete Masonry Unit (Hollow Concrete Block)
COC	Contaminant of concern
CSM	Conceptual site model
CTDEEP	Connecticut Department of Energy and Environmental Protection
CT DPH	Connecticut Department of Health
ELLAP	Environmental Lead Laboratory Accreditation Program
EPA	Environmental Protection Agency
ETPH	Extractable total petroleum hydrocarbons
ftbgs	Feet below ground surface
GEI	GEI Consultants, Inc.
gr	Gravimetric reduction
HPLC	High performance liquid chromatography
HRP	HRP Associates, Inc.
I/C	Industrial/Commercial
LCS	Laboratory control sample
ID	Identifier
IDW	Investigation-derived waste
LEP	Licensed Environmental Professional
LF	Lineal feet
MDL	Minimum detection limit
mg/cm ²	Milligrams per square centimeter
mg/kg	Milligrams per kilogram
MS	Matrix spike
MSD	Matrix spike duplicate
NAPL	Non-aqueous phase liquids
NESHAP	National Emissions Standard for Hazardous Air Pollutants
NOB	Non-friable organically bound
NTU	Nephelometric turbidity unit
NVLAP	National Voluntary Laboratory Accreditation Program
PAH	Polycyclic aromatic hydrocarbons
pc	Point counting
PCB	Polychlorinated biphenyl
PCO	Partial Consent Order
PID	Photoionization detector
PLM	Polarized light microscopy
PPE	Personal protective equipment
ppm	Parts per million
QA/QC	Quality Assurance/Quality Control
QE	Quinnipiac Energy, LLC
%R	Percent recovery

RAP	Remedial Action Plan
RCP	Reasonable Confidence Protocols
RCRA	Resource Conservation and Recovery Act
RCSA	Regulations of Connecticut State Agencies
RL	Reporting limit
RPD	Relative percent difference
RSR	Remediation Standard Regulations
SEH	Significant Environmental Hazard
SOP	Standard Operating Procedure
SOS	Scope of Study
SPLP	Synthetic precipitation leachate procedure
SVOC	Semi-volatile organic compound
TCLP	Toxicity Characteristic Leaching Procedure
TEM	Transmission electron microscopy
TPH	Total petroleum hydrocarbon
TRC	TRC Environmental Corporation
UI	The United Illuminating Company
USCG	United States Coast Guard
USDOT	U.S. Department of Transportation
UST	underground storage tank
vae	Visual area estimation
VOC	Volatile organic compound
XRF	X-ray fluorescence

1.0 Executive Summary

In 2015 the United Illuminating Company (UI) and the Connecticut Department of Energy and Environmental Protection (CTDEEP) entered into Partial Consent Order COWSPCB 15-001 (PCO), which obligates UI to perform certain environmental remediation activities within the property. During the planning phase for soil remedial activities on the property, including the area around Station B, the City of New Haven issued an order to the owners to Demolish Station B due to structural issues and public safety concerns. UI had determined that in light of the City of New Haven's concern over the condition of the structure, its subsequent order to demolish and for UI to meet its PCO obligations, the best approach was for UI to demolish Station B. The field activities began on January 12, 2019 when UI mobilized its remediation contractor to place concrete barriers and signage to close off the pedestrian sidewalk along Station B and one lane of the travel way adjacent to the sidewalk until the abatement and demolition work could commence and remaining throughout the building demolition activities.

Prior to starting abatement and demolition the necessary permits and approvals were obtained from the City of New Haven, the CTDEEP and the CTDPH. Pre-demolition work began on April 1, 2019 with the installation of sediment and erosion controls and the collection and containerizing of waste materials that were inside the building. The abatement, demolition and waste removal activities were performed during the period from April 1, 2019 thru April 3, 2020. TRC provided full-time inspection and monitoring of the contractor's work pursuant to the plans and specifications of work and the Connecticut Department of Health (CTDPH) regulations.

Abatement and demolition of Station B was performed in accordance with permits and approvals issued by federal, state and local agencies and in accordance with federal, state and local applicable regulations and guidance governing the activities. The following Closure Report provides a brief history of the site as it pertains to Station B and the work previously performed by UI and by other owners to assess environmental conditions and address PCBs regulated under 40 CFR Part 761 prior to commencing with the abatement and demolition work. The Closure Report provides a description of the work activities, inspection, monitoring, testing and waste management and disposal performed as part of the project to safely remove Station B. Additionally, the project was successfully completed without worker injury and in accordance with project plans.

2.0 Introduction

2.1 Background

In 2015 The United Illuminating Company (UI) entered into a Partial Consent Order COWSPCB 15-001 (PCO) with Connecticut Department of Energy and Environmental Protection (CTDEEP) to perform remediation of soil, onsite sediment, debris, surface water, groundwater and structures, including certain hazardous building materials within the limits of the site property boundary. To assist UI and to meet the requirements of the PCO, TRC Environmental Corporation (TRC) was retained by UI in 2016 to provide Licensed Environmental Professional (LEP) services as they relate to adherence to and completion of certain LEP tasks outlined in the PCO. For the purposes of the PCO, the Site is comprised of two parcels totaling approximately 8.9-acres located at 510 & 510A Grand Avenue, New Haven CT (referred to as Parcel A & B). The parcels are located within the confines of a steel bulkhead surrounding the property along the east, west and south sides with Grand Avenue bordering the northern property line. The parcels are part of land referred to as Ball Island which separates the Mill River into the East and West branches. The Site included two main buildings (known as English Station and Station B) and multiple smaller structures

In 2000, UI sold the Site to Quinnipiac Energy (QE), In 2006 the site was sold to ASNAT and divided into two parcels of land now referred to as Parcel A (3.58 acres – 510A Grand Ave. - northern parcel) and Parcel B (5.32 acres – 510 Grand Ave. - southern parcel). Since that time both parcels have changed owners. The focus of this Closure Report is to document the demolition of Station B (Parcel A) and the pre-demolition activities conducted prior to its demolition. The Station B building was located on Parcel A of the English Station site at 510A Grand Ave in New Haven, CT and consisted of the northern portion of a former power plant constructed circa 1890, with additions constructed through the mid-1920's. Station B was a two-story structure that occupied a footprint of approximately 25,000 square feet. Station B was immediately south of Grand Avenue and its adjacent sidewalk. Station B was constructed of brick exterior walls with interior steel framing. Station B's use as a power plant reportedly ceased in the early 1930s after the main English Station Generating Station on current day Parcel B was constructed. Following the use of Station B for power generation, the boiler house portion of the structure (southern portion) was demolished and the electrical generating equipment in the interior of the remaining portion of the building was removed. After UI sold the property in 2000 to QE, the structure had limited use and deteriorated over time due to lack of upkeep.

In December 2017, the City of New Haven Building Department performed an inspection of Station B with an outside structural engineer and following the inspection the Building Department issued an order to the owner to remove the deteriorated portions of the brick parapet along Grand Avenue. In early January 2018, the owner hired Capasso Construction to remove the parapet and cover the upper part with anchored poly sheeting. On January 9, 2019 and January 28, 2019, the City of New Haven performed two subsequent inspections with their third-party engineer documenting the continuing deterioration of Station B.

Based on the two January 2019 inspections the City of New Haven Building Department issued an order titled “Notice of Imminent Danger, Order to Vacate and Posting of Unsafe Structure”, dated February 7, 2020 to the owner of Station B to demolish the structure. Since the condition of the building was deemed unsafe by the City of New Haven, UI could not safely perform abatement and cleanup as required in the PCO without making structural improvements to the building to facilitate its work. As such, while UI was not the building owner, in mid-2018, with concurrence with CTDEEP, UI made a decision to address the potential environmental issues associated with Station B by abating and demolishing the structure.

Following required permit approvals from the City of New Haven and with the concurrence of CTDEEP required submittals, demolition work commenced with asbestos abatement preparation on April 24, 2019.

2.2 PCO Required Sampling & PCB Removal Activities

In 2017 various studies of building materials and environmental media within the Station B building and on Parcel A were performed by UI as part of the PCO. The sampling incorporated data from sampling performed by others for previous owners prior to UI’s PCO. In addition, some removal of PCB materials impacted by spills were performed by previous owners and UI. The sections below summarize the studies and remedial actions performed. Where available, UI reviewed previous reports related to Station B and Parcel A and used the data to help guide the Conceptual Site Model (CSM) and development of Scope of Studies.

2.2.1 PCB Investigation & Remediation Performed Inside Station B by Previous Owners (Prior to UI Studies and Demolition)

In 2002, Advanced Environmental Interface (AEI) was retained by QE to perform environmental investigations and develop remedial action plans. Based on data in their report entitled “*2002 Site-Wide PCB Characterization and Cleanup Plan (AEI, 2002)*” Station B was identified as having PCBs and was referred to as PCB Area 1. In 2005 AEI, on behalf of QE performed additional sampling in Station B to assess PCB impacts on the concrete and wood floors based on earlier sampling results and on an overhead crane located in the former Turbine Hall section of the building. Information from those sampling activities are documented in a report entitled “*2005 Interim PCB Report for Station B Parcel Sale (AEI, 2005)*”.

Additionally, AEI collected seven soil samples from the earthen floor of the basement of Station B (identified as PCB Area 1.3 in later reports) during the sampling in 2005. Based on the sample results in the 2005 Interim PCB Report for Station B (AEI, 2005), PCB concentrations above the remedial goal of 1 mg/kg (high occupancy standard in 40CFR Part 761) were not detected in the seven samples. Based on information in the report, following the sampling a concrete floor was poured to cover the earthen portion of the basement to render those soils inaccessible. Installation of the concrete slab was reportedly performed to satisfy Direct Exposure Criteria under the Connecticut Remediation Standards Regulations (RSRs) for other Contaminants of Concern (COCs), not PCBs.

In 2007, on behalf of QE, AEI submitted a cleanup plan titled “*2007 Parcel A PCB Cleanup Plan, AEI (AEI, 2007)*” to the United States Environmental Protection Agency (USEPA) for cleanup of PCBs inside Station B

and other locations on Parcel A. The cleanup plan submittal satisfied the notification and certification requirements of 40 CFR 761.61 (a)(3) and the cleanup of Parcel A and Station B was to be done under the self-implementing option (40 CFR 761.61(a)). On May 22, 2007, the USEPA issued approval the AEI 2007 Plan to QE and in December 2007, notice to proceed was issued to USEPA by QE that the work under the AEI 2007 Plan would commence.

In May 2008, AEI issued a report entitled “*2008 Interim Status Report / Quinnipiac Energy English Station Parcel A PCB Cleanup Plan, AEI (AEI, 2008)*” following the completion of some of the remedial activities identified in the AEI, 2007 cleanup plan, including concrete removal (scarifying first-floor slab) inside Station B and decontamination of the large overhead crane. According to the report, several sections of the concrete on the first floor of Station B (referred to as PCB Area 1.1) were scarified, but verification sample results indicated that the scarification did not meet the remedial goal of <1 mg/kg PCBs (high occupancy standard in 40 CFR Part 761). Verification wipe samples collected subsequent to cleaning the large overhead crane were reported to be below the remedial goal of 10 µg/100 cm² (high occupancy standard in 40 CFR Part 761). Following the submittal of AEI, *2008 Interim Status Report*, additional remedial action was not taken by the site owners to address the remaining PCBs in concrete on the first floor of Station B to reach compliance with the high occupancy standard in 40 CFR Part 761 as specified in the AEI, 2007 cleanup plan.

2.2.2 PCB Investigation & Remediation Performed Inside Station B by UI

During March 2018 UI began the process to complete the remaining remediation of the first-floor concrete slab in Station B to achieve compliance with the high occupancy standard of <1 mg/kg as outlined in 40 CFR Part 761.61(a). The first step in that process was TRC preparing a Remedial Action Plan (RAP) entitled “*REMEDIATION ACTION PLAN AOC-1 - STATION B COMPLETION OF PCB CONCRETE REMOVAL*”. UI submitted the RAP on March 19, 2018 to USEPA and CTDEEP. On April 10, 2018 USEPA issued notice to UI via e-mail of acceptance of the RAP with revised figures, contingent upon collection of four (4) additional concrete verification samples (CO666, CO676, CO682 & CO692).

On May 9, 2018 UI issued 30-day notice along with its contractor work plan to USEPA and the City of New Haven to commence with the work under the RAP, including the requested revised figures and additional verification samples. Clean Harbors Environmental Services of Seymour, Connecticut was retained by UI to perform the remedial work and mobilized to commence the erection of scaffolding protection around the work area. Actual scabbling work (or concrete removal activities) began on June 12, 2018. The scabbling activities, verification sampling and waste disposal activities were completed in late August 2018. TRC prepared a remedial action report (RAR) entitled “*REMEDIATION ACTION REPORT AOC- 1 - STATION B COMPLETION OF PCB CONCRETE REMOVAL*” documenting compliance with the high occupancy standard in 40 CFR Part 761. The document was transmitted by UI to USEPA and CTDEEP on October 22, 2018. The report concluded PCB activities associated with 40 CFR Part 761.61(a) were completed.

2.2.3 Studies of Building Materials and Environmental Media by UI as required by PCO

In the fall of 2016, TRC commenced inspections at the Site and within Station B and on October 16, 2016 a Scope of Study (SOS) *ENGLISH STATION FACILITY - 510 GRAND AVENUE - NEW HAVEN, CONNECTICUT* outlining the investigation of hazardous building materials associated with Station B along with soil and groundwater on the entire site was submitted to CTDEEP. The SOS was approved on July 7, 2017, inclusive of some clarifications embodied in responses to CTDEEP.

In accordance with the approved SOS, TRC performed the hazardous building material inspections and sampling between July and September 2017. The inspections collected information as required in Section B.1.b. of the PCO noted below:

- identified, documented, inventoried and assessed asbestos-containing materials; determined if such materials were friable, damaged, unstable and accessible or may be disturbed by other actions required by the PCO; and determined how to conduct asbestos abatement in a manner that is necessary to comply with all applicable laws in connection with a plan of abatement for such materials in accordance with Section B.1.e.8. of the PCO;
- fully characterized PCB constituents of all caulk, paint, flooring, roofing, mastics, fireproofing, soundproofing, waterproofing, sealants and all other materials;
- sampled PCBs consistent and in compliance with the requirements as set forth in 40 CFR Part 761 for PCBs;
- investigated the presence of lead and mercury; and
- identified non-hazardous and hazardous waste and other hazardous materials.

Work performed as outlined in the SOS was documented in a report prepared by TRC entitled "*INSPECTION FOR HAZARDOUS BUILDING MATERIALS - ENGLISH STATION - STATION B*" dated January 19, 2018. The details of the finding are documented in the report, but in general the TRC building materials investigation found:

- several areas and materials that were classified as friable, accessible and damaged asbestos containing materials that would have to be addressed if Station B remained.
- Samples of building materials collected and analyzed for PCBs were not detected at concentrations equal to or greater than 50 mg/Kg PCBs, therefore the materials were determined not be regulated under 40 CFR Part 761 and could be managed as Excluded PCB Product.
- Lead was found in many of the paints sampled using an X-Ray Fluorescence (XRF) Niton spectrum analyzer and many of the painted surfaces were found to be loose and flaking due to exposure to the elements. (The Niton detector is a portable unit designed to make fast, accurate, non-

destructive measurements of lead concentrations in dry painted surfaces with a detection limit down to 0.1 mg/cm².)

- Minor quantities of hazardous and non-hazardous materials were found that would need to be addressed under the PCO, including universal wastes such as paint, paint thinner, fire extinguishers, gasoline, fluorescent light bulbs/ballasts and mercury containing devices. (A list of materials are identified in Table 7 of the TRC report “*INSPECTION FOR HAZARDOUS BUILDING MATERIALS - ENGLISH STATION - STATION B*” dated January 19, 2018.)

2.3 Station B Demolition & Parcel B Remedial Specifications

Based on the data collected during the SOS of Station B and Parcel A, TRC, on behalf of UI prepared Bid specifications for the abatement of Station B and Weston and Sampson prepared specifications for the demolition of Station B. The abatement and demolition specifications were incorporated into a larger set of drawings and specifications related to the soil remediation for Parcels A & B. Since the abatement and demolition of Station B was not a requirement under the PCO, the specification documents for Station B did not undergo formal review and approval by the CTDEEP. The process of selecting a contractor to abate and demolish Station B and perform the other Phase I soil remediation work on the site began in August 2018 and it concluded with award of a contract to ACV Enviro (ACV) in January 2019.

3.0 Abatement and Demolition of Station B

The demolition of Station B, inclusive of pre-demo abatement activities and removal of hazardous materials was completed between April 1, 2019 and April 3, 2020. To fulfill the obligations of PCO and requirements of the bid specifications and approved plans by DEEP, the following vendors and their roles to support the project are noted below.

3.1 TRC’s Role

TRC was retained by UI to provide the services noted below during the abatement and demolition of Station B:

- Served as project monitor for UI to ensure the project was performed in accordance with bid specs and DEEP approved work plans;
- Prepared and maintained on-site, an updated a site-specific health and safety plan for TRC personnel;
- Ensured that TRC personnel had current valid training, licensing, fit testing, and medical monitoring for the work activities being performed;
- Provided engineering & environmental & licensed asbestos Project Monitor project support;
- Reviewed and commented on contractor submittals and plans for compliance with regulatory requirements and the contract plans and technical specifications;

- Performed on-Site daily inspection & monitoring during asbestos abatement, demolition, waste management, waste load-out and contractor daily ambient work area air monitoring activities;
- Performed verification and tracking of contractor personnel training, license(s), fit testing, medical monitoring and daily personal air monitoring requirements for the work activities being performed;
- Performed inspection of containments, post-abatement visual inspections for re-occupancy following surface cleaning, post-abatement re-occupancy air clearance testing inside containments and other licensed asbestos Project Monitor activities associated with asbestos abatement;
- Performed visual inspection of building surfaces that remained (basement floors, walls, piers & pedestals) and other restricted ground surfaces immediately surrounding Station B to ensure that contractor cleaning of these areas complied with Connecticut Department of Health (CTDPH) rules for asbestos abatement activities and that PCB Excluded Product materials have been removed;
- Provided Licensed asbestos Project Monitor(s) to perform work area air sampling and analysis during active asbestos abatement activities to maintain compliance with CTDPH rules for asbestos abatement activities;
- Sampled and coordinated analytical testing of waste generated to determine appropriate waste classifications for proper disposal;
- Reviewed contractor furnished waste profiles and provided comments to UI;
- Assisted UI with investigating, sampling & documenting the demolition and cleaning of four unknown areas (referred to as Situations 1-4) that were discovered during demolition; and
- Performed visual inspection and PCB verification sampling and analysis of porous substrates of basement foundation elements (walls, floors, piers & pedestals) that remain following removal of PCB containing paints from the surfaces.

3.2 ACV Enviro (ACV) Role

Through competitive bid, ACV was the Contractor retained by UI to complete the abatement and demolition of Station B, including oversight and management of its subcontractors. The services provided by ACV, in accordance with the project bid specifications included the following:

- Provided labor, equipment, materials, supplies and sub-contractors to perform abatement of ACM and PCB materials, demolition and waste management associated with Station B;
- Prepared and maintained on-site, an updated site-specific health and safety plan, conducted daily tailgate meetings with site personnel, performed periodic onsite health and safety audits and maintained a safe work site;
- Ensured that ACV and subcontractor personnel had current training, licensing, fit testing, and medical monitoring for the work activities being performed;
- Erected and maintained stormwater sedimentation and erosion controls, oversaw required inspections, oversaw stormwater discharge monitoring sampling, maintained on-site compliance records and provided UI with copies of inspection and sampling reports;

- Erected, maintained, adjusted and removed Grand Avenue Traffic Control Plan, including concrete barriers, temporary chain link fencing and traffic/pedestrian control signage;
- Performed daily work area ambient air monitoring and reporting required by the Contract Documents and Remedial Action Plans (RAPs);
- Perform daily contractor personnel air monitoring to assess worker exposure conditions;
- Removed, sorted and packaged hazardous wastes, non-hazardous wastes and universal wastes from Station B prior to demolition activities;
- Oversaw the asbestos abatement of asbestos containing material (ACM) that could safely be removed prior to demolition activities in accordance with the CTDPH and USEPA approved permits for these activities;
- Coordinated with utilities to ensure that service connections were properly disconnected prior to commencing with building demolition;
- Assisted with the relocation of the 480V electrical service at the west end of Station B prior to building demolition;
- Oversaw the abatement of ACM for Station B down to the basement slab in accordance with the CTDPH approved Alternative Work Practice (AWP);
- Wetting and misting of building materials during demolition, abatement and waste management activities, pavement sweeping and other site related dust suppression and control;
- Removed Excluded PCB Products associated with building materials, including basement paints on porous surfaces to ≤ 1 ppm;
- Performed demolition and waste management services related to the four situations found during the project;
- Oversaw the abatement, pipe removal, waste management and waste disposal services for the two aboveground abandoned water mains beneath the Station B rear entrance raised platform along the east cable duct bank structure;
- Performed demolition, waste management and waste disposal services for the Station B rear entrance raised platform, brick wall on the west side and concrete wall on the east side enclosing the east cable duct bank structure;
- Removed the reinforced concrete roofs over the cooling water discharge tunnel associated with Situation #3;
- Performed waste sorting, testing, disposal facility profiling, packaging and on-site management during the project;
- Performed coordination of waste shipping, disposal and tracking;
- Decontaminated equipment that came in contact with ACM and PCB Excluded Product materials;

- Performed scrap metal/steel sorting, management, loadout and transportation of metal materials for recycling facility for non-PCB <1 ppm metals/steel and for PCB Excluded Product paint coatings to a permitted out-of-state facility;
- Oversaw the erection of the permanent chain link fence along the north foundation wall of Station B along Grand Avenue to secure the site; and
- Demobilized equipment, office trailer, tools and other material used and stored on the project site.

3.3 List of ACV Subcontractors and Roles

To support the Station B abatement and demo activities, ACV retained the following subcontractors during various portions of the project:

Vendor	Address	Role
HRP Associates	197 Scott Swamp Rd Farmington, CT 06032	Sedimentation and Erosion Control Inspections, Discharge Sampling and Reporting; AWP
Environmental Consulting & Contracting, LLC, (ENCO)	70 W Liberty St, Waterbury, CT 06706	Asbestos abatement of Station B (04/24/2019 thru 05/10/2019)
BesTech, Inc.	25 Pinney St, Ellington, CT 06029	Asbestos abatement of Station B from 05/20/2019 thru project completion
Standard Demolition Services, Inc.	30 Nutmeg Dr Trumbull CT 06611	Performed building demolition (08/08/2019 thru 08/28/19)
Eagle Fence and Guardrail	56 S Canal St, Plainville, 06062	Permanent chain link fence along Grand Avenue & temporary fence for traffic control on Grand Ave.
Dinto Electrical Contractors	121 Turnpike Drive, Middlebury, CT 06762	Relocation of 480 Volt Service at west end of Station B & installation of temporary services at each gate entrance.

