UNITED STATES ENVIRONMENTAL PROTECTION AGENCY NEW ENGLAND

Final Draft *May 1, 2001*

Scovill Industrial Landfill Superfund Site

Installing and Maintaining Utility Services

The U.S. Environmental Protection Agency (EPA) added the former Scovill Industrial Landfill located north of Meriden Road in Waterbury, CT to its National Priorities List (NPL) on August 28, 2000. The NPL, also known as Superfund, is a list of hazardous waste sites that are eligible for Federal funding to pay for extensive, long-term cleanup actions. The goal of the Superfund program is to protect people and the environment from the effects of hazardous substances. See the map for site location and boundaries.

The nature and extent of contamination at the Scovill Industrial Landfill Superfund site has yet to be completely defined, therefore precautions must be taken to protect the health of the neighbors, workers, and the surrounding environment. Recognizing that it may be necessary to disturb the soil in order to perform utility installations or repairs, general precautions and guidance for notification, worker protection and managing air emissions, soil, and wastewater are provided below for utility companies.

General Precautions

Soils on the site are potentially contaminated and excavation or invasive work may result in exposing the public to hazardous substances. In addition to following Occupational Safety and Health Administration (OSHA) worker safety and health requirements, as well as CT Department of Environmental Protection (CT DEP) requirements for handling waste materials, companies conducting work on the site must do so in a manner that prevents any exposure to people living and working in the area. The following precaution examples are easy to implement and will minimize exposure to the general public during utility excavation activities.

Excavated soils should be:

1. Dampened to reduce dust generation;
2. Covered or stored in enclosed containers to protect against direct contact;
3. Separated from ground surface by an impermeable barrier to prevent surface contamination.

They should <u>not</u> be:

1. Left on the surface over night or when the area is unattended, and;
2. Placed directly on the ground surface.

Agency Notification

Is notification required for an activity that involves excavating soils?

Yes, EPA needs to be notified at least one week in advance of any planned activity on the site that involves soil excavation -- no matter what the depth. Contact Almerinda Silva toll free at 1-888-372-7341.

Notifications for emergency actions, such as unplanned pipe replacement because of ruptures, must be completed as soon as possible, but no later than one hour after the repair work has begun.

In the event of emergency work on the weekend or holiday, who should be contacted?

Contact EPA at 1-800-424-8802

Where is there more information on state reporting requirements?

Refer to CT DEP's website at www.dep.state.ct.us/wtr/134fso.htm or the contact information at the back of this publication.

Public Notification

The utility or contractor is required to notify residents and building owners next to the work area.

Notification must consist of either posting a large sign (around 36" x 36" or larger) at a safe distance from the excavation site or handing out flyers to the occupants.

The notices, at a minimum, must state:

- What company is performing the work;
- What repair work is being performed;
- The material being excavated may contain contamination so precautions are being followed to limit public and worker exposure;
- A company contact name and a number for EPA.

The sign must be clearly visible and written in English.

MANAGING AIR EMISSIONS

What are considered air emissions and how would they be detected?

Volatile organic compounds (VOCs), methane or other combustible gases and particulate emissions, such as dust, are air emissions. A photo ionization detector (PID), or similar device, may be used in identifying VOCs. A combustible gas indicator (CGI), or the like, may be used in detecting combustible gases. Particulate emissions, which appear as dust or clouds, can be found using a variety of portable instruments or by collecting particles with a canister (to be analyzed later). Utility companies' air monitoring requirements should be outlined in their health and safety plans. Health and safety plans should also include air emission action levels and mitigation measures to address situations that meet or exceed the action levels. For coordination purposes, utilities are requested to share their health and safety plans with EPA.

What if air emissions are detected?

If volatile organic compounds or particulate emissions are detected, stop excavating and review the company's health and safety plan. The plan should include contingency plans for VOC detections and other scenarios.

How can dust be reduced?

To prevent particulate or dust emissions, a dust suppressant, like water, should be applied to the soil. Do not cause run-off by over-spraying the soil. If there is reason to believe air emissions are not being prevented by using a dust suppressant, stop work and refer to the company health and safety plan for alternatives. In addition, contact Almerinda Silva, EPA, at 1-888-372-7341.

MANAGING SOIL

Assume that any soil encountered in this area contains hazardous waste unless testing proves otherwise.

While excavation is occurring, how should the soil be stored?

Utilities conducting excavation at the site should take steps to ensure that excavated materials do not come into contact with surface soils, thereby preventing contamination of the ground surface. These steps should include temporarily placing excavated materials in enclosed containers or placing materials on a liner and covering them with plastic to prevent contaminant movement.

What should be done with excavated soil?

Waste materials may be put back into the excavation provided it is covered with one foot of clean fill. Any excavated material not placed back in the hole must be tested and disposed in accordance with solid and hazardous waste regulations as appropriate. Soils that need to be disposed are the responsibility of the public or private entity performing the excavation. The CT DEP may sample excavated materials to document contaminants found in the subsurface.

Is EPA or DEP approval needed to put the soil back in the excavated area?

Utilities may reuse the contaminated soil in the same excavation within the same work area without prior approval by EPA or CT DEP provided:

1) Any condition that qualifies as a "significant environmental hazard," as defined in Connecticut General Statues 22a-6(u), is reported by the utility and the location identified on a map submitted to EPA and CT DEP;

2) Any excess contaminated material is disposed of in accordance with CT DEP solid

and hazardous waste regulations as appropriate, and;
3) The top of the excavation is paved.

Who's responsible for sampling during excavation?

The public or private entity performing the excavation is responsible for any sampling required to determine whether a significant environmental hazard exists or how excess soils will be disposed.

Where is there more information on state and federal hazardous waste regulations?

CT DEP's website is: http://dep.state.ct.us

EPA's regulations are listed at: www.epa.gov/docs/epacfr40/chapt-I.info/subch-I/

MANAGING WASTEWATER

Should wastewater that is generated be collected and stored?

Wastewater may be discharged to the sanitary sewer if the utilities doing the work have registered for a general permit. Registration can be made in anticipation of future work and one permit can cover all repair work done at the site. Wastewater must be tested and the public water treatment plant must agree to accept it. If the wastewater is too contaminated for the public water treatment plant to treat, it must be disposed of in accordance with solid and hazardous waste regulations as appropriate. Contact CT DEP (see the contact list) for additional information on the general permit and the required forms.

WORKER PROTECTION

Are there any governing worker protection regulations?

The Occupational Safety and Health Administration's (OSHA) Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) applies to utilities and contractors performing repair work at the Scovill Industrial Landfill. These regulations are found at 29 Code of Federal Regulations 1910.120(a)(1)(i-v) and 1926.65(a)(1)(i-v).

Is assistance available for developing a Health and Safety Plan?

Yes, contact: Usha Maru, Occupational Hygienist, or Richard Palo, Occupational Health Supervisor, of the CT Dept. of Labor at (860) 566-4550 extension 394.

Where can I find OSHA information on line?

At OSHA's web address, www.osha.gov or at CT Department of Labor OSHA division's web address, www.ctdol.state.ct.us

Summary of OSHA Regulations

- Health & Safety Plan - Employers shall develop and implement a written health and safety program for their employees involved in hazardous waste operations. The program shall be designed to identify, evaluate, and control health and safety hazards, and provide for emergency response for hazardous waste operations. [29 CFR 1910.120 (b)(1)(i)]