3.4 Permits and Notifications

As part of the work for the Station B abatement & Demo, the following permits & notifications were obtained by UI, ACV and its subcontractors:

- City of New Haven – City Plan Commission - Development Permit, which includes Site Plan Review, Soil and Sediment Control Review, Coastal Site Plan Review, Waterfront Supplement, Inland Wetland Review and Site Bond - Approvals CPC 1554-01 and CPC 1554-01A1(Issued to UI on March 20, 2019)
- City of New Haven – City Plan Commission – Floodplain Development Permit - Approvals CPC 1554-01 and CPC 1554-01A1 (issued to UI on January 22, 2019)
- City of New Haven – Building Department – Demolition Permit – Permit #B-19-723 (Original permit issued to Brennan Construction on June 6, 2019 was changed to Standard Demolition)
- City of New Haven – Traffic Department – Traffic Control Permit for Grand Avenue (Issued to UI in November 2018)
- CTDEEP – DEEP-WPED-GP-015 – General Permit for Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities – Application # 201900771 (issued to UI on March 13, 2019)
- CTDPH – Asbestos Abatement Notifications (updates were made to address ACV subcontractor changes, findings of changed scope of abatement work and extensions of time to perform the work. Initial submitted March 18, 2019)
- CTDPH – Alternative Work Practice (updates were made to address ACV subcontractor changes, findings of changed site conditions and extensions of time to perform the work. Initial submitted March 20, 2019)
- USEPA – Notification of Demolition and Renovation (updates were made to address ACV subcontractor changes, findings of changed scope of abatement work and extensions of time to perform the work. Initial submitted March 18, 2019)
- Utilities – Letters of disconnection from Regional Water Authority, Greater New Haven Water Pollution Control Authority, United Illuminating Co., Southern Connecticut Gas Company and Frontier Communications

Copies of permits and authorizations to perform the work are included in Appendix A.

4.0 Abatement and Demolition Air Monitoring

4.1 Asbestos Abatement Air Monitoring

In accordance with the project specifications and work plans, TRC conducted air monitoring during asbestos abatement and demolition activities involving building components containing friable and non-friable asbestos. The sampling and monitoring were completed by appropriately trained and licensed staff and consisted of the following:

Air samples were collected in accordance with the current revision of the National Institute for Occupational Safety and Health (NIOSH) 7400 Method of Air Sampling for Airborne Asbestos Fibers while overseeing the activities of the Abatement Contractor. Frequency and duration of the air sampling during abatement was representative of the actual conditions at the time of the abatement work. The size and configuration of the work area is a factor in the number of samples required to monitor the abatement and demolition activities and was determined by the Project Monitor. The following is an outline of the schedule of samples that were collected by the Project Monitor:

- a. Daily During Abatement involving enclosed containments
 - At the exhaust of air filtering device
 - At the Decontamination Enclosure System
- b. Daily During Demolition involving Asbestos Containing Building Materials
 - At the four corners of the building demolition area
- c. Post-Abatement (re-occupancy air clearance testing)
 - Interior Regulated NPE Area - At least five (5) per homogenous area

The air samples were collected over the duration of the work activity daily. The sample pumps are small portable battery powered vacuum pumps designed for drawing the ambient air through a filter cassette at a pre-set flowrate that collects the particulate in the air. At the end of each day the filter cassettes were removed from the sample pump and processed by the Project Monitor who is an American Industrial Hygiene Association (AIHA) Registered Asbestos Analyst. Each sample was then placed under a Phase Contrast Microscope to determine the total individual fiber count for the sample. The total fiber count does not differentiate between asbestos and non-asbestos fibers. Once the total fiber count for the sample is determined then it is divided by the total volume of air, in cubic centimeters (cc) to determine the ratio of fibers per cc. The Occupational Health and Safety Association (OSHA) has set the permissible exposure level for an 8-hour time weighted average (TWA) period at 0.10 fibers/cc. The USEPA and CTDPH recognize 0.010 fibers/cc as the clearance level in approvals for the work activity. 0.010 fibers/cc is therefore the level that the Project Monitor used to determine the acceptability of the contractor work practices

controlling the work area and maintain a safe work environment for workers and the general public adjacent to the site.

At the completion of abatement activities, each containment area was visually inspected by a TRC licensed Asbestos Project Monitor following ASTM Standard E1368-90 to ensure complete abatement. Following inspection, post abatement asbestos clearance air sampling was conducted by TRC inside each containment area. Post abatement air samples were analyzed on-site by an AIHA Registered Asbestos Analyst from TRC for Phase Contrast Microscopy (PCM) analysis via the National Institute for Occupational Safety and Health (NIOSH) 7400 method for containments in which the removal involves less than 500 LF or 1500 SF of ACM, or via Transmission Electron Microscopy (TEM) for containments in which the removal involves greater than 500 LF or 1500 SF of ACM. The abatement contractor dismantled each containment area following successful post abatement air sampling and analysis. Each containment area received acceptable post abatement clearance criteria air results (less than 0.01 f/cc for each air sample per set of five for each containment area). The abatement contractor dismantled each containment area following successful post abatement air sampling and analysis. TRC air monitoring daily logs are contained in Appendix F.

Station B Asbestos Monitoring (8-hour TWA) during Demolition Activity Only Results Summary (July 22, 2019 thru January 20, 2020).

Total Demolition Workdays involving ACM = 94

Total Air Samples Collected = 393

Total Air Samples Non-Detect < 0.002 fibers/cc = 233(59.3%)

Total Air Samples = 0.002 fibers/cc = 59(15.0%)

Total Air Samples = 0.003 fibers/cc = 84(21.4%)

Total Air Samples = 0.004 fibers/cc = 13 (3.3%)

Total Air Samples = 0.005 fibers/cc = 2 (0.5%)

Total Air Samples = 0.006 fibers/cc = 2 (0.5%) – Maximum fiber count measured during demolition activities

4.2 Ambient Work Area and Site Perimeter Air Monitoring

During work activities involving demolition activities and soil disturbance, ACV performed daily ambient air monitoring to measure total particulates. The air monitoring was performed with TSI DUSTRAK II Model 8530 monitoring devices that were positioned upwind and downwind of the active work area(s). The TSI DUSTRAK II Model 8530 monitoring devices collect and record continuous dust concentrations in the particle size range of 0.1µm to 10 µm using light scattering methods. The device has a reading range of 0.001 mg/m³ to 400 mg/m³. The two devices used by the contractor continuously sampled the ambient air for total particulate concentration and stored the readings electronically for post-processing daily. At the end of each workday the particulate concentration data was downloaded from each device and the readings at 10-minute intervals were processed to determine the average workday TWA concentration of milligrams of particulate per cubic meter of air(mg/m³). The maximum daily instantaneous particulate concentration from each device was also recorded. Each device has an alarm that is triggered based on a

preset threshold to alert the contractor, TRC and UI of activities that need to be adjusted to reduce the airborne total particulate concentration.

Acceptable ambient workday TWA particulate concentrations for this project were based upon two factors. The first was maintaining particulate matter emissions for PM10 below the Connecticut and National Ambient Air Quality Standard of 0.150 mg/m³ on 24-hour average basis. The second was Occupational Safety and Health Administration (OSHA)'s permissible exposure limit (PEL) is for polychlorinated bi-phenyls (PCBs) using the more restrictive criteria for PCBs with 54% chlorine and an average molecular formula of C₁₂H₅Cl₅. The OSHA PEL based on 8-hour TWA using this criterion is 0.500 mg/m³ (OSHA 1998a). The action level of 0.150 mg/m³, being the more restrictive level, was set to be protective against exceeding the PEL and to comply with the ambient air criteria. Since the DUSTRAK devices are measuring total particulate concentration, the actual concentration of PCBs in the particulate is a fraction of the total dust concentration, so the monitoring method was overly conservative and more protective as it relates to the OSHA PEL. Copies of the daily ambient air total particulate monitoring are contained in Appendix G.

Summary of Ambient Dust Monitoring Performed July 22, 2019 thru April 2, 2020

Total Workdays Monitoring = 179 days

Average Workday TWA (based on all 358 Monitor Events (2 x 179 days)) = 0.021 mg/m³

Maximum Workday TWA = 0.090 mg/m³

Minimum Workday TWA = 0.002 mg/m³

5.0 Demolition Procedure

5.1 Pre-demolition work

Prior to demolition activity, ACV implemented sidewalk closure and traffic controls in accordance with the Traffic Control Plan (Appendix C) approved by the City of New Haven. As part of these plans, concrete barriers were utilized to narrow Grand Avenue in the area of the work while still maintaining two-way traffic on the remaining roadway. The appropriate signage to direct traffic and pedestrians was provided. As noted in the Background section of this report, the traffic and pedestrian controls were installed on January 12, 2019 at the request of the City of New Haven Building Department due to concerns about safety associated with the deteriorated condition of Station B.

Erosion and sedimentation controls were installed in early April 2019 by ACV prior to the start of work. Silt fence and straw wattles were installed around the entire perimeter of Ball Island just inside the steel bulkhead. Silt sacks were installed beneath the catch basin grates for the onsite catch basins as well as the catch basin on the south side of Grand Avenue in front of Station B. The initial inspection of the Site controls was performed after the controls were installed in early April 2019 and inspections along with the appropriate monitoring was and continues to be performed as required by CT DEEP's General Permit and approval of UI's Stormwater Pollution Control Plan (SWPCP) and registration. The SWPCP is included in Appendix D.

Exclusion Zone - Station B: During demolition activities personnel, except for ACV machine operators and field personnel manning dust control devices (Dust Boss Misters, water hoses and sprinklers) were restricted from the exclusion zone. The Dust Boss is a high-pressure water mister with mechanical fan that creates a water mist cloud over the work area to suppress fugitive dust and wet down materials. This exclusion zone encompassed the Station B building footprint plus 45' buffer zone, where applicable. This distance on the North Side along Grand Avenue extended out to the concrete barriers and temporary fencing. These areas were marked off with a combination of concrete barriers and fence, temporary construction fence, sawhorses, cones, caution tape and/or signage. In order to ensure potential impacts from the demo or abatement activities to the ground surface immediately surrounding Station B, it was covered with two layers of 10-mil poly sheeting, extending a minimum of 10 feet (or to the extent possible) out in each direction from the footprint of Station B. The poly sheeting was covered with ½" thick plywood and a third layer of poly sheeting on top. Haybales were placed along the outer perimeter of this area.

Prior to demolition, utility lines to Station B were removed and/or disconnected and capped by the respective utility companies in collaboration with ACV's licensed electrical subcontractor. Two temporary utility poles installed by Dinto Electric, approved by UI, one located at the east gate and one at the west gate were utilized to provide electricity during demolition. On-site security cameras that were located on Station B were relocated away from the building structure. A 480-volt electrical service on the west side of Station B was relocated away from the building structure and the exposed conduit was buried. The 480-volt electrical service feeds power to the English Station building to the south on Parcel B. UI disconnected and removed the former high voltage cable that ran inside a concrete encased duct bank in the basement of Station B, see Appendix B.

In addition to removal and relocation of utilities and security equipment, hazardous materials, non-hazardous materials and universal wastes were removed from the building prior to asbestos abatement and demolition. The materials were containerized, labeled and properly disposed.

5.2 Asbestos Abatement

Abatement of asbestos containing materials related to Station B took place prior to and during demolition activities. The abatement work was completed in accordance with the Notifications provided to the CTDPH and USEPA, and in the Sequence of Work initially provided by ACV's abatement subcontractor ENCO and later updated by BesTech Inc. of CT. An Alternative Work Practice (AWP) to address perimeter window units prior to demolition and non-friable building materials during demolition was developed by Alisa Werst, HRP (license #343). The AWP was approved by the Connecticut Department of Public Health (CT DPH) on March 29, 2019.

Pre-demolition abatement work was performed by ENCO (license # 786) and BesTech Inc. (license #16), which are both licensed asbestos abatement contractors in the state of Connecticut. ACV personnel and demolition machine operators were required to have completed a minimum of 32 hours of asbestos worker training and have current medical clearance and respirator fit tests, per OSHA Asbestos in Construction Standard.

As stated in the AWP, known interior asbestos abatement was completed prior to the commencement of building demolition. After the interior abatement activities were completed, the east side exterior Galbestos panels over the cable duct bank, mezzanine windows and glazing debris were removed as described in the AWP. Once the removal of the mezzanine windows was visually cleared by TRC's project monitor, exterior demolition of the building began. Since other ACM were part of the structure to be demolished those items were abated in accordance with the AWP as part of the demolition process. Pre-wetting of demolition areas was first performed to thoroughly wet the structure to be demolished. Continuous wetting and misting of the areas undergoing active demolition were the primary means of controlling airborne asbestos fibers and dust. The excavator used to demolish the structure was retrofitted with a water hose attached to the end of the excavator arm to wet the pieces of the structure that were actively being demolished.

Additional information on the asbestos abatement activities and Sequence of Work by ENCO and BesTech Inc. of CT can be found in Appendix E. Asbestos related notifications to CTDPH and USEPA and the Application for Approval of the AWP with CTDPH approval letter found in Appendix A.

5.3 Project Timeline

Below is a summary of the major site activities and milestones. A timeline with additional timeline detail is located in Appendix O.

Summary of Major Abatement & Demolition Activities Timeline

Pre -Demolition Abatement – 4/24/2019 thru 6/28/2019

Building Demolition - 7/22/2019 thru 12/15/2019

Excluded PCB Paint Removal from Basement – 1/15/2020 thru 2/18/2020

Situation #1(Wastewater Sump) & #2(Raised Platform) Resolution and East Wall Removal – 12/10/2019 thru 01/24/2020

Situation #3 (Cooling Tunnel) Discovery, Scope of Study and Sampling – 01/15/2020 thru 04/12/2020

Situation #4 (Oily Sump) Resolution – 01/14/2020 thru 02/13/2020

Asbestos Material Waste Management – 6/21/2019 thru 2/3/2020

Demolition Debris Waste Management – 8/27/2019 thru 3/31/2020

Hazardous & Non-Hazardous Waste Management – 8/15/2019 thru 4/2/2020

Equipment Decontamination & Demobilization – 4/3/2020

5.4 Field Environmental Sampling – Waste Characterization

Throughout the abatement and demolition activities, TRC oversaw and/or performed the environmental sampling (in accordance with USEPA and CTDEEP regulations) associated with waste characterization of the waste materials generated as part of the abatement and demolition of Station B (Refer to Appendix K for Waste Characterization Lab Reports and timeline). TRC and UI also provided review of waste profiles and manifests prepared by ACV and verified waste transporter and waste facility requirements were meant. TRC also provided visual inspection of waste materials as they were being segregated, stockpiled and

placed into hauling vehicles for shipment offsite for disposal. TRC visually inspected the surfaces of structures after abatement and removal of PCB Excluded Product materials and asbestos containing building materials, per state and federal regulations.

6.0 Removal of Excluded PCB Product Paint and Verification Sampling

Following demolition of Station B to the basement floor, and loadout of waste generated from this activity, TRC staff performed a visual inspection of basement structures (walls, floors, piers & pedestals) proposed to permanently remain, to determine if suspect Excluded PCB Product containing paint was present on those surfaces. Suspect paints were sampled or compared to homogenous paints previously sampled to identify paint that required removal from surfaces.

Surfaces which had been sampled by TRC prior to abatement and demolish activities, and areas which were exposed during demolition and were found to have Excluded PCB Product containing paint on their surfaces were cleaned of the affect paint. These paints were removed by ACV utilizing a dry ice blasting procedure or by utilizing motorized grinders fitted with HEPA shrouds to remove the paint from concrete and steel surfaces slated to remain in Station B. Information on removing paint via ice blasting is provided in Appendix H.

As areas that required paint removal were completed, TRC performed and documented visual inspections confirming the paint had been removed. Once visual inspection was performed, the area was then cleared, and verification sampling was performed as described in Section 6.1.

6.1 Substrate PCB Verification Sampling

Following visual inspection and clearance that paint had been removed from porous surfaces, TRC collected samples of the substrate to document PCB concentrations. TRC marked proposed sample locations on a 5ft. grid over continuous two-dimensional surface which previously had paint. If a porous surface had paint but was less than 5ft. in length or width on any plane, one sample was collected. As a rule, sample spacing was always equal to or less than 5ft. from the nearest sample or edge of a painted area. Verification sample locations are shown on Figure 1-2 and the sample laboratory results for PCBs are contained in Appendix I.

Concrete/porous media samples were collected in accordance with the procedures described in the EPA Region 1 Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) (EPA, 2011). Each concrete sample was collected from a porous surface, in this case concrete, to a depth of a 1/2-inch into each horizontal or vertical surface utilizing a hammer-type drill to pulverize the concrete. The drill bit was decontaminated between each sampling event by scrubbing first with a mixture of Alconox® and distilled water, then rinsed with distilled water, followed by a wipe down with a clean paper towel saturated with hexane, and lastly a rinse with distilled water. Clean, dedicated plastic sample spoons were used to collect and transfer the pulverized concrete into properly labeled, laboratory-supplied sample jars and placed in a cooler with ice.

Concrete/porous media samples were submitted under chain-of-custody protocols to Con-Test for the analysis of PCBs by EPA Method 8082A / 3540C Soxhlet Extraction.

In addition to the porous surface verification samples, four PCB wipe samples were collected from two non-porous steel pipes in the southwestern portion of Station B designated as AOC-1D. Similar to concrete verification sampling protocol, ACV removed the paint from the surfaces of the pipes. TRC then performed a visual inspection to confirm completeness and then TRC collected wipe samples from the non-porous surfaces at <5ft. spacing.

Wipe samples were collected using the standard wipe test as defined at 40 CFR 761.123. Specifically, at each location selected for sampling, a disposable 10 centimeter (cm) by 10 cm template was affixed to the location and the 10 cm x 10 cm section of the non-porous surface being sampled was wiped with a gauze pad saturated with hexane. Once a surface was wiped completely, the gauze pad was placed in clean, laboratory-supplied glass vial, capped and labeled. Wipe samples were submitted under chain-of-custody protocols to Con-Test for the analysis of PCBs by EPA Method 8082A / 3540C Soxhlet Extraction.

7.0 Waste Management

7.1 Waste and Recycling Streams

The following waste streams were generated and profiled for off-site disposal:

Waste Stream	Waste Description	Disposal Facility
Universal Wastes	<ul style="list-style-type: none"> - 2' and 8' Fluorescent Bulbs - Mercury vapor lamps -Mercury switches - Lead Acid Batteries - PCB and Non-PCB Ballast - Used electronics 	NLR (shipped on a Straight Bill of Lading)
Refrigerant	removed form AC units (Chlorodifluoromethane - UN1018)	Hudson Technologies Group, NY
RCRA Hazardous Waste and CT Regulated Waste	<ul style="list-style-type: none"> -Snow Floc Aerosol – D001 - Lab Pack – Quart of Charcoal lighter Fluid and 1 Gallon Paint – D001 - Lab Pack – Quart of Hand Soap – CR04 	Tradebe Treatment and Recycling of Bridgeport
Propane Cylinders	- 4 Propane Cylinders – D001	Cycle Chem
RCRA Hazardous Waste	<ul style="list-style-type: none"> - Lab Pack 55-Gallon Drum containing 1-gal of oil-based paint, 5-gal of paint thinner and 5-gal of black tar – D001 - Lab-Pack 5-gallon pail containing 1-Qt. of lighter fluid – D001 	Cycle Chem

Waste Stream	Waste Description	Disposal Facility
Non-Hazardous Waste	- Lab Pack 5-gallon pail containing 1 qt. of transmission oil and 1 qt. of hand soap – CR04 - 2-55-gallon drums of off-spec gasoline -13 fire extinguishers	Cycle Chem
ACM and ACM with PCB Excluded Product Waste from abatement and demolition	- 174 truckloads (various containers: roll-off dumpster, trailer dump trucks)	Minerva Landfill
PCB Excluded Product Waste debris from final clean-up of Station B basement and exclusion area	- 3 truckloads – 1 trailer dump and 2 dump trucks	Turnkey Landfill
Unregulated Steel for Recycling	- 2 Roll-off dumpsters	Liberty Recycling/Gateway Terminal
Painted Steel (Lead and/or PCB Excluded Product)	- 32 Roll-off dumpsters	NHL Kellam in NY
CMU Debris non-contaminated, non-regulated waste	- 1 Roll-off dumpster	Murphy Recycling
Situation #1 wastewater sludge	- 623 gallons in vac-truck – CR04	Tradebe Treatment and Recycling of Bridgeport

Copies of manifests, BOLS, or other applicable shipping documents for waste transported from the Site as part of the Station B demolition project can be found in Appendix J.

7.2 Demolition Debris Staging Area and Waste Loading

Demolition debris (ACM with PCB Excluded Product) was staged within the footprint of Station B during and after demolition of the structure. If demolition debris fell outside of the footprint of the structure, ACV placed the materials back within the footprint as soon as discovered. Upon completion of the demolition, the poly and plywood protective cover were disposed of.

Waste was loaded for transport based on logistics and scheduling of transporters by ACV. Demolition debris (ACM with PCB Excluded Product) was loaded directly into trucks or dumpsters fitted with a sealed 6-mil poly-liner. Enco or BesTech (licensed abatement contractors) oversaw the lining and preparation of the transport vehicles or waste containers that received ACM with PCB excluded product demolition debris waste. Debris left stockpiled within the building footprint overnight was covered by ACV and/or BesTech with 6-mil poly sheeting and secured around the perimeter of the pile to the satisfaction of the TRC project monitor until the debris was loaded and transported to the disposal facility.

8.0 Transporter Information

Debris generated during the demolition of Station B, was stockpiled and loaded into transport vehicles by ACV. TRC, as a representative of UI executed the waste manifest documents as the trucks were loaded throughout the course of the project. As noted in Section 2.2 ACV coordinated transportation and scheduling of the waste to the appropriate waste disposal facility. All wastes haulers were permitted to transport the materials that they handled.

8.1 Transporters

The following companies, retained by ACV were used to transport waste:

Vendor Name	Address
Allstate Power Vac, Inc	1500 Rahway Avenue, Avenel, NJ 07001
Landeen Trucking	1130 Spindle Hill Road, Wolcott, CT 06716
Red Technologies LLC	173 Pickering Street, Portland, CT 06480
ACV Enviro	118 Burr Court, Bridgeport, CT 06605

9.0 Disposal/Recycling Facility Information

9.1 Disposal/Recycling Facility Information

The following disposal/recycling facilities were used for the types of wastes listed:

Waste Stream	Vendor Name	Address
C&D Debris	Murphy Road Recycling, LLC	19 Wheeler St., New Haven, CT
Non-PCB Painted Steel for Recycling	Liberty Recycling	681 Broad St., Bristol, CT 06010
ACM and PCB Excluded Product and ACM and Bulk Product Wastes from Abatement Activities	Minerva Enterprises, LLC	8955 Minerva Road SE, Wayneburg, OH 44688
PCB Excluded Product final clean-up debris	Waste Management – Turnkey Landfill	90 Rochester Neck Road Rochester, NH 03839
Situation #1 wastewater sludge	Tradebe Treatment and Recycling of Bridgeport	50 Cross Street Bridgeport, CT 06610
Scrap Metal (Steel) with Lead and/or PCB Excluded Product Paint	N H Kelman, Inc. Scrap Recycling	41 Euclid St Cohoes, NY 12047

Waste Stream	Vendor Name	Address
Hazardous & Non-Hazardous Lab Pack Wastes	Cycle Chem	201 S 1st St Elizabeth, NJ 07206

Copies of licenses or permits to operate for each disposal/recycling facility that was used, are included in Appendix L.

10.0 Site Control

10.1 Traffic Control

ACV implemented traffic controls on Grand Ave as shown in the Traffic Control Plans (Appendix C). Traffic controls were in place from 1/12/2019 through 12/20/2019.

10.2 Dust Control

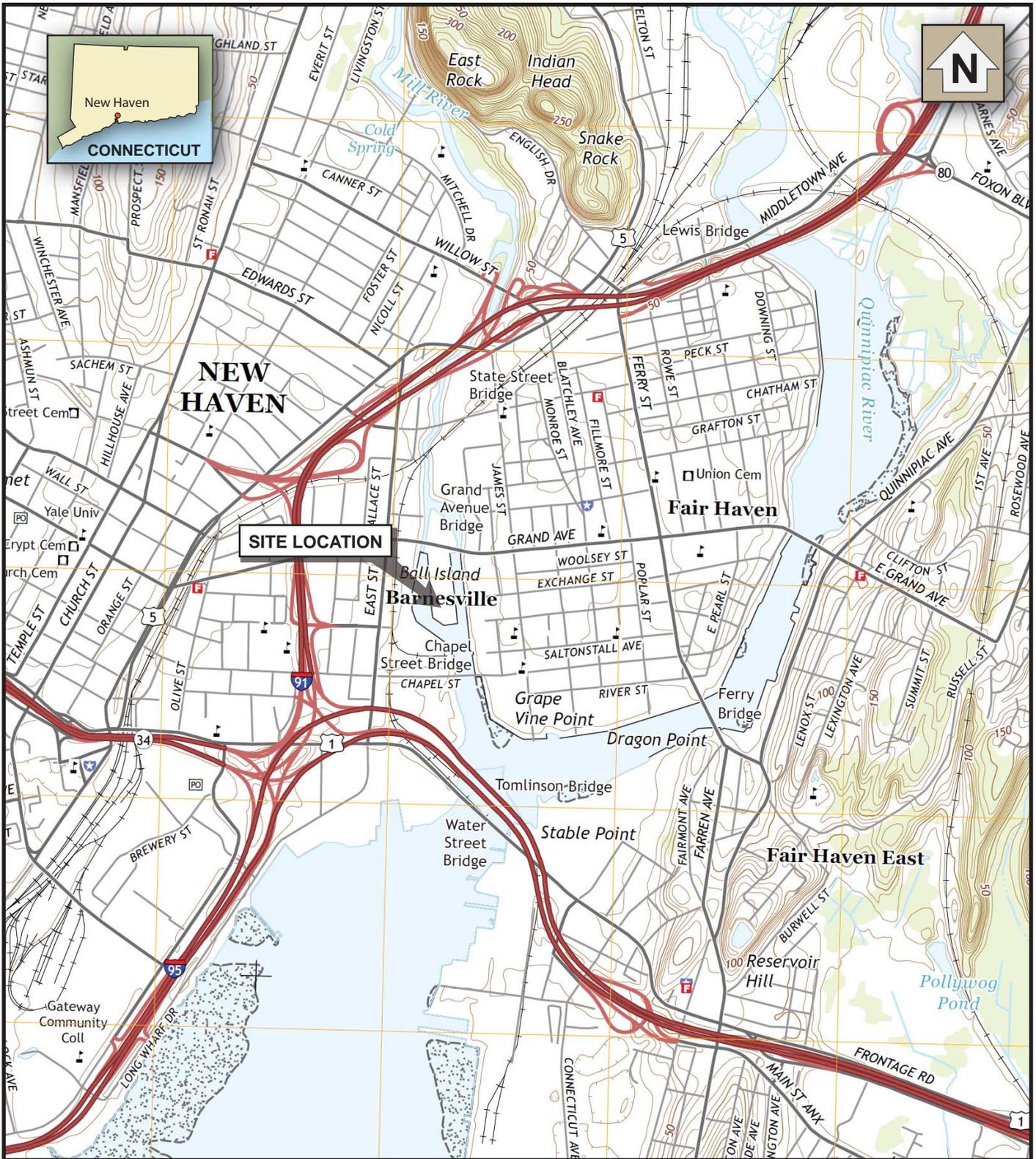
Throughout demolition two DustBoss® 60 (DB-60) units were used to keep the primary work area constantly wetted with fine mist and to suppress fugitive dust during active demolition activities. Additionally, AVC and BesTech staff utilized handheld hoses to more precisely wet target areas, as needed as demolition, abatement, and waste loadout progressed. ACV also equipped hoses to excavator arms to reach unsafe areas with water for dust suppression during demolition.

To document the dust control measures, ACV performed daily ambient air monitoring for total particulate throughout the duration of the project. Copies of daily logs are found in Appendix G.

10.3 Decontamination

Equipment (machinery & tools) that came into contact with ACM and/or Excluded PCB Product building materials (>1<50ppm) was decontaminated by ACV using a double wash rinse procedure utilizing an industrial grade surfactant prior to being moved outside the work area and transported off-site. TRC performed a post decontamination visual inspection of the cleaned equipment to ensure that no visible debris remained. Waste generated during decontamination was collected and properly disposed of.

FIGURES



SITE LOCATION



21 Griffin Road North
Windsor, CT 06095
Phone: 860.298.9692

ENGLISH STATION
510 GRAND AVENUE, NEW HAVEN, CT

FIGURE 1-1
SITE LOCATION MAP

DATE: 10/2016 PROJECT NO. 263951.0000.000000



1:24000

BASE CREATED WITH 7.5' USGS TOPOGRAPHIC MAP
NEW HAVEN, CT 2015

APPENDIX A

**Permits and Authorizations to Perform Abatement and
Demolition of Station B**

City of New Haven – City Plan Commission

Development Permit, which includes:

**Site Plan Review, Soil and Sediment Control Review, Coastal
Site Plan Review, Waterfront Supplement, Inland Wetland
Review and Site Bond – Approvals CPC 1554-01 and CPC 1554-
01A1**

**NEW HAVEN CITY PLAN COMMISSION COASTAL SITE PLAN REVIEW
NEW HAVEN CITY PLAN COMMISSION SITE PLAN REVIEW**

RE: 510 GRAND AVENUE. Coastal Site Plan and Soil Erosion and Sediment Control Review for on-site soil remediation activities in an IH zone. (Owner: David Tropper for Haven River Properties; Applicant/Agent: Shawn Crosbie of The United Illuminating Company)

REPORT: 1554-01

ACTION: Approval with Conditions

STANDARD CONDITIONS OF APPROVAL

1. Pursuant to State Statute, this site plan and soil erosion and sediment control plan approval is valid for a period of five (5) years following the date of decision, until March 20, 2024. Upon petition of the applicant, the Commission may, at its discretion, grant extensions totaling no more than an additional five (5) years to complete all work connected to the original approval.
2. The applicant shall record on the City land records an original copy of this Site Plan Review report (to be provided by the City Plan Department) and shall furnish written evidence to the City Plan Department that the document has been so recorded (showing volume and page number), prior to City Plan signoff for building permits. A digital copy of the recorded report shall be provided to staff (.pdf).
3. Upon approval by the City Plan Commission, provide compiled digital copies of all application materials, including drawing sets and reports, to staff for filing (.pdf files) prior to City Plan signoff for building permits.
4. Comments under **ADDITIONAL CONDITIONS OF APPROVAL** shall be reviewed with the City Plan Department and resolution reflected on final plans, prior to their circulation for signoff.
5. Signoff on final plans by the Greater New Haven Water Pollution Control Authority; City Engineer; Department of Transportation, Traffic, and Parking; City Plan Department; and Fire Marshal in that order shall be obtained prior to initiation of site work or issuance of building permit.
6. Construction Operations Plan/Site Logistics Plan, including any traffic lane/sidewalk closures, temporary walkways, detours, signage, haul routes to & from site, and construction worker parking plan shall be submitted to the Department of Transportation, Traffic and Parking for review and approval to prior to City Plan signoff on final plans for building permit.
7. A site bond will be required in conformity with Connecticut General Statutes Section 8-3(g). Bond, or other such financial instrument, shall be provided to the City Plan Department, in an amount equal to the estimated cost of implementation of erosion and sediment controls, plus 10 percent, prior to City Plan final sign-off on plans for building permit.
8. As authorized by CGS Sec. 22a-107 an additional bond is required to secure compliance with all conditions of approval relating to the coastal site plan. The bond amount is to be determined based on consultation with City Plan and Engineering staff.
9. The name of an individual responsible for monitoring the soil erosion and sediment control plan on a daily basis during the construction period shall be provided to the City Plan Department, prior to City Plan signoff on final Plans.
10. Any proposed work within City right-of-way will require separate permits.
11. Any sidewalks or curbs on the perimeter of the project deemed to be in damaged condition shall be replaced or repaired in accord with City of New Haven standard details.
12. Filing (with City Plan) and implementation of a Storm Drainage Maintenance Plan and Inspection Schedule is required.
13. Following completion of construction, any catch basins in the public right-of-way impacted by the project shall be cleaned, prior to project close out.
14. As-built site plan shall be filed with City Plan Department, with a copy to the City Engineer, prior to project close out. Site Plan shall be submitted in mylar and digital form (.pdf).

**Submission: SPR Application Packet including DATA, WORKSHEET, SITE, SESC, and CSPR forms.
Application fee: \$360. Received January 4, 2019.**

- Soil Erosion and Sediment Control Plan dated December 2018. Received January 4, 2019.
- Application drawings. 14 sheets received January 4, 2019.
 - Title Sheet. Dated July 13, 2018. Received January 4, 2019.
 - G-1: Abbreviations, Notes and Legend. Dated July 13, 2018. Received January 4, 2019.
 - Property Survey. Drawing date November 28, 2016. Received January 4, 2019.
 - C-1: Existing Conditions Plan. Dated July 13, 2018. Received January 4, 2019.
 - C-2: Construction Phasing Plan. Dated July 13, 2018. Received January 4, 2019.
 - C-3: Site Work and Demolition Plan. Dated November 9, 2018. Received January 4, 2019.
 - C-4: PCB Remediation – Parcel A and North Side Parcel B. No date. Received January 4, 2019.
 - C-5: PCB Remediation – South Side Parcel B. Dated July 13, 2018. Received January 4, 2019.
 - C-6 & C-7: Other COCs Remediation – North Side. Dated July 13, 2018. Received January 4, 2019.
 - C-8: CAP Cross Sections. Dated July 13, 2018. Received January 4, 2019.
 - D-1 – D-3: Details I-III. Dated July 13, 2018. Received January 4, 2019.
 - Haul Routes. Received February 14, 2019.

PROJECT SUMMARY:

Project: English Station Soil Remediation Project

Address: 510 Grand Avenue

Site Size: 378,621 SF (8.69 acres)

Zone: IH (Heavy Industry)

Owner: David Tropper for Haven River Properties

Applicant/Agent: Shawn Crosbie of The United Illuminating Company

Site Engineer: Carl Stopper of TRC Companies, INC

Phone: (917) 705-7023

Phone: (203) 926-4595

Phone: (203) 876-1453

BACKGROUND

Previous CPC Actions:

CPC 1107-07: Presentation on proposed Contingency Combustion Turbine Energy Project at English Station. No action. February 21, 1990.

CPC 1108-07: Coastal Site Plan Review for Substation at English Station and related Components of the Grand/Goffe Project. Approved March 7, 1990.

CPC 1108-03: Application to Connecticut Siting Council, Advice to Mayor regarding Contingency Combustion Turbine Energy Project at English Station. Approved March 7, 1990.

CPC 1149-07: Coastal Site Plan Review for installation of two gas fueled boilers and stack at English Station. Approved June 17, 1992.

Zoning:

The Site Plan as submitted meets the requirements of the New Haven Zoning Ordinance for the IH zone.

Site description/existing conditions:

The project site, located on Ball Island, encompasses an area of approximately 378,621 SF (8.69 acres) and consists of a paved driveway and parking lot, a two-story former electrical generating plant, the former English Station power generating plant, an assembly hall, a storage building, a foam house, a paved coal bin storage area, a lined waste water surge basin, cable houses, and a subsurface cooling water tunnel. The site is retained by a steel bulkhead and is bounded by Grand Avenue in the north and the Mill River in the east, south, and west.

Proposed activity:

The applicant proposes to conduct remedial activities on site to remediate soil impacted by PCB and other pollutants. Proposed remedial activities include the excavation and off-site disposal of PCB-impacted soil and surplus non-PCB-impacted soil, sediment, and porous materials, the collection of soil samples for further PCB and non-PCB-impacted soil analysis, dewatering and removal of sediment from the cooling water tunnel, preparation of sub-grade and on-site relocation of soils in areas of capping, construction of soil and asphalt caps to render soils inaccessible, the restoration of soil excavation areas and the cooling tunnel with suitable backfill soil.

Public Health and Safety:

In order to address potential public health and safety concerns during construction, the applicant proposes to install new permanent and temporary fencing, signage, and physical barriers throughout and along the perimeter of the site. The applicant also proposes to conduct dust monitoring for total particulate emissions and fugitive dust within work areas and along the perimeter of the site during building demolition and soil excavation continuously using real-time measurement equipment. In order to control dust from construction activities, the applicant proposes to provide water or alternate means of dust suppression on site as necessary.

Motor vehicle circulation/parking/traffic:

No changes to existing parking are proposed. The applicant proposes to install an access driveway along the western portion of the site in order more efficiently navigate the site when removing contaminated materials.

Waste Management:

Excavated PCB-impacted soil and concrete will either be live-loaded into waste containers for transfer to an offsite disposal facility or transported to onsite waste storage areas made of a high strength geomembrane. Approximately 3,400 cubic yards of excavated soil will be placed under the proposed soil cap. PCB-impacted soil, sediment and porous materials will not be stored beneath the soil cap.

Sec. 58 Soil Erosion and Sediment Control:

- Class A (minimal impact)
- Class B (significant impact)
- Class C (significant public effect, hearing required)

Cubic Yards (cy) of soil to be moved, removed or added: 27,700 CY

Start Date: March 2019

Completion Date: November 1, 2019

Responsible Party for Site Monitoring:

Once a contractor is chosen, an individual will be named as the individual responsible for monitoring soil erosion and sediment control measures on a daily basis, and that name provided to the City Plan Department prior to signoff of final plans for permits.

This individual is responsible for monitoring the site to assure there is no soil or runoff entering City catch basins or the storm sewer system. Other responsibilities include:

- monitoring soil erosion and sediment control measures on a daily basis;
- assuring there is no dust gravitation off site by controlling dust generated by vehicles and equipment and by soil stockpiles during the demolition;
- determining the appropriate response, should unforeseen erosion or sedimentation problems arise; and
- ensuring that SESC measures are properly installed, maintained and inspected according to the SESC Plan.

Should soil erosion problems develop (either by wind or water) following issuance of permits for site work, the named party is responsible for notifying the City Engineer within twenty-four hours of any such situation with a plan for immediate corrective action.

All SESC measures are required to be designed and constructed in accordance with the latest Standards and Specifications of the *Connecticut Guidelines for Soil Erosion and Sediment Control*.

Note: Because the project is larger than 5 acres, the applicant is required to obtain a General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction from CT DEEP in addition to adhering to the erosion and sediment control regulations of the City of New Haven.

**Sec. 60 Stormwater Management Plan: SUBMISSION MEETS REQUIREMENTS
REQUIRED DOCUMENTATION**

- Soil characteristics of site;
- Location of closest surface water bodies and depth to groundwater;
- DEEP ground and surface water classification of water bodies;
- Identification of water bodies that do not meet DEEP water quality standards;
- Proposed operations and maintenance manual and schedule;
- Location and description of all proposed BMPs;
- Calculations for stormwater runoff rates, suspended solids removal rates, and soil infiltration rates;
- Hydrologic study of pre-development conditions commensurate with conditions.

STANDARDS

- Direct channeling of untreated surface water runoff into adjacent ground and surface waters shall be prohibited;
- No net increase in the peak rate or total volume of stormwater runoff from the site, to the maximum extent possible, shall result from the proposed activity;
- Design and planning for the site development shall provide for minimal disturbance of pre-development natural hydrologic conditions, and shall reproduce such conditions after completion of the proposed activity, to the maximum extent feasible;
- Pollutants shall be controlled at their source to the maximum extent feasible in order to contain and minimize contamination;
- Stormwater management systems shall be designed and maintained to manage site runoff in order to reduce surface and groundwater pollution, prevent flooding, and control peak discharges and provide pollution treatment;
- Stormwater management systems shall be designed to collect, retain, and treat the first inch of rain on-site, so as to trap floating material, oil and litter;
- On-site infiltration and on-site storage of stormwater shall be employed to the maximum extent feasible;
- Post-development runoff rates and volumes shall not exceed pre-development rates and volumes for various storm events. Stormwater runoff rates and volumes shall be controlled by infiltration and on-site detention systems designed by a professional engineer licensed in the state of Connecticut except where detaining such flow will affect upstream flow rates under various storm conditions;
- Stormwater treatment systems shall be employed where necessary to ensure that the average annual loadings of total suspended solids (TSS) following the completion of the proposed activity at the site are no greater than such loadings prior to the proposed activity. Alternately, stormwater treatment systems shall remove 80 percent TSS from the site on an average annual basis; and
- Use of available BMPs to minimize or mitigate the volume, rate, and impact of stormwater to ground or surface waters.

Sec. 60.1 Exterior Lighting: Not applicable

Sec. 60.2 Reflective Heat Impact: Not applicable

COASTAL SITE PLAN REVIEW

The Commission's Coastal Site Plan Review, in accordance with Section 55.C of the New Haven Zoning Ordinance shall consider the characteristics of the site, including location and condition of any coastal resources; shall consider the potential effects, both beneficial and adverse, of the proposed activity on coastal resources and future water-dependent development opportunities; follow the goals and policies of the Connecticut Coastal Management Act, as amended, and identify conflicts between the proposed use and any goal or policy of the Act.

Applications for development on waterfront parcels shall additionally consider protection of the shoreline where there is erosion or the development is likely to cause erosion; degree of water dependency; preservation of significant natural vistas and points or avenues of views of the waterfront; provision of meaningful public access; and insurance of outstanding quality of design and construction to produce an environment that enhances its waterfront location.

The Commission will also consider whether the proposed application is consistent with the City's Municipal Coastal Program.

Characteristics and Condition of Coastal Resources at or Adjacent to the site:

Coastal Flood Hazard Area (Flood Zone): The project site is located within Special Flood Hazard Area (the area subject to inundation by the 1% annual chance flood (100-year flood)) Zone AE, as defined by FEMA Flood Insurance Rate Maps (FIRM) panels 09009C0441J and 09009C0442J effective July 8, 2013.

Developed Shorefront: The entire project site is located on and adjacent to highly urbanized/industrial waterfront in New Haven's Mill River District.

Island: The project site is located on Ball Island which is fully developed with industrial/commercial activities and surrounded along the perimeter by a steel bulkhead. The site bounded by the Mill River in the east, south, and west and by Grand Avenue in the north.

Nearshore Waters: The project site and proposed activities are located immediately adjacent to the Mill River. A steel bulkhead surrounds the island upon which the site is located.

Shorelands: The project site is located within the coastal boundary on a developed waterfront adjacent site.

Coastal Program Criteria	Comments
1. Potential adverse impacts on coastal resources and mitigation of such impacts	<i>None. The proposed project will reduce the total impervious area on site from 6.9 acres to 4.55 acres, reducing runoff from the site. Potential adverse impacts from remaining impervious surfaces will be mitigated through the cleaning of an existing catch basin and the installation of a new catch basin and pipe outfall through the bulkhead.</i>
2. Potential beneficial impacts	<i>Proposed remediation activities, including the excavation and disposal/management of contaminated soils, the construction of a soil cap, the regrading of the site to above flood hazard elevations, and the installation of a stone infiltration trench, are expected to improve existing conditions and minimize the potential for contaminated soils and runoff from entering the Mill River. Contaminated soils will either be removed or rendered inaccessible, significantly improving current site conditions and minimizing potential public health and safety risks associated with contaminated materials on site.</i>
3. Identify any conflicts between the proposed activity and any goal or policy in the §22a-92, C.G.S. (CCMA)	<i>None.</i>
4. Will the project preclude development of water dependent uses on or adjacent to this site in the future?	<i>No. The site is appropriate for water-dependent use in the future, but that is not addressed in this application.</i>
5. Have efforts been made to preserve opportunities for future water-dependent development?	<i>No. The site is being remediated to meet industrial standards. The proposed project will not preclude future water-dependent development.</i>

6. Is public access provided to the adjacent waterbody or watercourse?	No.
7. Does this project include a shoreline flood and erosion control structure (i.e. breakwater, bulkhead, groin, jetty, revetment, riprap, seawall, placement of barriers to the flow of flood waters or movement of sediment along the shoreline)?	No. <i>The existing perimeter steel bulkhead will remain and will not be altered.</i>
8. Does this project include work below the Coastal Jurisdiction Line (i.e. location of topographical elevation of the highest predictable tide from 1983 to 2001)? New Haven CJL elevation is 4.6'.	No.

Project Timetable: Site work is expected to begin in March 2019 and be completed by November 2019.

SITE PLAN REVIEW

Plans for both Parcel A (510A Grand Avenue) and Parcel B (510 Grand Avenue) have been reviewed by the Site Plan Review team with representatives from the Departments of City Plan, City Engineer, Building, Disabilities Services and Transportation, Traffic and Parking and have been found to meet the requirements of City ordinances, regulations, and standard details.

COASTAL FINDING:

Taking into consideration all of the above information, the City Plan Commission finds the proposed activity consistent with all applicable goals and policies in Section 22a-92 of the Connecticut Coastal Management Act and incorporates as conditions or modifications all reasonable measures which would mitigate the adverse effects on coastal resources. The Commission therefore makes a finding of no impact on coastal resources and approval for a coastal permit to be issued.

ACTION

The City Plan Commission approves the submitted Site Plans subject to conditions on Page 1.

ADOPTED: March 20, 2019
Edward Mattison
Chair

ATTEST: MPL
Michael Piscitelli, AICP
Interim Economic Development Administrator

Coastal Site Plan Review, based upon the application and materials submitted by the applicant, was conducted administratively without hearing by the City Plan Commission of the City of New Haven in accordance with the Connecticut Coastal Management Act (CGS, Sections 22a-90 to 22a-112). The Building Official hereby receives the above written findings and any conditions thereof are made conditions of the Building Permit.

ADOPTED: March 20, 2019

ATTEST: [Signature]
James Turcio
Building Official

City of New Haven – City Plan Commission
Floodplain Development Permit
Approvals CPC 1554-01 and CPC 1554-01A1

NEW HAVEN CITY PLAN COMMISSION SITE PLAN REVIEW

RE: 510 GRAND AVENUE. Site Plan and Coastal Site Plan Review for changes to a previously approved site plan for remediation and grading activities in an IH zone. (Applicant/Agent: Carl Stopper of TRC Companies)
REPORT: 1554-01A1
ACTION: Approval with Conditions

STANDARD CONDITIONS OF APPROVAL

1. Pursuant to State Statute, this site plan and soil erosion and sediment control plan approval is valid for a period of five (5) years following the date of decision, until December 18, 2024. Upon petition of the applicant, the Commission may, at its discretion, grant extensions totaling no more than an additional five (5) years to complete all work connected to the original approval.
2. The applicant shall record on the City land records an original copy of this Site Plan Review report (to be provided by the City Plan Department) and shall furnish written evidence to the City Plan Department that the document has been so recorded (showing volume and page number), prior to City Plan signoff for building permits. A digital copy of the recorded report shall be provided to staff (.pdf).
3. The applicant shall refer to and complete the Conditions of Approval indicated on the original Site Plan and Coastal Site Plan approval (CPC Report 1554-01).

Submission:

- Letter entitled "Grading Plan Revisions for Parcel A for Soil Remediation" dated September 19, 2019. Received September 19, 2019.
- Application drawings. 2 sheets received September 19, 2019.
 - C-6: Soil and Asphalt Barriers – North Side. Sealed September 18, 2019. Received September 19, 2019.
 - C-8: Barrier Cross Sections. Sealed September 18, 2019. Received September 19, 2019.

PROJECT SUMMARY:

Project: English Station Soil Remediation Project (Grading Plan Revisions for Parcel A for Soil Remediation)

Address: 510 Grand Avenue

Site Size: 378,621 SF (8.69 acres)

Zone: IH (Heavy Industry)

Owner: David Tropper for Haven River Properties

Phone: (917) 705-7023

Applicant/Agent: Carl Stopper of TRC Companies, INC

Phone: (860) 298-9692

BACKGROUND

Previous CPC Actions:

CPC 1107-07: Presentation on proposed Contingency Combustion Turbine Energy Project at English Station. No action. February 21, 1990.

CPC 1108-07: Coastal Site Plan Review for Substation at English Station and related Components of the Grand/Goffe Project. Approved March 7, 1990.

CPC 1108-03: Application to Connecticut Siting Council, Advice to Mayor regarding Contingency Combustion Turbine Energy Project at English Station. Approved March 7, 1990.

CPC 1149-07: Coastal Site Plan Review for installation of two gas fueled boilers and stack at English Station. Approved June 17, 1992.

CPC 1554-01: Coastal Site Plan and Soil Erosion and Sediment Control Review for on-site soil remediation activities in an IH zone. Approved March 20, 2019.

Zoning:

The revised Site Plan meets the requirements of the New Haven Zoning Ordinance for the IH zone.

Site description/existing conditions:

The project site, located on Ball Island, encompasses an area of approximately 378,621 SF (8.69 acres) and consists of a paved driveway and parking lot, a two-story former electrical generating plant, the former English Station power generating plant, an assembly hall, a storage building, a foam house, a paved coal bin storage area, a lined waste water surge basin, cable houses, and a subsurface cooling water tunnel. The site is retained by a steel bulkhead and is bounded by Grand Avenue in the north and the Mill River in the east, south, and west.

Background:

On March 20, 2019, the applicant received Site Plan and Coastal Site Plan approval to conduct remedial activities at 510 Grand Avenue (Parcel A and Parcel B) to remediate soil impacted by PCB and other pollutants. Approved remedial activities included the excavation and off-site disposal of PCB-impacted soil and surplus non-PCB-impacted soil, sediment, and porous materials, the collection of soil samples for further PCB and non-PCB-impacted soil analysis, dewatering and removal of sediment from the cooling water tunnel, preparation of sub-grade and on-site relocation of soils in areas of capping, construction of soil and asphalt caps to render soils inaccessible, the restoration of soil excavation areas and the cooling tunnel with suitable backfill soil. Since received approval from the City Plan Commission, the applicant has been working with Connecticut Department of Environmental Protection (CTDEEP) to finalize their approval of the Remedial Action Plans on site.

Proposed activity:

In response to CTDEEP's Conditional Approval for the Soil Remediation Alternatives Analysis, the applicant is requesting the approval of minor amendments to the originally approved site plan from the Commission. The proposed changes include slightly lowering the center top elevation of grass vegetated soil barrier on Parcel A by three (3) feet (from 4% to 2%). The changes will result in approximately 3,500 cubic yards of soil material being removed from the site and disposed of offsite at a permitted soil facility, that would have otherwise been placed beneath the soil barrier under the original approval. The site plan will still comply with city and state requirements after the changes.

Sec. 58 Soil Erosion and Sediment Control:

- Class A (minimal impact)
- Class B (significant impact)
- Class C (significant public effect, hearing required)

Cubic Yards (cy) of soil to be moved, removed or added: 27,700 CY

The on-site soil monitor is responsible for monitoring the site to assure there is no soil or runoff entering City catch basins or the storm sewer system. Other responsibilities include:

- monitoring soil erosion and sediment control measures on a daily basis;
- assuring there is no dust gravitation off site by controlling dust generated by vehicles and equipment and by soil stockpiles during the demolition;
- determining the appropriate response, should unforeseen erosion or sedimentation problems arise; and
- ensuring that SESC measures are properly installed, maintained and inspected according to the SESC Plan.

Should soil erosion problems develop (either by wind or water) following issuance of permits for site work, the named party is responsible for notifying the City Engineer within twenty-four hours of any such situation with a plan for immediate corrective action.

All SESC measures are required to be designed and constructed in accordance with the latest Standards and Specifications of the *Connecticut Guidelines for Soil Erosion and Sediment Control*.

Note: Because the project is larger than 5 acres, the applicant is required to obtain a General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction from CT DEEP in addition to adhering to the erosion and sediment control regulations of the City of New Haven.

Sec. 60 Stormwater Management Plan: Consistent with original

Sec. 60.1 Exterior Lighting: Not applicable

Sec. 60.2 Reflective Heat Impact: Not applicable

COASTAL SITE PLAN REVIEW

The Commission's Coastal Site Plan Review, in accordance with Section 55.C of the New Haven Zoning Ordinance shall consider the characteristics of the site, including location and condition of any coastal resources; shall consider the potential effects, both beneficial and adverse, of the proposed activity on coastal resources and future water-dependent development opportunities; follow the goals and policies of the Connecticut Coastal Management Act, as amended, and identify conflicts between the proposed use and any goal or policy of the Act.

Applications for development on waterfront parcels shall additionally consider protection of the shoreline where there is erosion or the development is likely to cause erosion; degree of water dependency; preservation of significant natural vistas and points or avenues of views of the waterfront; provision of meaningful public access; and insurance of outstanding quality of design and construction to produce an environment that enhances its waterfront location.

The Commission will also consider whether the proposed application is consistent with the City's Municipal Coastal Program.

Characteristics and Condition of Coastal Resources at or Adjacent to the site:

Coastal Flood Hazard Area (Flood Zone): The project site is located within Special Flood Hazard Area (the area subject to inundation by the 1% annual chance flood (100-year flood)) Zone AE, as defined by FEMA Flood Insurance Rate Maps (FIRM) panels 09009C0441J and 09009C0442J effective July 8, 2013.

Developed Shorefront: The entire project site is located on and adjacent to highly urbanized/industrial waterfront in New Haven's Mill River District.

Island: The project site is located on Ball Island which is fully developed with industrial/commercial activities and surrounded along the perimeter by a steel bulkhead. The site bounded by the Mill River in the east, south, and west and by Grand Avenue in the north.

Nearshore Waters: The project site and proposed activities are located immediately adjacent to the Mill River. A steel bulkhead surrounds the island upon which the site is located.

Shorelands: The project site is located within the coastal boundary on a developed waterfront adjacent site.

Coastal Program Criteria	Comments
1. Potential adverse impacts on coastal resources and mitigation of such impacts	<i>The proposed changes to the originally approved site plan approval will not adversely impact coastal resources.</i>

2. Potential beneficial impacts	<i>The proposed revisions to the originally approved site plan will result in additional potentially contaminated soil (~3,000 CY) being permanently removed from the site, rather than stored on site, per the original approval.</i>
3. Identify any conflicts between the proposed activity and any goal or policy in the §22a-92, C.G.S. (CCMA)	<i>None.</i>
4. Will the project preclude development of water dependent uses on or adjacent to this site in the future?	<i>No. The site is appropriate for water-dependent use in the future, but that is not addressed in this application.</i>
5. Have efforts been made to preserve opportunities for future water-dependent development?	<i>No. The site is being remediated to meet industrial standards. The proposed project will not preclude future water-dependent development.</i>
6. Is public access provided to the adjacent waterbody or watercourse?	<i>No.</i>
7. Does this project include a shoreline flood and erosion control structure (i.e. breakwater, bulkhead, groin, jetty, revetment, riprap, seawall, placement of barriers to the flow of flood waters or movement of sediment along the shoreline)?	<i>No. The existing perimeter steel bulkhead will remain and will not be altered.</i>
8. Does this project include work below the Coastal Jurisdiction Line (i.e. location of topographical elevation of the highest predictable tide from 1983 to 2001)? New Haven CJL elevation is 4.6'.	<i>No.</i>

SITE PLAN REVIEW

The proposed revisions to the approved site plan for Parcel A (510A Grand Avenue) (and Parcel B (510 Grand Avenue)) have been reviewed by the Site Plan Review team with representatives from the Departments of City Plan, City Engineer, Building, Disabilities Services and Transportation, Traffic and Parking and have been found to meet the requirements of City ordinances, regulations, and standard details.

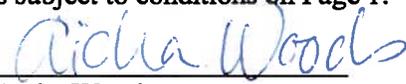
COASTAL FINDING:

Taking into consideration all of the above information, the City Plan Commission finds the proposed amendments consistent with all applicable goals and policies in Section 22a-92 of the Connecticut Coastal Management Act and incorporates as conditions or modifications all reasonable measures which would mitigate the adverse effects on coastal resources. The Commission therefore makes a finding of no impact on coastal resources and approval for a coastal permit to be issued.

ACTION

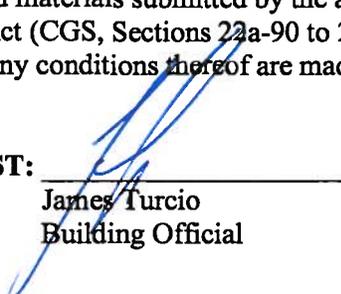
The City Plan Commission approves the submitted Site Plans subject to conditions on Page 1.

ADOPTED: January 22, 2020
Edward Mattison
Chair

ATTEST: 
Aicha Woods
Executive Director, City Plan Department

Coastal Site Plan Review, based upon the application and materials submitted by the applicant, was conducted in accordance with the Connecticut Coastal Management Act (CGS, Sections 22a-90 to 22a-112). The Building Official hereby receives the above written findings and any conditions thereof are made conditions of the Building Permit.

ADOPTED: January 22, 2020

ATTEST: 
James Turcio
Building Official

City of New Haven – Building Department

Demolition Permit

Permit #B-19-723



James Turcio
Building Official

CITY OF NEW HAVEN

Toni N. Harp, Mayor

BUILDING DEPARTMENT

200 Orange Street, 5th Floor

New Haven, CT 06510

Phone: (203) 946-8045 Fax: (203) 946-8049

www.cityofnewhaven.com



CITY OF NEW HAVEN
AN ECONOMIC DEVELOPMENT DEPT.

Michael Piscitelli

Acting Economic

Development Administrator

February 7, 2019

CORRECTED COPY

Historic Resources National Register Local Historic District No Historic Significance

CERTIFIED MAIL

RETURN RECEIPT REQUESTED 7003 1010 0004 4795 1200 AND FIRST CLASS MAIL

David Tropper, Manager
Haven River Properties LLC
84-25 Abingdon Road
Kew Gardens, NY 11415

Re: 510 A Grand Avenue (Station B Building on Parcel A) MBLU 179/0567/00802

Dear David Tropper:

**CONNECTICUT STATE BUILDING CODE §117
NOTICE OF IMMINENT DANGER, ORDER TO VACATE
AND POSTING OF UNSAFE STRUCTURE
(ORDER TO DEMOLISH)**

510 A Grand Avenue (Station B Building on Parcel A) MBLU 179/0567/00802

On January 9, 2019 and on January 28, 2019 inspections were conducted at 510 A Grand Avenue for the purposes of determining compliance with the Connecticut State Building Code as amended and the applicable referenced standards, adopted pursuant to the Connecticut General Statutes §29-252 (see attached engineer's report dated January 24, 2019). The Code and said standards are available for your inspection at this office. The inspections revealed the following condition(s) in violation of the Connecticut State Building Code which presents a **DANGER** of failure or collapse of the structure and endanger public safety: *bricks falling onto the sidewalk and roofing materials falling off of the roof onto the sidewalk and into the street. This constitutes a violation of the Connecticut State Building Code §117.*

PURSUANT TO CONNECTICUT STATE BUILDING CODE §117, THIS STRUCTURE IS HEREBY DEEMED UNSAFE AND ITS FURTHER USE AND/OR OCCUPANCY PROHIBITED BY THE BUILDING OFFICIAL. THIS STRUCTURE MUST BE **IMMEDIATELY** SECURED FROM FURTHER ENTRY. UNTIL FURTHER NOTICE, IT SHALL BE UNLAWFUL FOR ANY PERSON TO ENTER SUCH STRUCTURE EXCEPT UPON PERMISSION GRANTED BY THE BUILDING OFFICIAL; WHICH MAY BE GRANTED FOR THE PURPOSES OF MAKING REQUIRED REPAIRS OR DEMOLISHING THE STRUCTURE.

YOU ARE HEREBY ORDERED AS OWNER OF RECORD TO ENGAGE THE SERVICES OF A CONNECTICUT LICENSED DEMOLITION CONTRACTOR AT YOUR SOLE EXPENSE, OBTAIN THE REQUIRED DEMOLITION PERMIT FROM THIS OFFICE, AND DEMOLISH THE STRUCTURE THAT HAS SUFFERED COLLAPSE IN ACCORDANCE WITH THE CONNECTICUT STATE BUILDING CODE WITHIN **THIRTY (30) DAYS** UPON RECEIPT OF THIS NOTICE.

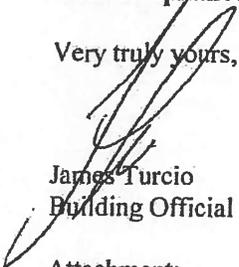
Please be advised that Connecticut State Building Code §116 requires that *within seven (7) days you notify me of your acceptance or rejection of this Order*. If you reject this Order, you will immediately be required to secure the requisite building permit from this office to restore the structure in accordance with the provisions of Connecticut State Building Code §116. You are hereby notified that you have the right to appeal this order pursuant to Connecticut General Statutes §29-266(b) to the municipal board of appeals or Connecticut General Statutes §29-266(c) in the absence of a municipal board of appeals. Variations or exemptions from the Connecticut State Building Code may be granted by the Connecticut State Building Inspector where strict compliance with the code would entail practical difficulty or unnecessary hardship, or is otherwise adjudged unwarranted pursuant to Connecticut General Statutes §29-254(b), provided that the intent of the law shall be observed and public welfare and safety be assured. Any application for a variation or exemption or equivalent or alternate compliance shall be filed with the local Building Official.

This is the only order you will receive. Be advised that if the Owner cannot be located, or refuses or is unable to expeditiously make the building or structure safe per order, the Building Official may order the employment of necessary labor and materials needed to make the premises temporarily safe up to and including demolition and recover the costs against the Owner as provided at law, pursuant to Connecticut General Statutes and State Building Code §117.4 and §117.5. The Building Official is further authorized to prosecute any violation of this order by requesting that legal counsel of the jurisdiction, or the Office of the State's Attorney, institute the appropriate proceeding at law. Any person who is convicted in a court of law of violating any provision of the Connecticut State Building Code or for failure to comply with the written order of a building inspector for the provision of additional exit facilities in a building, the repair or alteration of a building or the removal of a building or any portion thereof shall be fined not less than two hundred not more than one thousand dollars or imprisoned not more than six months or both per Connecticut State Building Code §114.3 and Connecticut General Statutes §29-254a and §29-394.

This office hopes to gain your cooperation and looks forward to working with you in the interest of building and life safety for a timely resolution of this serious matter. If you have any questions, please feel free to contact me at 203-946-8045.

This notice will be placed on the Land Records in the City Clerk's Office, and will not be removed until compliance is complete to the satisfaction of this office.

Very truly yours,


James Turcio
Building Official

Attachment:

— Spiegel Zamecnik & Shah, Inc. Engineer's Report dated January 24, 2019

cc: Judith Dicine, Supervisory Assistant State's Attorney, Connecticut Superior Court, Housing Matters
Robert Doyle, Fire Marshal
Frank D'Amore, Dep. Dir., Livable City Initiative Property Division
Alex Pullen, Acting City Assessor
Maurine Villani, Tax Collector
Alder Aaron Greenberg, Ward 8
City/Town Clerk

DISPLAY PERMIT IN A CONSPICUOUS PLACE ON THE PREMISES



City of New Haven

Building Department

200 Orange St. New Haven, CT 06510
Tel. (203) 946-8045 - Fax (203) 946-8049



Permit No. B-19-723

Construction Cost: \$468,000.00

DEMOLITION PERMIT

FEE PAID: \$14,060.00

DATE ISSUED: 6/6/2019

This certifies that HAVEN RIVER PROPERTIES LLC

has permission to erect, alter, or demolish a building on: 510 GRAND AV

No. of Units: 0

as follows: **APPLICATION TO DEMOLISH VACANT STATION B. CONTRACTOR: JOHN J BRENNAN CONSTRUCTION; ASBESTOS REMOVAL: ENCO ENVIRONMENTAL CONTRACTING AND DEMOLITION; DUMP SITE: MINERVA, HAKES, MODERN LANDFILL. NATIONAL REGISTER; DELAY WAIVED PER 9-29.a.3A. REVIEW COMPLETE BY: J TURCIO, BO. J TURCIO DEMOLITION OFFICER: JOSE ROMERO 203-946-7730**

provided that the person accepting this permit shall in every respect conform to the terms of the application therefore on file in this office, and to the provisions of regulations or ordinances relating to the Location, Inspection, Alteration and Construction of Buildings in the City of New Haven.

NOTE: The recipient of this permit accepts this permit on the condition that, as owner or as agent of the owner, he/she agrees to comply with all Building & Zoning Regulations of the City of New Haven & the State Statutes of the State of Connecticut regarding the use, occupancy & type of building or structure to be constructed, added to, demolished, or altered. The recipient also agrees that this building is to be located the proper distance from all street lines, all property yard lines & required distances from all other zones & is located in a zone in which the building & its use is allowed or has been approved. Additional conditions listed below:

Comments:

Current Use Group:

Proposed Use Group:

Construction Type:

Contractor Name: JOHN J BRENNAN CONSTRUCTION CO. Phone: (203) 395-2121

Owner Name: HAVEN RIVER PROPERTIES LLC Phone: (914) 705-7023

Address: 70 PLATT ROAD SHELTON CT 06484

Address: 84-25 ABINGDON RD KEW GARDENS NY 11415

All permits approved are subject to inspections performed by a representative of this office. Requests for inspections must be made at least 48 hours in advance, call (203) 946-8045.


James Turcio, Building Officer

6/6/2019

All Other Work and MEPs Require Separate Permits



City of New Haven

Building Department

200 Orange St. New Haven, CT 06510
Tel. (203) 946-8045 - Fax (203) 946-8049



Permit No. **B-19-723**

Construction Cost: **\$468,000.00**

DEMOLITION PERMIT

FEE PAID: **\$14,060.00**

DATE ISSUED: **6/6/2019**

This certifies that **HAVEN RIVER PROPERTIES LLC**

has permission to erect, alter, or demolish a building on: **510 GRAND AV**

No. of Units: **0**

as follows: ***510 A GRAND AVE* APPLICATION TO DEMOLISH VACANT STATION B. CONTRACTOR: STANDARD DEMOLITION SERVICES INC CONSTRUCTION; ASBESTOS REMOVAL: BESTECH INC. OF CT; DUMP SITE: MINERVA, HAKES, MODERN LANDFILL. NATIONAL REGISTER; DELAY WAIVED PER 9-29.a.3A. REVIEW COMPLETE BY: J TURCIO, BO. J TURCIO DEMOLITION OFFICER: JOSE ROMERO 203-946-7730**

provided that the person accepting this permit shall in every respect conform to the terms of the application therefore on file in this office, and to the provisions of regulations or ordinances relating to the Location, Inspection, Alteration and Construction of Buildings in the City of New Haven.

NOTE: The recipient of this permit accepts this permit on the condition that, as owner or as agent of the owner, he/she agrees to comply with all Building & Zoning Regulations of the City of New Haven & the State Statutes of the State of Connecticut regarding the use, occupancy & type of building or structure to be constructed, added to, demolished, or altered. The recipient also agrees that this building is to be located the proper distance from all street lines, all property yard lines & required distances from all other zones & is located in a zone in which the building & its use is allowed or has been approved. Additional conditions listed below:

Comments:

Current Use Group:

Proposed Use Group:

Construction Type:

Contractor Name: **STANDARD DEMOLITION SERVICES INC**

Phone: **(203) 380-8300**

Owner Name: **HAVEN RIVER PROPERTIES LLC**

Phone: **(914) 705-7023**

Address: **30 NUTMEG DR**

TRUMBULL

CT

06611

Address: **84-25 ABINGDON RD**

KEW GARDENS

NY

11415

All permits approved are subject to inspections performed by a representative of this office. Requests for inspections must be made at least 48 hours in advance, call (203) 946-8045.

James Turcio, Building Official

6/6/2019

All Other Work and MEPs Require Separate Permits

CTDPH – Asbestos Abatement Notifications



**STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH
ASBESTOS ABATEMENT NOTIFICATION FORM**

FOR STATE USE

Return Completed Form and Fee to: DPH, 410 Capitol Ave, MS 12 AIR
P O Box 340308 Hartford, CT 06134-0308

Post Mark Date	
Check No.	
Check Amount	
Transmittal No.	
Record ID	

1. TYPE OF NOTIFICATION

A. NEW B. BLANKET C. CANCELLATION D. REVISED E. EMERGENCY F. POSTPONED

REVISION # _____ ITEMS REVISED _____

Describe Emergency _____

2. ABATEMENT CONTRACTOR

ENCO Environmental Contracting & Demolition, LLC LICENSE # 786

CONTR_ADDRESS 70 W Liberty Street

CONTR_CITY Waterbury C_CONTACT Richard Shultz

CONTR_STATE CT C_ZIP 06706 C_PHONE 203-754-5959

3. FACILITY OWNER NAME

Haven River Properties

OWNER_ADDRESS 115-10 Queens Blvd Suite LL1

OWNER_CITY Forest Hills OWNER_CONTACT Mr. David Trooper

OWNER_STATE NY OWNER-ZIP 11375 OWNER_PHONE 917-705-7023

4. PROJECT ADDRESS (NAME)

Old English Station B

ADDRESS 2 510A Grand Avenue

PROJECT CITY New Haven

PROJECT STATE CT PROJECT_ZIP 06511 PROJECT_CONTACT _____

5A. ABATEMENT START DATE

5B. ABATEMENT END DATE

REVISED START 4/1/2019 REVISED END 5/31/2019

6. ONLY FOR PROJECTS OF 160 SQUARE FEET OR GREATER

TOTAL COST _____

6A. 1% of TOTAL COST _____ plus \$100 (Notification Fee Due)

6B. FOR REVISIONS, ADDITIONAL COST _____ ADDITIONAL 1% FEE _____ TOTAL PAID to date \$0.00

7. USE OF FACILITY

A. SCHOOL D. OFFICE G. RELIGIOUS

B. PUBLIC E. COLLEGE H. RESIDENTIAL, # UNITS _____

C. MANUFACTURING F. COMMERCIAL I. OTHER, SPECIFY _____

8. BUILDING DATA

SQ FT 25000 AGE 129 NUMBER OF FLOORS 1 w/mezz

9. ABATEMENT CLASSIFICATION

RENOVATION DEMOLITION ORDERED DEMOLITION

(ATTACH ORDER OF DEMOLITION)

10. ABATEMENT TECHNIQUE

A. FULL CONTAINMENT WITH NEG AIR B. ALTERNATIVE WORK PRACTICE

If AWP, Name of Project Designer Allsa Werst (sent in) PD Lic # 343

C. EXTERIOR ABATEMENT D. SPOT REPAIR (>25 SF)

11. ABATEMENT METHOD

12. TYPE OF DECONTAMINATION SYSTEM

A. REMOVAL A. CONTIGUOUS

B. ENCAPSULATION B. REMOTE

C. ENCLOSURE C. BOTH

Has contractor provided EPA with a ten day or emergency notification ? YES NO



Phone (860) 509-7367 / Fax (860) 509-7378
410 Capitol Avenue, MS 12 AIR PO BOX 340308
Hartford, CT 06134-0308



ADDRESS 510 Grand Ave

CITY/TOWN

New Haven

13. TYPE AND AMOUNT OF ASBESTOS CONTAINING MATERIAL TO BE ABATED

FRIABLE MATERIAL (report in square footage)

A. Sprayed/Troweled on 800SF E. Duct Insul _____
 B. Boiler Insulation _____ F. Ceiling Tiles _____
 C. Tank Insulation 125SF G. Other (Specify) _____
 D. Breeching Insulation _____ Other Friable (Specify) _____
 Other Friable damaged caulk 940SF Other Friable (Specify) _____

SPECIFY

PIPE INSULATION: Measure outside diameter (OD) of pipe, multiply the length of pipe (linear feet) times the CF to report total pipe insulation in square feet (add all SF quantities below)

Conversion Factor (*CF)

OD	QTY LF	x CF	SQ FT
6"	253	1.57	397.21
8"	250	2.1	525
16"	320	4.19	1340.8

Total Column 1 **2263.01**

OD	QTY LF	x CF	SQ FT
			0
			0
			0

Total Column 2 **0**

H. Pipe Insulation SF

2263.01

NONFRIABLE CATEGORY 1

I. Floor Coverings/Tiles 2290SF
 J. Roofing, Specify Galbestos 400SF/12000SF8eld&flash
 K. Packings, Gaskets flex cloth 3SF/ doorgasket 5LF
 Other NF _____

NONFRIABLE CATEGORY 2

L. Transite board Transite at roof 4800 SF
 M. Other Nonfriable SRJC 700 SF
 N. Other NF, Specify Circuit box insulation 10SF
 Other NF, Specify glaze 84 windows/caulk 1778 LF

14. WASTE HAULER (list up to 3)

Hauler 1 Name	<u>USA Hauling & Recycling</u>	Hauler 2 Name	<u>TransWaste</u>
Hauler 1 Address	<u>184 Municipal Road</u>	Hauler 2 Address	<u>3 Barker Drive</u>
Hauler 1 City	<u>Waterbury</u>	Hauler 2 City	<u>Wallingford</u>
Hauler 1 State,Zip	<u>CT 06708</u>	Hauler 2 State,Zip	<u>CT, 06492</u>
Hauler 1 Contact	<u>Dispatch (203)-596-8913</u>	Hauler 2 Contact	<u>Cindy DeVegea 203-250-1000</u>
Hauler 3 Name	_____		
Hauler 3 Address	_____		
Hauler 3 City	_____		
Hauler 3 State,Zip	_____		
Hauler 3 Contact	_____		

15. LANDFILL (list up to 3)

Landfill 1 Name	<u>Minerva Enterprises, LLC</u>	Landfill 2 Name	<u>Hakes Landfill</u>
Landfill 1 Address	<u>8955 Minerva Road S.E.</u>	Landfill 2 Address	<u>4376 Manning Ridge Road</u>
Landfill 1 City	<u>Waynesburg</u>	Landfill 2 City	<u>Painted Post</u>
Landfill 1 State,Zip	<u>Ohio 44688</u>	Landfill 2 State,Zip	<u>NY, 14870</u>
Landfill 1 Contact	<u>Steve Chandler VP (330)-866-3435</u>	Landfill 2 Contact	<u>607-937-6044</u>
Landfill 3 Name	<u>Modern Landfill</u>	Form Prepared by (printed)	<u>Richard Shultz</u>
Landfill 3 Address	<u>4400 Mount Pisgah Road</u>	Signature	_____
Landfill 3 City	<u>York</u>		
Landfill 3 State,Zip	<u>PA, 17402</u>		
Landfill 3 Contact	<u>717-246-4615</u>		

Richard Shultz

Title Operations

NOTIFICATION OF DEMOLITION AND RENOVATION

Operator Project #	Postmark	Date Received	Notification #	
I. Type of Notification (O=Original R=Revised C=Canceled) <input type="radio"/>				
II. FACILITY INFORMATION (Identify owner, removal contractor, and other operator)				
OWNER NAME: Haven River Properties				
Address: 115-10 QUEENS BLVD STE LL1				
City: FOREST HILLS	State: NY	Zip: 11375		
Contact: Mr. David Tropper		Tel: 917-705-7023		
REMOVAL CONTRACTOR: ENCO Environmental Contracting & Demolition, LLC				
Address: 70 West Liberty Street				
City: Waterbury	State: CT	Zip: 06706		
Contact: Richard Shultz/ Yuriy Stolyar		Tel: 203-754-5959		
OTHER OPERATOR:				
Address:				
City:	State:	Zip:		
Contact:		Tel:		
III. TYPE OF OPERATION (D=Demo O= Ordered Demo R=Renovation E=Emer. Renovation) <input checked="" type="radio"/>				
IV. IS ASBESTOS PRESENT? (Yes/No) YES				
V. FACILITY DESCRIPTION (Include building name, number and floor or room number)				
Bldg. Name: ENGLISH STATION STATION B				
Address: 510A GRAND AVENUE				
City: NEW HAVEN	State: CT	County: NEW HAVEN		
Site Location: 510 GRAND AVENUE NEW HAVEN, CT				
Building Size: 25,000	# of Floors: 1 w/mezz	Age In Years: 129		
Present Use: VACANT	Prior Use: POWER PLANT			
VI. PROCEDURE, INCLUDING ANALYTICAL METHOD, IF APPROPRIATE, USED TO DETECT THE PRESENCE OF ASBESTOS MATERIAL: Asbestos inspection by CT licensed inspector with PLM sample analysis				
VII. APPROXIMATE AMOUNT OF ASBESTOS INCLUDING: 1. Regulated ACM to be Removed 2. Category I ACM Not Removed 3. Category II ACM Not Removed	RACM To Be Removed	Nonfriable Asbestos Material Not To Be Removed		Indicate Unit of Measurement Below UNIT
		Category I	Category II	
Pipes	Refer to tables attached			Ln Ft: Ln M:
Surface Area	Refer to tables attached			Sq Ft: Sq M:
Vol RACM Off Facility Component				Cu Ft: Cu M:
VIII. SCHEDULED DATES ASBESTOS REMOVAL (MM/DD/YY) Start: 4/1/2019			Complete: 5/31/2019	
IX. SCHEDULED DATES DEMO/RENOVATION (MM/DD/YY) Start: 4/1/2019			Complete: 5/31/2019	

X. DESCRIPTION OF PLANNED DEMOLITION OR RENOVATION WORK, AND METHOD(S) TO BE USED:

Full containments/ AWP applied to State of CT DPH/ Restricted area for exterior

XI. DESCRIPTION OF WORK PRACTICES AND ENGINEERING CONTROLS TO BE USED TO PREVENT EMISSIONS OF ASBESTOS AT THE DEMOLITION OR RENOVATION SITE:

Full containments using Wet methods/HEPA machines/ AWP using wet methods and HEPA equip for cleaning/ Setting up restricted area during demolition using wet methods

XII. WASTE TRANSPORTER #1

Name: USA Hauling & Recycling

Address: 184 Municipal Rd.

City: Waterbury

State: CT

Zip: 06708

Contact Person: Lary Pincince

Tel: (203) 596-8913

WASTE TRANSPORTER #2

Name: TransWaste

Address: 3 Barker Drive

City: Wallingford

State: CT

Zip: 06492

Contact Person: John Barry or Cindy DeVegeia

Tel: 203-250-1000

XIII. WASTE DISPOSAL SITE

Name: Minerva Enterprises, LLC

Address: 8955 Minerva Rd., S.E.

City: Waynesburg

State: OH

Zip: 44688

Tel: (330) 866-3435

XIV. IF DEMOLITION ORDERED BY A GOVERNMENT AGENCY, PLEASE IDENTIFY THE AGENCY BELOW:

Name:

Title:

Authority:

Date of Order (MM/DD/YY):

Date Ordered to Begin (MM/DD/YY):

XV. FOR EMERGENCY RENOVATIONS:

Date and Hour of Emergency (MM/DD/YY):

Description of the sudden unexpected event:

Explanation of how the event caused unsafe conditions or would cause equipment damage or an unreasonable financial burden:

XVI. DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND OR PREVIOUSLY NONFRIABLE ASBESTOS MATERIAL BECOMES CRUMBLED, PULVERIZED, OR REDUCED TO POWDER:

State of CT Licensed Asbestos Project Monitoring company to oversee the project and make field adjustments

XVII. I CERTIFY THAT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF THIS REGULATION (40 CFR PART 61, SUBPART M) WILL BE ON-SITE DURING THE DEMOLITION OR RENOVATION, AND EVIDENCE THAT THE REQUIRED TRAINING HAS BEEN ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE FOR INSPECTION DURING NORMAL BUSINESS HOURS.



(Signature of Owner/Operator)

3/18/2019

(Date)

XVIII. I CERTIFY THAT THE ABOVE INFORMATION IS CORRECT.



(Signature of Owner/Operator)

3/18/2019

(Date)



STATE OF CONNECTICUT DEPARTMENT OF PUBLIC HEALTH

State Use Only

ASBESTOS ABATEMENT NOTIFICATION FORM

Post Mark _____
Check No _____
Check Amt _____
Trans _____
Rec # _____

1. TYPE OF NOTIFICATION

- A. New B. Blanket C. Cancellation D. Revised E. Emergency F. Postponed
Revision # 2 ITEMS REVISED 5.B

Explain Emergency 10 days waived per Steve Dahlem

2. ABATEMENT CONTRACTOR

C_Name BESTECH INC. OF CONNECTICUT License # 16
C_Address 25 PINNEY STREET
C_City ELLINGTON C_Contact JAMES NEWBURY
C_State CT C_Zipcode 06029 C_Phone (860) 896-1000

3. FACILITY OWNER

O_Name Haven River Properties
O_Address 115-10 Queens Blvd, Suite LL1
O_City Forest Hills O_Contact David Tropper
O_State NY O_Zipcode 11375 O_Phone (917) 705-7023

4. PROJECT

Name of Facility Station B
P_Address 510 A Grand Avenue
P_City New Haven
P-State CT P_Zipcode 06511 P_Contact

5A. ABATEMENT START DATE 05/20/19 5B. ABATEMENT END DATE 6/30/19
REVISED START REVISED END 8/15/19

6. ONLY FOR PROJECTS OF 160 SQUARE FEET OR GREATER TOTAL COST

6A. 1% of TOTAL COST plus \$100 6B. =(Notification Fee Due)

FOR REVISIONS, ADDITIONAL COST Additional 1% Fee Owed Fees Paid to Date

- 7. FACILITY USE A. School (K-12) B. Public C. Manufacturing D. Office E. College F. Commercial G. Religious H. Residential I. Other, Specify # of Units

8. BUILDING DATA Sq. Ft. 25,000 Age 129 Number Floors 1

9. CLASSIFICATION Renovation Demolition Ordered Demolition (ATTACH ORDER)

10. TECHNIQUE A. Full Containment with Neg Pressure B. Alternative Work Practice (pre-approved) C. Exterior D. Spot Repair

11. METHOD A. Removal B. Encapsulation C. Enclosure

12. TYPE of DECONTAMINATION SYSTEM A. Contiguous B. Remote C. Both

HAS CONTRACTOR PROVIDED US EPA with A TEN WORKING DAY or EMERGENCY NOTIFICATION? YES NO

ADDRESS 510 Grand Ave

CITY/TOWN New Haven

13. TYPE AND AMOUNT OF ASBESTOS CONTAINING MATERIAL TO BE ABATED

FRIABLE MATERIAL (report in square footage)

A. Sprayed/Troweled on 800 E. Duct Insul _____
 B. Boiler Insulation _____ F. Ceiling Tiles _____
 C. Tank Insulation 125 G. Other (Specify) _____
 D. Breeching Insulation _____ Other Friable, Specify _____
 Other Friable damaged caulk 940 Other Friable, Specify _____

(SPECIFY) _____

PIPE INSULATION: Measure outside diameter (OD) of pipe, multiply the length of pipe (linear feet) times the CF to report total pipe insulation in square feet (add all SF quantities below) Conversion Factor

OD	QTY LF	x	CF	=	SQ FT
6	253		1.57		397
8	250		2.1		525
16	320		4.19		1,341

OD	QTY LF	x	CF	=	SQ FT

Total Columns 2,263 H. Pipe Insulation SF

NONFRIABLE CATEGORY 1

I. Floor Coverings/Tiles 2290 sf
 J. Roofing, Specify Galbestos 400 sf 12,000 field
 K. Packings, Gaskets _____
 Other NF flex doth 35 sf doorgasket 5 LF

NONFRIABLE CATEGORY 2

L. Transite board 4,800
 M. Other Nonfriable SRJC 700 SF
 N. Other NF, Specify 10 sf Circuit box insul
 Other NF, Specify glaze 84 windows

List other NF (M) caulk 1778 LF

14. HAULER *list up to 3 sites

H1Name TRI-S ENVIRONMENTAL SERVICES
 H1Address 25 PINNEY STREET
 H1City ELLINGTON
 H1State,Zip CT 06029
 H1Contact MIKE KOPESKI
 H3Name _____
 H3Address _____
 H3City _____
 H3State,Zip _____
 H3Contact _____

H2Name RED TECHNOLOGIES, LLC
 H2Address 173 PICKERING STREET
 H2City PORTLAND
 H2State,Zip CT 06480
 H2Contact MARK BARNES

15. WASTE DISPOSAL SITE *list up to 3 sites

L1Name MINERVA ENTERPRISES
 L1Address 8955 MINERVA ROAD
 L1City WAYNESBURG
 L1State,Zip OH 44688
 L1Contact BRUCE SULLIVAN
 L3Name _____
 L3Address _____
 L3City _____
 L3State,Zip _____
 L3Contact _____

L2Name _____
 L2Address _____
 L2City _____
 L2State,Zip _____
 L2Contact _____

Form Prepared by (printed)

Robert Sullivan

Signature



Save Form

Print Form

Clear Form

NOTIFICATION OF DEMOLITION AND RENOVATION

Operator Project #	Postmark	Date Received	Notification #		
I. Type of Notification (O=Original R=Revised C=Canceled) R 2					
II. FACILITY INFORMATION (Identify owner, removal contractor, and other operator)					
OWNER NAME: Haven Rivers Properties					
Address: 115-10 Queens Blvd Ste LL1					
City: Forest Hills	State: NY	Zip: 11375			
Contact: David Tropper		Tel: 917-705-7023			
REMOVAL CONTRACTOR: Bestech Inc. of Connecticut					
Address: 25 Pinney Street					
City: Ellington	State: CT	Zip: 06029			
Contact: Kenneth Strickland		Tel: 860-896-1000			
OTHER OPERATOR:					
Address:					
City:	State:	Zip:			
Contact:		Tel:			
III. TYPE OF OPERATION (D=Demo O= Ordered Demo R=Renovation E=Emer. Renovation) Demo					
IV. IS ASBESTOS PRESENT? (Yes/No) Yes					
V. FACILITY DESCRIPTION (Include building name, number and floor or room number)					
Bldg. Name: Station B					
Address: 510A Grand Avenue					
City: New Haven	State: CT	County: New Haven			
Site Location: 510 Grand Ave., New Haven, CT - Station B					
Building Size: 25,000 SF	# of Floors: 1	Age in Years: 129			
Present Use: Vacant	Prior Use: Power Plant				
VI. PROCEDURE, INCLUDING ANALYTICAL METHOD, IF APPROPRIATE, USED TO DETECT THE PRESENCE OF ASBESTOS MATERIAL: Licensed inspector performed inspection, samples analyzed by PLM.					
VII. APPROXIMATE AMOUNT OF ASBESTOS INCLUDING: 1. Regulated ACM to be Removed 2. Category I ACM Not Removed 3. Category II ACM Not Removed	RACM To Be Removed	Nonfriable Asbestos Material Not To Be Removed		Indicate Unit of Measurement Below	
		Category I	Category II	UNIT	
Pipes	SEE ATTACHED			Ln Ft:	Ln M:
Surface Area				Sq Ft:	Sq M:
Vol RACM Off Facility Component				Cu Ft:	Cu M:
VIII. SCHEDULED DATES ASBESTOS REMOVAL (MM/DD/YY) Start: 05/20/2019				Complete: 08/15/2019	
IX. SCHEDULED DATES DEMO/RENOVATION (MM/DD/YY) Start: 05/20/2019				Complete: 08/15/2019	

X. DESCRIPTION OF PLANNED DEMOLITION OR RENOVATION WORK, AND METHOD(S) TO BE USED: Build a full containment with negative pressure / CT AWP / Restricted area for exterior

XI. DESCRIPTION OF WORK PRACTICES AND ENGINEERING CONTROLS TO BE USED TO PREVENT EMISSIONS OF ASBESTOS AT THE DEMOLITION OR RENOVATION SITE:

Full negative pressure containment with attached decon, wet methods/ HEPA machines

XII. WASTE TRANSPORTER #1

Name: TRI-S Environmental Services

Address: 25 Pinney Street

City: Ellington

State: CT

Zip: 06029

Contact Person: Michael Kopeski

Tel: 860-875-2110

WASTE TRANSPORTER #2

Name:

Address:

City:

State:

Zip:

Contact Person:

Tel:

XIII. WASTE DISPOSAL SITE

Name: Minerva Enterprises Landfill

Address: 8955 Minerva Road SE

City: Waynesburg

State: OH

Zip: 44688

Tel: 330-866-3435

XIV. IF DEMOLITION ORDERED BY A GOVERNMENT AGENCY, PLEASE IDENTIFY THE AGENCY BELOW:

Name:

Title:

Authority:

Date of Order (MM/DD/YY):

Date Ordered to Begin (MM/DD/YY):

XV. FOR EMERGENCY RENOVATIONS:

Date and Hour of Emergency (MM/DD/YY):

Description of the sudden unexpected event:

Explanation of how the event caused unsafe conditions or would cause equipment damage or an unreasonable financial burden:

XVI. DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND OR PREVIOUSLY NONFRIABLE ASBESTOS MATERIAL BECOMES CRUMBLED, PULVERIZED, OR REDUCED TO POWDER:

Seal off area and notify asbestos consultant.

XVII. I CERTIFY THAT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF THIS REGULATION (40 CFR PART 61, SUBPART M) WILL BE ON-SITE DURING THE DEMOLITION OR RENOVATION, AND EVIDENCE THAT THE REQUIRED TRAINING HAS BEEN ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE FOR INSPECTION DURING NORMAL BUSINESS HOURS.



(Signature of Owner/Operator)

6/30/2019

(Date)

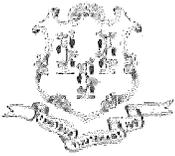
XVIII. I CERTIFY THAT THE ABOVE INFORMATION IS CORRECT:



(Signature of Owner/Operator)

6/30/2019

(Date)



STATE OF CONNECTICUT DEPARTMENT OF PUBLIC HEALTH

State Use Only

ASBESTOS ABATEMENT NOTIFICATION FORM

Post Mark _____
Check No _____
Check Amt _____
Trans _____
Rec # _____

1. TYPE OF NOTIFICATION

- A. New B. Blanket C. Cancellation D. Revised E. Emergency F. Postponed
Revision # 4 ITEMS REVISED 5.B

Explain Emergency 10 days waived per Steve Dahlem

2. ABATEMENT CONTRACTOR

C_Name BESTECH INC. OF CONNECTICUT License # 16
C_Address 25 PINNEY STREET
C_City ELLINGTON C_Contact JAMES NEWBURY
C_State CT C_Zipcode 06029 C_Phone (860) 896-1000

3. FACILITY OWNER

O_Name Haven River Properties
O_Address 115-10 Queens Blvd, Suite LL1
O_City Forest Hills O_Contact David Tropper
O_State NY O_Zipcode 11375 O_Phone (917) 705-7023

4. PROJECT

Name of Facility Station B
P_Address 510 A Grand Avenue
P_City New Haven
P-State CT P_Zipcode 06511 P_Contact

5A. ABATEMENT START DATE 05/20/19 5B. ABATEMENT END DATE 6/30/19

REVISED START REVISED END 9/30/19

6. ONLY FOR PROJECTS OF 160 SQUARE FEET OR GREATER

TOTAL COST

6A. 1% of TOTAL COST plus \$100 6B. =(Notification Fee Due)

FOR REVISIONS, ADDITIONAL COST Additional 1% Fee Owed Fees Paid to Date

7. FACILITY USE

- A. School (K-12) B. Public C. Manufacturing D. Office E. College F. Commercial G. Religious H. Residential I. Other, Specify # of Units

8. BUILDING DATA

Sq. Ft. 25,000 Age 129 Number Floors 1

9. CLASSIFICATION

Renovation Demolition Ordered Demolition (ATTACH ORDER)

10. TECHNIQUE

- A. Full Containment with Neg Pressure C. Exterior B. Alternative Work Practice (pre-approved) D. Spot Repair

11. METHOD

- A. Removal B. Encapsulation C. Enclosure

12. TYPE of DECONTAMINATION SYSTEM

- A. Contiguous B. Remote C. Both

HAS CONTRACTOR PROVIDED US EPA with A TEN WORKING DAY or EMERGENCY NOTIFICATION? YES NO

ADDRESS 510 Grand Ave

CITY/TOWN New Haven

13. TYPE AND AMOUNT OF ASBESTOS CONTAINING MATERIAL TO BE ABATED

FRIABLE MATERIAL (report in square footage)

A. Sprayed/Troweled on 800 E. Duct Insul _____
 B. Boiler Insulation _____ F. Ceiling Tiles _____
 C. Tank Insulation 125 G. Other (Specify) _____
 D. Breeching Insulation _____ Other Friable, Specify _____
 Other Friable damaged caulk 940 Other Friable, Specify _____

(SPECIFY) _____

PIPE INSULATION: Measure outside diameter (OD) of pipe, multiply the length of pipe (linear feet) times the CF to report total pipe insulation in square feet (add all SF quantities below) Conversion Factor

OD	QTY LF	x CF	= SQ FT
6	253	1.57	397
8	250	2.1	525
16	320	4.19	1,341

OD	QTY LF	x CF	= SQ FT

Total Columns 2,263

H. Pipe Insulation SF

NONFRIABLE CATEGORY 1

I. Floor Coverings/Tiles 2290 sf
 J. Roofing, Specify Galbestos 400 sf 12,000 field
 K. Packings, Gaskets _____
 Other NF flex doth 35 sf doorgasket 5 LF

NONFRIABLE CATEGORY 2

L. Transite board 4,800
 M. Other Nonfriable SRJC 700 SF
 N. Other NF, Specify 10 sf Circuit box insul
 Other NF, Specify glaze 84 windows

List other NF (M) caulk 1778 LF

14. HAULER *list up to 3 sites

H1Name TRI-S ENVIRONMENTAL SERVICES
 H1Address 25 PINNEY STREET
 H1City ELLINGTON
 H1State,Zip CT 06029
 H1Contact MIKE KOPESKI
 H3Name _____
 H3Address _____
 H3City _____
 H3State,Zip _____
 H3Contact _____

H2Name RED TECHNOLOGIES, LLC
 H2Address 173 PICKERING STREET
 H2City PORTLAND
 H2State,Zip CT 06480
 H2Contact MARK BARNES

15. WASTE DISPOSAL SITE *list up to 3 sites

L1Name MINERVA ENTERPRISES
 L1Address 8955 MINERVA ROAD
 L1City WAYNESBURG
 L1State,Zip OH 44688
 L1Contact BRUCE SULLIVAN
 L3Name _____
 L3Address _____
 L3City _____
 L3State,Zip _____
 L3Contact _____

L2Name _____
 L2Address _____
 L2City _____
 L2State,Zip _____
 L2Contact _____

Form Prepared by (printed)

Kenneth Strickland

Signature

Kenneth Strickland

Digitally signed by Kenneth Strickland
DN: cn=Kenneth Strickland, o=Bestech
Inc. of CT, ou,
email=kstrickland@bestechct.com, c=US
Date: 2019.09.09 09:37:44 -04'00'

Save Form

Print Form

Clear Form

NOTIFICATION OF DEMOLITION AND RENOVATION

Operator Project #	Postmark	Date Received	Notification #	
I. Type of Notification (O=Original R=Revised C=Canceled) R 4				
II. FACILITY INFORMATION (Identify owner, removal contractor, and other operator)				
OWNER NAME: Haven Rivers Properties				
Address: 115-10 Queens Blvd Ste LL1				
City: Forest Hills	State: NY	Zip: 11375		
Contact: David Tropper		Tel: 917-705-7023		
REMOVAL CONTRACTOR: Bestech Inc. of Connecticut				
Address: 25 Pinney Street				
City: Ellington	State: CT	Zip: 06029		
Contact: Kenneth Strickland		Tel: 860-896-1000		
OTHER OPERATOR:				
Address:				
City:	State:	Zip:		
Contact:		Tel:		
III. TYPE OF OPERATION (D=Demo O= Ordered Demo R=Renovation E=Emer. Renovation) Demo				
IV. IS ASBESTOS PRESENT? (Yes/No) Yes				
V. FACILITY DESCRIPTION (Include building name, number and floor or room number)				
Bldg. Name: Station B				
Address: 510A Grand Avenue				
City: New Haven	State: CT	County: New Haven		
Site Location: 510 Grand Ave., New Haven, CT - Station B				
Building Size: 25,000 SF	# of Floors: 1	Age in Years: 129		
Present Use: Vacant	Prior Use: Power Plant			
VI. PROCEDURE, INCLUDING ANALYTICAL METHOD, IF APPROPRIATE, USED TO DETECT THE PRESENCE OF ASBESTOS MATERIAL: Licensed inspector performed inspection, samples analyzed by PLM.				
VII. APPROXIMATE AMOUNT OF ASBESTOS INCLUDING: 1. Regulated ACM to be Removed 2. Category I ACM Not Removed 3. Category II ACM Not Removed	RACM To Be Removed	Nonfriable Asbestos Material Not To Be Removed		Indicate Unit of Measurement Below
		Category I	Category II	UNIT
Pipes	SEE ATTACHED			Ln Ft: Ln M:
Surface Area				Sq Ft: Sq M:
Vol RACM Off Facility Component				Cu Ft: Cu M:
VIII. SCHEDULED DATES ASBESTOS REMOVAL (MM/DD/YY) Start: 05/20/2019		Complete: 09/30/2019		
IX. SCHEDULED DATES DEMO/RENOVATION (MM/DD/YY) Start: 05/20/2019		Complete: 09/30/2019		

X. DESCRIPTION OF PLANNED DEMOLITION OR RENOVATION WORK, AND METHOD(S) TO BE USED: Build a full containment with negative pressure / CT AWP / Restricted area for exterior

XI. DESCRIPTION OF WORK PRACTICES AND ENGINEERING CONTROLS TO BE USED TO PREVENT EMISSIONS OF ASBESTOS AT THE DEMOLITION OR RENOVATION SITE:

Full negative pressure containment with attached decon, wet methods/ HEPA machines

XII. WASTE TRANSPORTER #1

Name: TRI-S Environmental Services

Address: 25 Pinney Street

City: Ellington

State: CT

Zip: 06029

Contact Person: Michael Kopeski

Tel: 860-875-2110

WASTE TRANSPORTER #2

Name:

Address:

City:

State:

Zip:

Contact Person:

Tel:

XIII. WASTE DISPOSAL SITE

Name: Minerva Enterprises Landfill

Address: 8955 Minerva Road SE

City: Waynesburg

State: OH

Zip: 44688

Tel: 330-866-3435

XIV. IF DEMOLITION ORDERED BY A GOVERNMENT AGENCY, PLEASE IDENTIFY THE AGENCY BELOW:

Name:

Title:

Authority:

Date of Order (MM/DD/YY):

Date Ordered to Begin (MM/DD/YY):

XV. FOR EMERGENCY RENOVATIONS:

Date and Hour of Emergency (MM/DD/YY):

Description of the sudden unexpected event:

Explanation of how the event caused unsafe conditions or would cause equipment damage or an unreasonable financial burden:

XVI. DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND OR PREVIOUSLY NONFRIABLE ASBESTOS MATERIAL BECOMES CRUMBLED, PULVERIZED, OR REDUCED TO POWDER:

Seal off area and notify asbestos consultant.

XVII. I CERTIFY THAT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF THIS REGULATION (40 CFR PART 61, SUBPART M) WILL BE ON-SITE DURING THE DEMOLITION OR RENOVATION, AND EVIDENCE THAT THE REQUIRED TRAINING HAS BEEN ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE FOR INSPECTION DURING NORMAL BUSINESS HOURS.

Kenneth Strickland

Digitally signed by Kenneth Strickland
DN: cn=Kenneth Strickland, o=Bestech Inc. of CT, ou,
email=kstrickland@bestechct.com, c=US
Date: 2019.09.09 09:40:02 -04'00'

(Signature of Owner/Operator)

09/09/2019

(Date)

XVIII. I CERTIFY THAT THE ABOVE INFORMATION IS CORRECT:

Kenneth Strickland

Digitally signed by Kenneth Strickland
DN: cn=Kenneth Strickland, o=Bestech Inc. of CT, ou,
email=kstrickland@bestechct.com, c=US
Date: 2019.09.09 09:40:13 -04'00'

(Signature of Owner/Operator)

09/09/2019

(Date)

CTDPH – Alternative Work Practice

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

Raul Pino, M.D., M.P.H.
Commissioner



Ned Lamont
Governor
Susan Bysiewicz
Lt. Governor

Environmental Health Section

March 29, 2019

Ms. Alisa Werst
HRP Associates, Inc.
197 Scott Swamp Road
Farmington, CT 06032-3149

Re: Application for Approval of Alternative Work Practice
English Station, Station B, 510A Grand Avenue, New Haven, CT

Dear Ms. Werst:

This letter is provided in response to your revised Application for Approval of Alternative Work Practice (hereafter "Application") received by the State of Connecticut Department of Public Health (hereafter "Department") on March 29, 2019. The revised Application requests approval for an alternative work practice (hereafter "AWP") for the removal of asbestos-containing and asbestos contaminated materials located within the referenced facility. The Application specifically applies to the removal of damaged thermal system insulation; vinyl asbestos flooring; joint compound; plaster skim coat; interior windows; wire wrap debris; tank insulation; window glazing and associated debris; roofing materials; transite siding; and repointing tar on the south building wall. The measured quantities of these materials are contained in the Application. The Application details the following two scenarios for the abatement of these asbestos-containing materials:

Scenario 1: Areas 1-3 including damaged TSI; wire wrap debris; tank insulation; vinyl flooring; joint compound; interior windows; plaster skim coat; and linoleum:

Based upon the information provided in your Application and based upon the Department's understanding that this scenario requests a variance from **Subsections 19a-332a-5(e)** of the Regulations of Connecticut State Agencies (hereafter "RCSA"), approval for this scenario is granted. This approval is additionally based upon the March 29, 2019 determination by **Mr. Thomas Battles, P.E.** that these areas of Station B are safe to enter for abatement work.



Phone: (860) 509-7367 • Fax: (860) 509-7378
Telecommunications Relay Service 7-1-1
410 Capitol Avenue, MS 12 AIR, P.O. Box 340308
Hartford, Connecticut 06134-0308
www.ct.gov/dph

Affirmative Action/Equal Opportunity Employer



In strict accordance with your Application, and in lieu of the requirements of **Subsection 19a-332a-5 (e)** of the RCSA, the following work practices shall be used:

1. All asbestos abatement work for this scenario shall be performed with the full time on-site review of a Department licensed Project Monitor (hereafter "Monitor").
2. Each asbestos work area shall be isolated in an air-tight manner from the remainder of the facility using polyethylene barriers as outlined in Subsection 19a-332a-5(c) of the RCSA.
3. In accordance with the RCSA, the asbestos abatement contractor (hereafter the "Contractor") shall, using HEPA filter equipped vacuums and wet methods, remove all remaining asbestos containing materials, and clean and decontaminate all floor, wall, and ceiling surfaces in each asbestos work area.
4. At the conclusion of the final cleaning operation, the Project Monitor shall conduct a visual inspection of each work area to ensure that no visible residue remains within the work area. Once it is determined by the Project Monitor that no visible residue is present, post abatement air samples shall be collected and analyzed in accordance with the requirements of Section 19a-332a-12 of the RCSA.

Scenario 2: Areas 4-6 including damaged windows and damaged window glazing; galbestos and other roofing materials; repointing tar from the south wall of the building; and transite panels:

Based upon the information provided in your Application and based upon the Department's understanding that this scenario requests a variance from **Subsections 19a-332a-5(b), (c), (d), (e), (h), Subsections 19a-332a-7(b), (c), and Section 12** of the RCSA, approval for this scenario is granted. This approval is additionally based upon the March 29, 2019 determination by **Mr. Thomas Battles, P.E.** that the mezzanine area of Station B is unsafe to enter to perform the abatement of the mezzanine windows.

In strict accordance with your Application and in lieu of the requirements of **Subsections 19a-332a-5(b), (c), (d), (e), and (h), Subsections 19a-332a-7(b), (c), and Section 12** of the RCSA, the following work practices shall be used to demolish and remove the subject facility:

- 1) With the exception of the damaged windows and damaged window glazing; galbestos and other roofing materials; repointing tar from the south wall of the building; and transite panels, all other asbestos containing materials within or attached to this facility shall first be removed by the Contractor in full accordance with the RCSA and in accordance with Scenario 1 above. Scenario 2 shall not apply until that work has been completed as determined by the Monitor.
- 2) A regulated asbestos work area shall be established at the perimeter of the facility by the Contractor. All work within the regulated work area shall be performed using "wet" methods. Individuals who are Department certified Asbestos Supervisors or Asbestos Workers shall perform this work.

- 3) No work within the regulated work area shall be performed unless the Monitor is physically on site to directly observe the work. This monitoring shall continue on a full-time basis during this project.
- 4) If mechanical equipment is used within the regulated work area to demolish and/or load-out the waste from this facility, the equipment operator shall meet the minimum training requirements established by the US Department of Labor, Occupational Safety and Health Administration. As a minimum, any equipment operator shall have completed a 32-hour Asbestos Worker training course, and shall have up-to-date medical surveillance and respirator fit test documents at the site.
- 5) Daily air samples shall be collected by the Monitor during this asbestos abatement project. These samples shall be analyzed by a Department certified environmental testing laboratory.
- 6) If, at any time during the course of this asbestos abatement project, fiber concentrations at the boundary of the regulated asbestos work area exceed 0.010 fibers per cubic centimeter using Phase Contrast Microscopy analysis, asbestos removal shall stop and the Department shall be notified. The Monitor shall determine the cause of the elevated fiber concentration. Work shall not resume until written permission is received from the Department.
- 7) Demolition of this structure shall proceed at a pace that will allow existing known and potentially asbestos containing debris to be identified and sorted within the regulated work area. The sorting and segregating of waste within the regulated work area shall be performed by the Contractor. If desired by the Contractor, discrete non-asbestos materials such as glass, wood, metal, concrete, brick, and other masonry products may be decontaminated and either salvaged or disposed as construction waste.
- 8) During this asbestos abatement, the Contractor shall, prior to discharge, filter all waste water generated within the regulated area using the best available technology.
- 9) Prior to any discrete materials or equipment crossing the boundary out of the regulated area, the Monitor shall visually inspect the material or equipment to determine whether it is asbestos-free. All discrete materials shall be considered asbestos containing or asbestos contaminated until they are determined asbestos-free by the Monitor. *All non-discrete waste located within the regulated area shall be disposed by the Contractor as friable asbestos-containing waste.*

If the Department determines that any materials or equipment have exited the regulated area without first being inspected by the Monitor, this AWP shall be immediately rescinded, and all work on this project shall stop until a new work plan is approved by the Department.

Following the completion of this demolition and abatement project, the Monitor shall inspect the regulated work area and verify in writing to the Department that there is no visible asbestos debris or visible residue remaining within the regulated work area.

Ms. Alisa Werst
March 29, 2019
Page 4 of 4

Where conflicts may exist between this document and any other documents submitted as part of the Application, this document shall take precedence. Except as noted in this letter, all other work practices specified in the RCSA are mandatory. This approval does not relieve the contractor or the facility owner from satisfying the requirements of any other, federal, state, or municipal regulation, and does not address any other environmental issues which may, or may not, exist at this site.

The Department reserves the right to rescind this approval should we determine that equivalent means of asbestos emission control are not being maintained.

Please contact me directly at 860-509-7365 should you wish to discuss this matter further.

Sincerely,



Stephen P. Dahlem
Supervising Environmental Analyst
Asbestos Program
Environmental Health Section

AWPREP768



March 29, 2019

Steve Dahlem
Asbestos Program
CT Dept. of Public Health
410 Capitol Avenue
P.O. Box 340308
Hartford, CT 06134-0308

**RE: ADDENDUM TO THE APPLICATION FOR APPROVAL OF ALTERNATIVE WORK PRACTICES
ENGLISH STATION, STATION B
510A GRAND AVENUE, NEW HAVEN, CONNECTICUT
(HRP# ACV0002.BA)**

Dear Mr. Dahlem:

HRP Associates, Inc. (HRP) has revised the March 8, 2019 asbestos abatement Alternative Work Practice (AWP) to include additional abatement circumstances revealed during the site visit on March 26, 2019. The structural integrity of the mezzanine level appears to have deteriorated further since the Project Designer visit on February 15, 2019, and the proposed AWP method could no longer be employed. HRP has revised the window removal work practices, as discussed below. A letter from a licensed professional engineer verifying the integrity of the remaining abatement areas is included in **Attachment A**.

Also, due to significantly damaged ACM flooring and other ACM materials in the East Office Area and West Office Areas, these areas have been included in the AWP Request. All areas where an AWP work practice is to be employed are included in the attached **Figures 1-4**.

Enco Environmental Contracting and Demolition LLC (the abatement contractor) is subcontracted by ACV Enviro Corporation (the demolition contractor), who is contracted by the United Illuminating Company for this project. The United Illuminating Company (previous property owner) is facilitating the abatement/demolition of the Station B building. HRP is contracted by ACV Enviro Corporation to provide asbestos abatement project designer/project monitoring services.

TRC Environmental Corporation (TRC) completed a NESHAP-type asbestos-containing materials (ACM) survey for the subject building, as documented in a hazardous materials inspection report dated December 12, 2017. A copy of the Inspection for Hazardous Building Materials report was included in the previous AWP submission.

A licensed project monitor will be on site during all phases of work where the AWP is employed. The specific areas of concern where the AWP would be used are described below.

AWP Request for Interior Significantly Damaged Friable and Non-Friable ACM

- Area 1 – Northwest Corner of the Basement:

An approximate 300 square feet (SF) area located in the northwest corner of the basement has approximately 200 linear feet (LF) of damaged pipe insulation, with associated pipe insulation debris on the ground. In addition, there is also approximately 200 SF of wire wrap debris and 125 SF of tank insulation in this area.

- Area 2 – East Office Area

Approximately 1,600 SF of floor tile, 700 SF of joint compound, two interior windows and 800 SF of plaster skim coat. Additional thermal system insulation may also be concealed behind walls.

- Area 3 – West Office Area

Approximately 150 SF of linoleum located in the ladies locker room, 490 SF of flooring located in the men's locker room (3 layers). Additional thermal system insulation may also be concealed behind walls.

HRP requests that the following work practice be used to abate the ACM in the above specified areas:

In lieu of the requirements of section 19a-332a-5(e) (*Floor and wall surfaces in the work area shall be covered with polyethylene sheeting or equivalent. All seams and joints shall be sealed with tape or equivalent.*), the work area shall be isolated from non-work areas with airtight critical barriers. Critical barrier openings are to be pre-cleaned before barrier installation.

The contractor will establish negative pressure and install critical barriers prior to beginning any work. Once all barriers have been set, negative pressure is established and a contiguous decontamination system is in place, work will commence. Damaged friable ACM on the floor shall first be subjected to a thorough cleaning with HEPA vacuuming and wet cleaning methods. Prior to abating the remaining ACM materials in the area, the floor shall be covered with 6 mil polyethylene sheeting, unless the floor is to be removed as ACM.

After all identified ACM materials have been removed from within each subject area, the entire area shall be subjected to a thorough cleaning with HEPA vacuuming and wet cleaning methods. Non-cleanable objects shall be properly packaged and disposed of as asbestos waste. Cleanable objects shall either be decontaminated, or disposed of as asbestos waste as determined by the on-site project monitor. After the cleaning is completed, a visual inspection and post abatement re-occupancy air test in accordance with 19a-332a-12 will be conducted by the licensed Project Monitor.

AWP Request for Windows Located on the Mezzanine level:

- Area 4 – Windows and damaged window glazing on the mezzanine level:

Due to the deteriorating integrity of the mezzanine level roof, abatement workers cannot prepare a work area on the interior side of the windows. Windows will have to be removed from the exterior of the building. It can be assumed that the window glazing debris extends out from the window wall approximately 3 feet, for an approximate total of 924 SF.

After all interior abatement and demolition work has been completed, and the interior of the building will no longer be occupied by site personnel, the asbestos abatement contractor can begin the removal of the mezzanine level windows.

In lieu of the requirements of section 19a-332a-5(c, d, e, h) (*General requirements for asbestos abatement projects*) and 19a-332a-12 (*Post abatement re-occupancy criteria*), HRP requests that the following work practice be used to abate the ACM:

A regulated area and remote decontamination chamber shall set up with applicable warning signs and one layer of 6 mil polyethylene sheeting, secured to the ground, extending out from the exterior wall of the building at least 15 feet. Perimeter PCM air monitoring shall be conducted on a daily basis while asbestos containing building debris are being disturbed, beginning on the first day of disturbance. Every effort should be made to remove the windows with ACM glazing and caulking in an intact manner and wrapped in two layers of 6-mil poly sheeting. The remaining building surface areas shall be wet scrubbed utilizing nylon scrub pads. All loose debris, including debris on the interior side of the window sill and floor, shall be collected using HEPA-filter vacuums and/or wet cleaning methods. The vacuum debris and wipe materials shall be segregated, packaged, and disposed of as asbestos-contaminated waste. Any materials contaminated by the ACM, shall also be removed as asbestos waste.

AWP Request for Demolition of Exterior Friable ACM

- Area 5 – Damaged friable galbestos roof:

Approximately 400 square feet of damaged friable galbestos roof is located over the conduit bank on the east side of the building.

In lieu of the requirements of section 19a-332a-5(b,c,d,e,h) (*General requirements for asbestos abatement projects*) and 19a-332a-12 (*Post abatement reoccupancy criteria*), HRP requests that the following work practice be used to abate the ACM:

Controlled demolition shall commence on Areas 5, after a regulated area has been set up with applicable warning signs. Extreme care shall be exercised so that no water/debris runoff occurs during the course of this project. The on-site project monitor shall ensure that wet methods are being employed at all times by the contractor. Perimeter air monitoring shall be conducted on a daily basis while asbestos containing building debris are being disturbed. The machine operators shall have a minimum of 32 hours asbestos worker training. The resulting demolition debris shall be placed into

double 6 mil polyethylene lined asbestos waste dumpsters and disposed of as friable asbestos waste. Work shall proceed at a pace that will allow existing known and potential asbestos containing materials to be identified, wetted and properly packaged for disposal. Cleanable materials (concrete, brick, and steel) may be segregated and cleaned if possible to minimize waste, as determined by the on-site project monitor. Non-cleanable materials, and commingled materials with contamination or potential contamination, shall be disposed of as asbestos waste.

AWP Request for Demolition of Exterior Non-Friable ACM

Area 6 – South Façade, roofing and associated transite:

According to the TRC December 12, 2017 Hazardous Materials Inspection Report, several exterior non-friable ACMs were identified, including a repointing tar at brick joints/penetrations which exists at random patches along the south façade, and are not always visible as it is painted/sealed over in many areas. This would make it difficult to abate prior to demolition of the building.

In addition, non-friable asbestos-containing roofing materials and transite siding panels were identified. Material quantities are included in Table 2 of previously provided TRC Inspection Report. The roof integrity did not appear to be good at the time of the AWP site visit, and would not be safe for access by abatement or demolition personnel.

In lieu of the requirements of section 19a-332a-5(b,c,d,e,h) (*General requirements for asbestos abatement projects*) and 19a-332a-12 (*Post abatement reoccupancy criteria*), HRP requests that the following work practice be used to demolish the exterior non-friable ACM:

Controlled demolition shall commence on the building after an exterior regulated area has been set up with applicable warning signs. Extreme care shall be exercised so that no water/debris runoff occurs during the course of this project. Perimeter PCM air monitoring shall be conducted on a daily basis while asbestos containing building debris are being disturbed, beginning on the first day of disturbance. The machine operators shall have a minimum of 32 hours asbestos worker training. The resulting demolition debris shall be placed into double 6 mil polyethylene lined asbestos waste dumpsters and disposed of as asbestos waste. Work shall proceed at a pace that will allow existing known and potential asbestos containing materials to be identified, wetted and properly packaged for disposal. Cleanable materials (concrete, brick, and steel) may be segregated and cleaned if possible to minimize waste, as determined by the on-site project monitor. Non-cleanable materials, and commingled materials with contamination or potential contamination, shall be disposed of as asbestos waste.

Conclusion

Other than the above mentioned provisions, all other provisions of 19a-332a-1 through 12 shall be strictly adhered to during the abatement process.

Mr. Steve Dahlem
March 29, 2019
Page 5 of 5

If you have any questions or require additional information, please feel free to contact me at (860) 674-9570 extension 1167.

Sincerely,



Alisa Werst
Senior Project Scientist/
Connecticut Licensed Asbestos Project Designer



Douglas S. Allen, PG, LEP
Project Manager

cc: Kim Neville, ACV Enviro Corporation
Richard Shultz, Enco Environmental Contracting and Demolition LLC
Shawn Crosbie, UIL Holdings Corporation

Attachments

FIGURES

ATTACHMENT A

Engineers Letter





March 29, 2019

Kim Neville
Project Coordinator
ACV Enviro
118 Burr Court
Bridgeport, CT 06605

RE: BUILDING CONDITION ASSESSMENT, ENGLISH STATION POWER PLANT, 510 GRAND AVE., NEW HAVEN, CONNECTICUT (HRP #ACV0003.EE, OPP7612-2019)

Dear Ms. Neville:

HRP Associates, Inc. (HRP) has been contracted by ACV Enviro to perform a building condition assessment for the above captioned property.

The property consists of 9 acres of land located south of Grand Avenue in the City of New Haven. The Station B building was historically occupied by The United Illuminating Company but is currently vacant and slated for demolition.

On March 28, 2019, HRP conduct a limited visual conditions assessment of the site Station B building to determine which areas of the building can be included in a hazardous building materials abatement and which areas will require an alternative work practice (for building abatement).

Based on the site evaluation conducted in March of 2019, it was determined that the area of the second floor mezzanine is unsafe to perform abatement work due to partial collapse of the roof above. The attached figure delineates the area that is unsafe and will require an alternative work practice to perform the abatement. The remaining areas of the Station B building are safe to enter for abatement work.

If you have any questions or require additional information, please feel free to contact HRP at (860) 674-9570.

Sincerely,

A handwritten signature in black ink that reads 'Thomas Battles'.

Thomas Battles, P.E.
Engineering Practice Leader

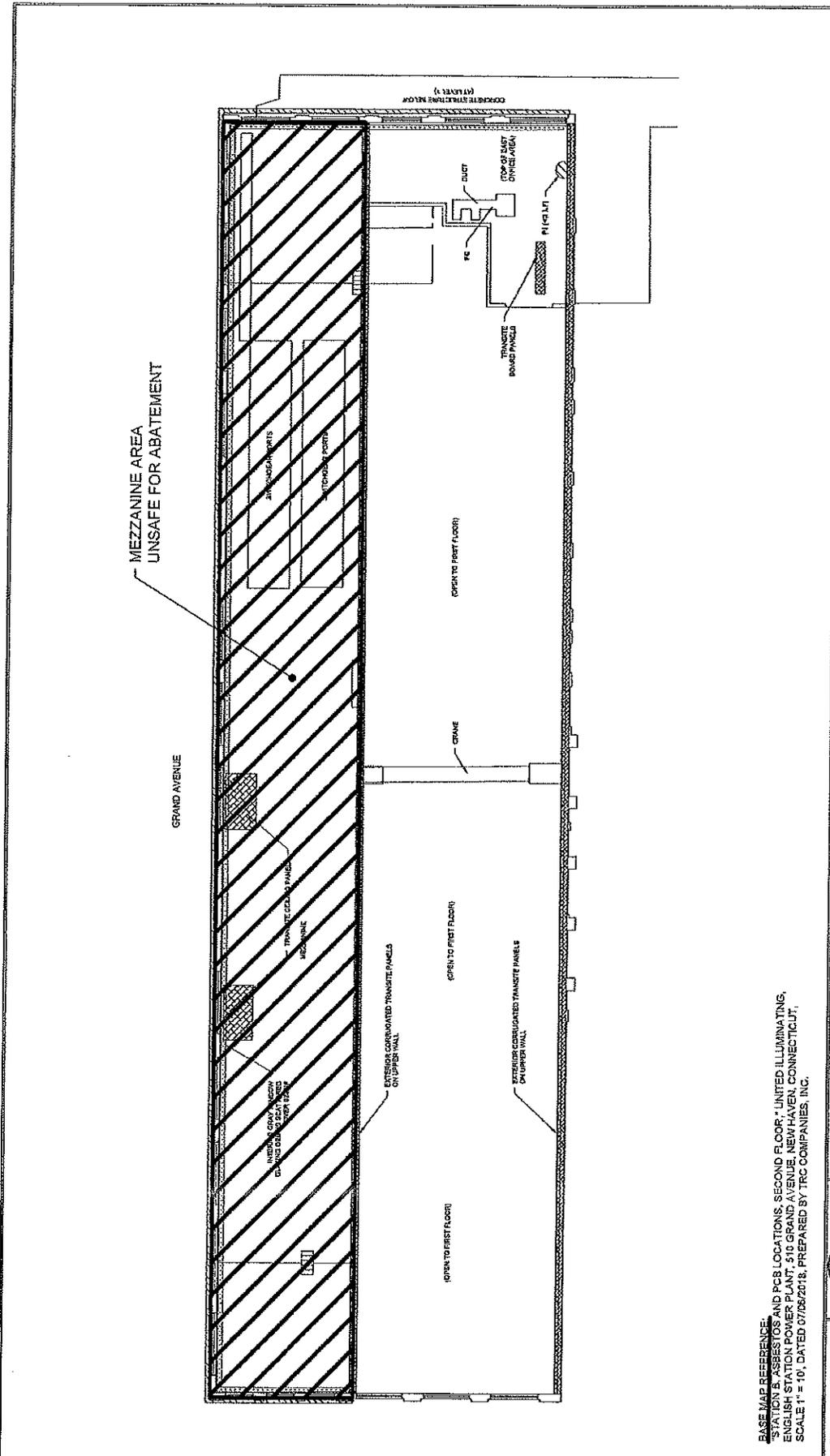
Attachment



Mezzanine Roof Condition



Mezzanine Roof Condition



BASE MAP REFERENCE:
 STATION 6, ASBESTOS AND PCB LOCATIONS, SECOND FLOOR, UNITED ILLUMINATING,
 ENGLISH STATION POWER PLANT, 510 GRAND AVENUE, NEW HAVEN, CONNECTICUT,
 SCALE 1" = 10', DATED 07/06/2018, PREPARED BY TRC COMPANIES, INC.

 HRP 27 SCOTT SWAMP ROAD SUITE 0002 GRIEN 074-8870 HRP@GCIATES.COM	 NORTH 0 10' 20'	REVISIONS NO. DATE		DESIGNED BY:	TRB	REVIEWED BY:	TRB	ISSUE DATE:	03/28/2019	
		DRAWN BY: EJD		PROJECT NUMBER:	ACV0003.EE	SHEET SIZE:	11"x17"			
				UNSAFE WORK AREAS			UNITED ILLUMINATING ENGLISH STATION POWER PLANT 510 GRAND AVENUE NEW HAVEN, CONNECTICUT			
							FIGURE <h1 style="font-size: 2em;">A</h1>			



STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

APPLICATION FOR ALTERNATIVE WORK PRACTICES

STATE USE ONLY	
Date Received	
Check #	
Trans #	
Entered	

Please provide the following information as required by the Regulations of Connecticut State Agencies, Section 19a-332a-11. Be sure to note if there are attachments. An incomplete application will result in a delayed response. Fee for application is \$200, payable to "Treasurer, State of Connecticut". Allow ten days to review application, except for emergency applications. Application may only submitted by a licensed asbestos project designer.

1. PROJECT DESIGNER INFORMATION

Date of Application 3/8/19 Revised 5/20/19 Inspection Date: 12/15/19
 Name of Project Designer Alisa Werst
 License # 343 License Expiration Date 1/31/20 Phone # (203) 668-4665
 Address HRP Associates, 197 Scott Swamp Road
 City, State, Zip Code Farmington, CT 06032
 Signature *Alisa Werst*

2. PROPERTY INFORMATION

Facility Owner Haven River Properties
 Address 115-10 Queens Blvd - Suite LL1, Forest Hills, NY 11375
 Phone (917) 705-7023 Contact Person Mr. David Trooper
 Address of Facility English Station, Station B, 510A Grand Avenue
 City, State and Zip Code New Haven, Connecticut 06513

3. ASBESTOS ABATEMENT CONTRACTOR INFORMATION (IF KNOWN) Revised 5/20/19

Asbestos Abatement Contractor Bestech Inc. of Connecticut CT License # 000016
 Address 25 Pinney Street
 City, State Zip Code Ellington, CT 06029
 Phone (860) 896-1000 Contact Person James Newbury

4. PROJECT SUMMARY

Nature of Abatement Renovation Demolition Both
 Type of Asbestos Abatement Removal Enclosure Encapsulation Spot Repair
 Start Date (if known)

Type and Amount of Asbestos Material Pertaining to AWP (Use additional attachment if necessary)

Floor Tile (FT ²)	Linoleum (FT ²)	Transite (FT ²)	Other Non-Friable (specify)
		Galbestos (see attached)	Exterior Roofing and Repointing Tar - See Attached
Window Caulking (LF)	Pipe Insulation (LF)	Pipe Fittings (each)	Other Friable (specify)
See Attached	See Attached	See Attached	See Attached



Phone: (860) 509-7367, Fax: (860) 509-7378
 Telephone Device for the Deaf (860) 509-7191
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 P.O. Box 340308 Hartford, CT 06134
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CTDEEP – DEEP-WPED-GP-015

**General Permit for Discharge of Stormwater and Dewatering
Wastewaters Associated with Construction Activities**

Application #201900771



Bureau of Materials Management and Compliance Assurance

Notice of Permit Authorization

March, 13 2019

SHAWN C. CROSBIE
THE UNITED ILLUMINATING COMPANY
180 Marsh Hill Rd
Orange, CT 06477-3629

Subject: General Permit Registration for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities
Application NO.: 201900771

SHAWN C. CROSBIE:

The Department of Energy and Environmental Protection, Water Permitting and Enforcement Division of the Bureau of Materials Management and Compliance Assurance, has completed the review of the 510 Grand Avenue (located at 510 Grand Ave, New Haven) registration for the **General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities, effective 10/1/13 (general permit)** . The project is compliant with the requirements of the general permit and the discharge(s) associated with this project is (are) authorized to commence as of the date of this letter. Permit No. GSN003422 has been assigned to authorize the stormwater discharge(s) from this project.

Questions can be emailed to deep.stormwater@ct.gov.

APPROVAL WITH CONDITIONS

April 3, 2020

Mr. Shawn Crosbie
United Illuminating
180 Marsh Hill Road
Orange, CT 06477

Re: Partial Soil Remedial Action Plan
510A & 510 Grand Avenue
New Haven, CT
Partial Consent Order (PCO) COWSPCB 15-001

Dear Mr. Crosbie:

The Storage Tank & PCB Enforcement Unit of the Emergency Response and Spill Prevention Division of the Bureau of Materials Management and Compliance Assurance (“BMMCA”) has reviewed the Partial Soil Remedial Action Plan for Parcel A and Parcel B submitted by United Illuminating (“UI”). This plan addresses remediation of certain soils, for pollutants other than PCBs, on what is referred to as Parcel A and Parcel B in Partial Consent Order COWSPCB 15-001 at the property noted above referred to as English Station.

The plan was prepared for UI by Weston and Sampson and received by the BMMCA in hard copy on September 25, 2019. Subsequently UI submitted a revised plan and supporting technical information on October 21, 2019, November 21, 2019 and January 9, 2020. (The September 25, 2019, October 21, 2019, November 19, 2019 and January 9, 2020 submissions together are hereinafter referred to as the (“Partial Non-PCB Soil Plan”).

The Partial Non-PCB Soil Plan is partial for two reasons. First, since it does not address PCBs, it does not address all pollutants on Parcels A and B. Second, it only addresses certain areas on Parcels A and B. For example, on Parcel B it only addresses soils around, but not under, the power plant.

While the Partial Non-PCB Soil Plan is very detailed, generally speaking, to comply with the direct exposure criteria of the State’s Remediation Standard Regulations (“RSRs”),¹ in accordance with section 22a-133k-2(b)(3), the plan requires rendering inaccessible soils that are

¹ The pollutant mobility criteria requirement in the RSRs regarding soils is being met by a previously issued variance for widespread polluted fill under section 22a-133k-2(f)(1) of the RSRs).

polluted with substances other than PCBs at levels that exceed the Industrial/Commercial Direct Exposure Criteria. Such soils will need to meet the definition of inaccessible soil, as that term is defined in section § 22a-133k-1(a)(32). An environmental land use restriction (“ELUR”) will also be placed on such inaccessible soils in accordance with Conn. Agencies Regs. § 22a-133k-2(b)(3). This ELUR will need to be reviewed, signed, filed on the land records and complied with by the owners of Parcel A and Parcel B, currently Haven River Properties, LLC and Paramount View Millennium, LLC, respectively.

In issuing this conditional approval, I also highlight and emphasize two things. First, The Partial Non-PCB Soil Plan does not address PCB remediation in soil at Parcel A or Parcel B. Separate plans (one for Parcel A, another for Parcel B) have or will be submitted to address soil contaminated with PCBs. Second, the plan does not address pollution in groundwater anywhere at the English Station site, for any pollutant.

I highlight these matters to emphasize that while the BMMCA is approving with conditions the Partial Non-PCB Soil Plan, this approval does not alleviate UI of the responsibility under the Partial Consent Order noted above to continue to investigate and remediate the English Station site, including PCB contamination in soils at English Station, groundwater for the entire English Station site or any newly discovered contaminants in soils or sediments at English Station. In fact, as you are aware, since the submission of the Partial Non-PCB Soil Plan, at least four new areas of contamination have been discovered at Parcel A. Clearly, these areas and any additional areas that are discovered will have to be addressed separately and may require additional investigation and remediation. In addition, implementation of the Partial Non-PCB Soil Plan shall not foreclose or limit the alternatives available for any remaining investigation or remediation. Put differently, this approval does not provide, and shall not serve as, a basis for not considering or implementing any alternative regarding any of the additional investigation or remediation required under the Partial Consent Order noted above.

With this understanding, the Partial Non-PCB Soil Plan for Parcel A and Parcel B in conjunction with the supporting technical information is hereby **approved**, subject, however, to compliance with the following conditions:

- 1) UI shall provide a copy of the Partial Non-PCB Soil Plan to the current owner of Parcel A, Haven River Properties, LLC (“the owner”) and the current owner of Parcel B, Paramount View Millennium, LLC. No later than forty-five (45) days from the date of this approval, UI shall submit for the BMMCA’s review and approval, an acknowledgement demonstrating to the Department’s satisfaction that the owners of Parcel A and Parcel B have each received a copy of the Plan, that each owner has reviewed and has no objection to implementation of the Plan and that each owner will sign, place on the land records and maintain compliance with the ELUR required by the Plan (as it is required to under the duly recorded CO# COWSPCB 16-003 that it took the property subject to and is bound by). Such acknowledgement must be signed by the owner of their respective parcels.

After UI submits the information required by this condition, the BMMCA will notify UI, in writing, of its determination regarding whether the information submitted meets the requirements of this condition. If the BMMCA determines that the information submitted by UI does not meet the requirements of this condition, notwithstanding this approval, UI’s Partial Non-PCB Soil

Plan shall be considered disapproved and shall not be implemented by UI unless and until UI receives further written notice from the BMMCA. If the BMMCA determines that the information submitted by UI meets the requirements of this condition, UI shall implement the Partial Non-PCB Soil Plan.

2) UI shall maintain the site-wide network of groundwater monitoring wells currently at the English Station site and ensure that implementation of the Partial Non-PCB Soil Plan does not impact or effect the functioning of such wells.

This approval does not relieve UI of the obligation to obtain any other authorizations as may be required by Federal, State or Local laws or regulations. Nothing herein precludes DEEP from taking any action or instituting any proceeding should actions to date prove inadequate or for any other appropriate purpose.

If you have any questions regarding the above, please contact Gary Trombly by e-mail gary.trombly@ct.gov or phone at (860) 424-3486.

Sincerely,



Peter Zack, Director
Emergency Response & Spill
Prevention Division

cc: Kimberly Tisa, US EPA R1 PCB Coordinator
Haven River Properties, LLC (c/o David Tropper, managing member)
Paramount View Millennium, LLC (c/o David Tropper, managing member)
Arnold Cohen, Esq.
David Labelle, Avangrid

Sent Certified Mail #
Return Receipt Requested

APPROVAL WITH CONDITIONS

March 5, 2020

Mr. Shawn Crosbie
United Illuminating
180 Marsh Hill Road
Orange, CT 06477

Re: Parcel A PCB Remedial Action Plan
English Station
510A Grand Avenue
New Haven, CT
Partial Consent Order (PCO) COWSPCB 15-001

Dear Mr. Crosbie:

The Storage Tank & PCB Enforcement Unit of the Emergency Response and Spill Prevention Division of the Bureau of Materials Management and Compliance Assurance (“BMMCA”) has reviewed the PCB Remedial Action Plan for Parcel A submitted by United Illuminating (“UI”). This plan addresses remediation of PCBs in soil on what is referred to as Parcel A in Partial Consent Order COWSPCB 15-001 (“Parcel A”) at the property noted above referred to as English Station.

The plan was prepared for UI by Weston and Sampson and received by the BMMCA in hard copy on September 25, 2019. Subsequently UI submitted a revised plan and supporting technical information on October 21, 2019 and on November 19, 2019. (The September 25, 2019, October 21, 2019 and November 19, 2019 submissions together are hereinafter referred to as the “PCB Soil Plan”).

While the PCB Soil Plan is very detailed, generally speaking, to comply with direct exposure criteria of the state’s Remediation Standard Regulations (“RSRs”), the plan calls for the removal of soils containing greater than 1 parts per million (“ppm”) of PCBs from most of Parcel A. On the remaining portion of Parcel A, soils equal to or greater than 10 ppm PCBs will be removed and the remaining soils, i.e., those with PCBs above 1ppm and equal to or greater than 10 ppm, will be rendered inaccessible and meet the definition of inaccessible soil, as that term is defined in Conn. Agencies Regs. § 22a-133k-1(a)(30). Under the RSRs, the remedy selected by UI also includes an environmental land use restriction (“ELUR”) and, what the US Environmental Protection Agency refers to as, a deed restriction. An ELUR will need to be placed on inaccessible soils in accordance with Conn. Agencies Regs. § 22a-133k-2(b)(3). In addition,

under Conn. Agencies Regs. § 22a-133k-1(b), placement of the deed restriction specified in 40 CFR § 761.61(a)(8)(i)(A) on Parcel A is also required. The ELUR and deed restriction will need to be reviewed, signed, filed on the land records, and complied with by the owner of Parcel A, currently Haven River Properties, LLC. (The ELUR and deed restriction could potentially be released if a supplemental plan is approved by BMMCA that renders unnecessary the need for such ELUR and deed restriction).

In issuing this conditional approval, I also highlight and emphasize two things. First, the PCB Soil Plan does not address any pollutants in soil at Parcel A other than PCBs. A separate plan has been submitted to address these other pollutants. Second, the PCB Soil Plan does not address pollution in groundwater anywhere at the English Station site, whether from PCBs or from any other pollutant.

I highlight these matters to emphasize that while the BMMCA is approving with conditions the PCB Soil Plan, this approval does not alleviate UI of the responsibility under the Partial Consent Order noted above to continue to investigate and remediate the English Station site, including the soils at Parcel A with regard to pollutants other than PCBs, soils at the remainder of English Station site, groundwater for the entire English Station site or any newly discovered PCBs in soil at Parcel A. In fact, as you are aware, since the submission of the PCB Soil Plan, at least four new areas of contamination, some with PCBs in soil, have been discovered at Parcel A. Clearly, these areas and any additional areas that are discovered will have to be addressed separately from the PCB Soil Plan, and may require additional investigation and remediation. The PCB Soil Plan does not address such areas. In addition, implementation of the PCB Soil Plan shall not foreclose or limit the alternatives available for any of this remaining investigation or remediation. Put differently, this approval does not provide, and shall not serve as, a basis for not considering or implementing any alternative regarding any of the additional investigation or remediation remaining under the Partial Consent Order noted above.

Also, as you know, remediation of the English Station site is subject to 40 CFR 761 within the purview of the United States Environmental Protection Agency (“EPA”). As such, apart from this conditional approval, UI must also obtain approval from EPA before proceeding with any remediation at Parcel A.

With this understanding, the PCB Soil Plan for Parcel A and supporting technical information is hereby **approved**, subject, however to compliance with the following conditions:

- 1) UI shall provide a copy of the PCB Soil Plan to the current owner of Parcel A, Haven River Properties, LLC (“the owner”). No later than forty-five (45) days from the date of this approval UI shall submit for the BMMCA’s review and approval, an acknowledgement demonstrating to the Department’s satisfaction that the owner has received a copy of the PCB Soil Plan, that it has reviewed and has no objection to implementation of the Plan and that it will sign, place on the land records and maintain compliance with the ELUR and deed restriction required by the Plan (as it required to under the duly recorded CO# COWSPCB 16-003 that it took the property subject to and is bound by). Such acknowledgement must be signed by the owner.

After UI submits the information required by this condition, the BMMCA will notify UI, in writing, of its determination regarding whether the information submitted meets the requirements of this condition. If the BMMCA determines that the information submitted by UI does not meet the requirements of this condition, notwithstanding this approval, UI's PCB Soil Plan shall be considered disapproved and shall not be implemented by UI unless and until UI receives further written notice from BMMCA. If the BMMCA determines that the information submitted by UI meets the requirements of this condition, UI shall implement the PCB Soil Plan.

- 2) UI shall obtain the written approval of its PCB Soil Plan from EPA prior to implementing this plan.
- 3) UI shall maintain the site-wide network of groundwater monitoring wells currently at the English Station site and ensure that implementation of the PCB Plan does not impact or effect the functioning of such wells.

This approval does not relieve UI of the obligation to obtain any other authorizations as may be required by federal, state or local laws or regulations. Nothing herein precludes DEEP from taking any action or instituting any proceeding should actions to date prove inadequate or for any other appropriate purpose.

If you have any questions regarding the above, please contact Gary Trombly by e-mail gary.trombly@ct.gov or phone at (860) 424-3486.

Sincerely,



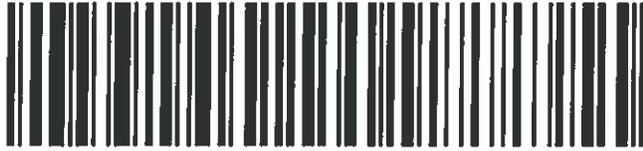
Peter Zack, Director
Emergency Response & Spill
Prevention Division

cc: Kimberly Tisa, US EPA R1 PCB Coordinator
Haven River Properties, LLC (c/o David Tropper, managing member)
Aaron Cohen, Esq.
David LaBelle, Avangrid

Sent Certified Mail #
Return Receipt Requested

USPS CERTIFIED MAIL™

DEEP
Carlos Guzman
79 ELM ST
HARTFORD CT 06106



*Received 11 Mar 20
@ 400*

9414 8149 0158 5922 1011 41

Mr. David LaBelle
Mr. David LaBelle
180 Marsh Hill Road

Orange CT 06477

USEPA – Notification of Demolition and Renovation



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

DEC 17 2019

United Illuminating Company
Attn: Shawn Crosbie, Project Manager
180 Marsh Hill Road
Orange, Connecticut 06477

Haven River Properties, LLC
Attn: David Tropper, Managing Partner
84-25 Abingdon Road
Kew Gardens, New York 11415

Re: PCB Cleanup and Risk-Based Disposal Approval under 40 CFR §§ 761.61(a) and (c)
English Station Parcel A / New Haven, CT

Dear Mssrs. Crosbie and Tropper:

This is in response to the Notification by the United Illuminating Company (“UI”)¹ to address PCB-contaminated soil, sediment, concrete, and other debris located on Parcel A (“the Site”) of the English Station properly located at 510A Grand Avenue in New Haven, Connecticut as authorized by the federal PCB regulations at 40 CFR Part 761. PCBs are present on the Site at concentrations that exceed the allowable PCB level for *unrestricted use* under the federal PCB regulations at 40 CFR § 761.61(a). UI has requested approval to address the PCB contamination within the Site area under the PCB cleanup and disposal options at 40 CFR §§ 761.61(a) and (c).

Based on the information provided, the Site is owned by Haven River Properties, LLC (“HRP”) but UI will be conducting the remedial actions proposed in the submitted Notification, which include the following activities:

1. Collect pre-excavation (i.e., verification samples) in the location where sheet piling may be required to support the soil excavation, to confirm PCB concentrations are less than or equal to (“≤”) 1 part per million (“ppm”);

¹ Information was submitted by UI to satisfy the notification requirement under 40 CFR §§ 761.61(a)(3) and (c). Information was provided dated November 2018 (*Parcel A Remedial Action Plan*); March 25, 2019 (UI Comment Response Letter); September 19, 2019 (revised September 2019 *Parcel A Remedial Action Plan*); November 15, 2019 (response to CTDEEP and EPA comments transmitted during November 7, 2019 conference call); December 2019 (revised December 2019 *English Station Parcel A PCB Remedial Action Plan, as revised December 2019*); and, December 10, 2019 (emails pertaining to contractor work plans submittals and clean cover). These submittals will be referred to as the “Notification.”

2. Collect samples for PCB analysis from debris piles located on Parcel A to determine if PCBs concentrations are ≥ 1 ppm or $\geq 10 \mu\text{g}/100 \text{ cm}^2$ and if so, remove the pile(s) and dispose off-site as a ≥ 50 ppm *PCB remediation waste* in accordance with 40 CFR § 761.61(a)(5)(i)(B)(2)(iii). Attachment 2;
3. Following removal of the debris piles, if PCBs were identified at ≥ 1 ppm or $\geq 10 \mu\text{g}/100 \text{ cm}^2$ in a debris pile, the underlying material will be sampled for PCBs and removed as necessary to achieve a PCB cleanup standard of ≤ 1 ppm north of the Parcel A demarcation line and ≤ 10 ppm south of the Parcel A demarcation line;
4. Remove water from subsurface structures, including the manholes and catch basins, treat water for discharge in accordance with 40 CFR 761.79(b)(1)(iii), and dispose of captured sediments with the treatment system components as a ≥ 50 ppm PCB waste in accordance with 40 CFR § 761.61(a)(5)(i)(B)(2)(iii);
5. Sample the subsurface concrete structures and concrete piping for PCBs; and, if PCB concentrations are found at > 1 ppm, the contaminated structure and/or piping will be removed and disposed off-site as a *PCB remediation waste* in accordance with 40 CFR § 761.61(a)(5)(i)(B)(2)(iii), with exception of subsurface concrete which cannot be removed due to structural concerns where the requirements under 40 CFR § 761.30(p) for *Continued use of porous surfaces contaminated with PCBs regulated for disposal by spills of liquid PCBs* will be implemented;
6. Dewater the cooling water tunnel, treat water for discharge in accordance with 40 CFR § 761.79(b)(1)(iii) and dispose of captured sediments with the treatment system components as a ≥ 50 ppm PCB waste in accordance with 40 CFR § 761.61(a)(5)(i)(B)(2)(iii);
7. If present, remove remaining sediments from tunnel and place in lined storage container; test accumulated free water in storage container to determine if the PCB concentration is $< 0.5 \mu\text{g}/\text{L}$ and/or the sediment passes the paint filter test for disposal in a landfill; and, dispose of dewatered sediment as a < 50 ppm PCB waste in accordance with 40 CFR § 761.61(a)(5)(i)(B)(2)(ii);
8. Excavate PCB-contaminated soil with greater than > 1 ppm but < 50 ppm located within the ≤ 1 ppm PCB demarcation area (i.e., north of the Parcel A demarcation line), and dispose off-site as a *PCB remediation waste* in accordance with 40 CFR § 761.61(a)(5)(i)(B)(2)(ii). Attachment 3;
9. Collect post-excavation soil samples (with exception of the sheet pile area(s) sidewalls) in accordance with 40 CFR Part 761 Subpart O to confirm that the PCB concentrations remaining are ≤ 1 ppm;

10. Construct a clean cover comprised of an orange geotextile, and a minimum 4-feet of clean soil or a 2-feet clean soil cover overlain with a minimum 3 inches of bituminous concrete, over > 1 ppm but ≤ 10 ppm *PCB remediation waste* and over subsurface concrete where the requirements under 40 CFR § 761.30(p) for *Continued use of porous surfaces contaminated with PCBs regulated for disposal by spills of liquid PCBs* are implemented. Attachment 4, and;
11. Record a deed notice in accordance with 40 CFR § 761.61(a)(8) to document PCB concentrations remaining at the Site and any use restrictions and cap maintenance requirements.

UI has proposed alternatives to the prescriptive requirements under 40 CFR § 761.61(a). Specifically, UI is proposing the following: a modification to the cap design requirements under 40 CFR § 761.61(a)(7); and, pre-verification sampling in locations where sheet piling will be installed to limit groundwater infiltration and to facilitate excavation.

EPA has determined that: (1) the proposed cover is consistent with the Connecticut Department of Energy and Environmental Protection (“CTDEEP”) regulations for ≤ 10 ppm PCB-contaminated soil (i.e., *PCB remediation waste*) for an Industrial/Commercial setting; and, (2) the proposed pre-verification sampling at the location where sheet piling will be required for excavation is reasonable. EPA finds that the proposed alternative sampling and alternative clean cover, once completed, will not present an unreasonable risk of injury to health or the environment. EPA applies this no unreasonable risk standard in accordance with the PCB regulations at 40 CFR § 761.61(c), and the Toxic Substances Control Act, at 15 C § 2605(e).

UI may proceed with its plan in accordance with 40 CFR §§ 761.61(a) and (c), and its Notification, subject to this Approval and the conditions of Attachment 1. Please be aware that this Approval requires certification by both UI and the Site owner, HRP, of acceptance of the Approval conditions stated herein. Failure of either party to submit such certification shall be grounds for EPA’s withdrawal of this Approval.

This Approval does not release UI or HRP from any applicable requirements of federal, state or local law, including those requirements related to groundwater monitoring or to remediation of contaminants, including PCBs, at the property by the CTDEEP.

Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator (LCRD07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Tisa.kimberly@epa.gov

EPA encourages the compliance with greener cleanup practices for all cleanup projects, and recommends adherence to the ASTM Standard Guide to Greener Cleanups E2893-16 (Guide) for work conducted under this Approval and the Notification. Greener Cleanups is the practice of integrating options that minimize the environmental impacts of cleanup actions in order to incorporate practices that maximize environmental and human benefit. Please see Section 6 of the Guide for the Best Management Practices (BMP) Process dated May 2016 (See www.astm.org/Standards/E2893.htm for additional information). EPA encourages you to review the Guide and implement any practices that are feasible. If implemented, the PCB completion report (see Attachment 1, Condition 21) should include a section on BMP Documentation, as described in Section 6.6.5 of the Guide.

EPA shall not consider this specific project complete until it has received all submittals required under this Approval, including construction of the clean cover and recording of the deed notice. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,



Nancy Barmakian, Acting Division Director
Land, Chemicals and Redevelopment Division

Attachment 1: Approval Conditions

Attachment 2: Figure 6 - Parcel A Existing Conditions Plan and Site Work

Attachment 3: Figure 8 - Parcel A PCB Soil Remediation Areas

Attachment 4: Figure 9 – Parcel A Final Site Conditions and Grading

cc: Gary Trombly, CTDEEP
File

ATTACHMENT 1

**PCB CLEANUP AND RISK-BASED DISPOSAL APPROVAL CONDITIONS
ENGLISH STATION PARCEL A (“the Site”)
510A GRAND AVENUE
NEW HAVEN, CONNECTICUT**

GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the PCB-contaminated soil, concrete, and debris located on the English Station Parcel A property as identified in the Notification.
 - a. In the event that the United Illuminating Company (“UI”) or Haven River Properties, LLC (“HRP” and together, “the Parties”) identifies new Site conditions, or PCB-contaminated soil or other media not described in the Notification, which is subject to cleanup and disposal under the PCB regulations, UI or HRP shall be required to notify EPA and to clean up such PCB-contaminated soil and other media in accordance with 40 CFR Part 761.
 - b. UI or HRP may submit a separate plan to address such PCB contamination not identified in the Notification or may modify the Notification to incorporate cleanup of such PCBs under this Approval in accordance with Condition 16.
2. The Parties shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.
3. In the event that the cleanup and disposal plan described in the Notification differs from the conditions specified in this Approval, the conditions of this Approval shall govern.
4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.

2

Information was submitted by UI to satisfy the notification requirement under 40 CFR §§ 761.61(a)(3) and (c). Information was provided dated November 2018 (*Parcel A Remedial Action Plan*); March 25, 2019 (UI Comment Response Letter); September 19, 2019 (revised September 2019 *Parcel A Remedial Action Plan*); November 15, 2019 (response to CTDEEP and EPA comments transmitted during November 7, 2019 conference call); and December 2019 (revised December 2019 *English Station Parcel A PCB Remedial Action Plan*); and, December 10, 2019 (emails pertaining to contractor work plans submittals and clean cover). These submittals will be referred to as the “Notification.”

5. UI must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during remedial actions, UI shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.
6. UI is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time UI has or receives information indicating that UI or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.
7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by UI are authorized to conduct the activities set forth in the Notification. UI is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.
8. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release UI or HRP from compliance with any applicable requirements of TSCA or of any other federal, state or local law; or 3) release UI or HRP from liability for, or otherwise resolve, any violations of TSCA or of any other federal, state or local law.
9. Failure to comply with the Approval conditions specified herein shall constitute a violation of the requirement in § 761.50(a) to store or dispose of PCB waste in accordance with 40 CFR Part 761 Subpart D.

NOTIFICATION AND CERTIFICATION CONDITIONS

10. This Approval may be revoked if the EPA does not receive written notification from UI and HRP of their acceptance of the conditions of this Approval within 10 business days of receipt.
11. UI shall notify EPA at least 5 business days before conducting removal of *PCB remediation waste* under this Approval, and shall provide its schedule to implement and complete the activities described in the Notification and authorized by this Approval.
12. Prior to beginning soil excavation work authorized under this Approval, UI shall submit the following information:
 - a. pre-verification sampling results for the soil located within the sheet piling area with any proposed modifications that are necessary to the remediation plan based on these results;

- b. a contractor work plan detailing the specific methods for air monitoring, and removal, decontamination, storage, and disposal of PCB-containing wastes. UI and its remediation contractor shall incorporate any changes EPA deems necessary to comply with the conditions of this Approval and the PCB Regulations at 40 CFR Part 761;
- c. a certification signed by the selected oversight contractor and remediation contractor, if applicable, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval; and,
- d. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the extraction and analytical method requirements and the quality assurance requirements specified in the Notification and in this Approval.

CLEANUP AND DISPOSAL CONDITIONS

13. The cleanup level for *PCB remediation waste* at the Site shall be less than or equal to (“≤”) 1 mg/Kg (or parts per million (“ppm”), except as provided in subparagraphs (a) and (c), below.
- a. The PCB cleanup standard shall be less than or equal to (“≤”) 10 ppm to the south of the demarcation line as shown on Attachment 2. *PCB remediation waste* with greater than (>) 1 ppm but ≤ 10 ppm shall be covered with an orange geotextile fabric overlain with: (1) a minimum 4-foot clean soil cover or; (2) a minimum 2-foot clean soil cover overlain with a minimum 3 inches of bituminous concrete, in compliance with the Connecticut Department of Energy and Environmental Protection Remediation (“CTDEEP”) Regulations.
 - b. All post-cleanup verification sampling for bulk *PCB remediation waste* (i.e., soil) shall be performed on a bulk basis (i.e. mg/Kg) and PCB analytical results reported on a dry-weight basis. Verification sampling for bulk *PCB remediation waste* shall comply with the procedures and frequencies described in the Notification, except as otherwise required herein. Confirmatory samples shall be collected from both excavation bottoms and sidewalls, as applicable.
 - i) In the event PCB concentrations greater than or equal to (\geq) 50 ppm are identified within the Site boundaries during remediation work, UI shall notify EPA with 24 hours of discovery and within 3 business days, shall submit, in writing, its plan to clean up and dispose of the PCB-contaminated waste to comply with 40 CFR Part 761 and this Approval.

- c. *Porous surfaces* (e.g., concrete) shall be sampled on a bulk basis (i.e., mg/Kg) and PCB analytical results reported on a dry-weight analysis. Sampling for *porous surfaces* shall be conducted in accordance with the EPA Region 1 *Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) Revision 4, May 5, 2011*, at a maximum depth interval of 0.5 inches.
 - i) In the event that subsurface concrete structures are present which cannot be removed due to structural stability concerns and where PCB concentrations are > 1 ppm, the requirements under 40 CFR § 761.30(p) for *Continued use of porous surfaces contaminated with PCBs regulated for disposal by spills of liquid PCBs* will be implemented, which shall include, at a minimum, the following : (1) covering the PCB-contaminated *porous surface* with a resistant coating or barrier, and (2) marking of the PCB-contaminated *porous surface* with the PCB M_L mark.
 - d. Chemical extraction for PCBs shall be conducted using Method 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q.
14. All PCB waste (at any concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with 40 CFR § 761.40; stored in a manner prescribed in 40 CFR § 761.65; and, disposed of in accordance with 40 CFR § 761.61(a)(5), unless otherwise specified below:
- a. Non-liquid cleaning materials, such as PPE and similar materials resulting from decontamination, shall be disposed of in accordance with 40 CFR § 761.79(g)(6).
 - b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).
 - c. PCB-contaminated water generated during decontamination or dewatering shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under § 761.70.

INSPECTION, MODIFICATION AND REVOCATION CONDITIONS

15. UI and HRP shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by UI or HRP to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.
16. Any proposed modification(s) in the plan, specifications, or information in the Notification must be submitted to EPA no less than 14 calendar days prior to the proposed implementation of the change. Such proposed modifications will be subject to the procedures of 40 CFR § 761.61(a)(3)(ii).
17. Any departure from the conditions of this Approval without prior, written authorization from the EPA may result in the revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
18. Any misrepresentation or omission of any material fact in the Notification or in any records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.
19. Approval for these activities may be revoked, modified or otherwise altered: if EPA finds a violation of the conditions of this Approval or of 40 CFR Part 761, including EPA's PCB Spill Cleanup Policy, or other applicable rules and regulations; if EPA finds that PCBs are migrating from the Site; or, if EPA finds that these activities present an unreasonable risk of injury to health or the environment.

RECORDKEEPING AND REPORTING CONDITIONS

20. UI shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K and shall submit same to HRP. A written record of these activities shall be established and maintained by both UI and HRP in a centralized location until such time as EPA approves in writing a request for an alternative disposition of such records. All records shall be made available for inspection by authorized representatives of EPA.
21. UI shall submit a final completion report in both a hard copy and electronic version (e.g., CD-ROM), to the EPA and HRP within 60 days of completion of the activities authorized under this Approval. Laboratory analytical reports may be provided in electronic format only. At a minimum, this final report shall include: a short narrative of the project activities with photographic documentation and Greener Cleanups BMP documentation,

if implemented; characterization and confirmation sample analytical results; copies of the analytical chains of custody; field and laboratory quality control/quality assurance checks; the quantity of PCB waste disposed of off-site; copies of manifests and bills of lading; and, copies of certificates of disposal or similar certifications issued by the disposer. UI shall also provide to EPA the estimated cost of the PCB remediation work completed under this Approval.

22. Within sixty (60) days of completion of PCB remediation activities, HRP shall submit to EPA a certification as required at 40 CFR § 761.61(a)(8)(i)(B), that it has recorded the notation on the deed as required under § 761.61(a)(8)(i)(A) with a copy of the recorded deed notice. The deed notice shall also include a requirement for maintenance of the cover to be constructed over > 1 ppm but ≤ 10 ppm *PCB remediation waste* remaining at the Site and for ensuring the requirements under 40 CFR § 761.30(p) are met for the concrete structures, if applicable.
23. Required submittals shall be mailed to:
- Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100 (LCRD07-2)
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
24. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure or penalty policies.

END OF ATTACHMENT 1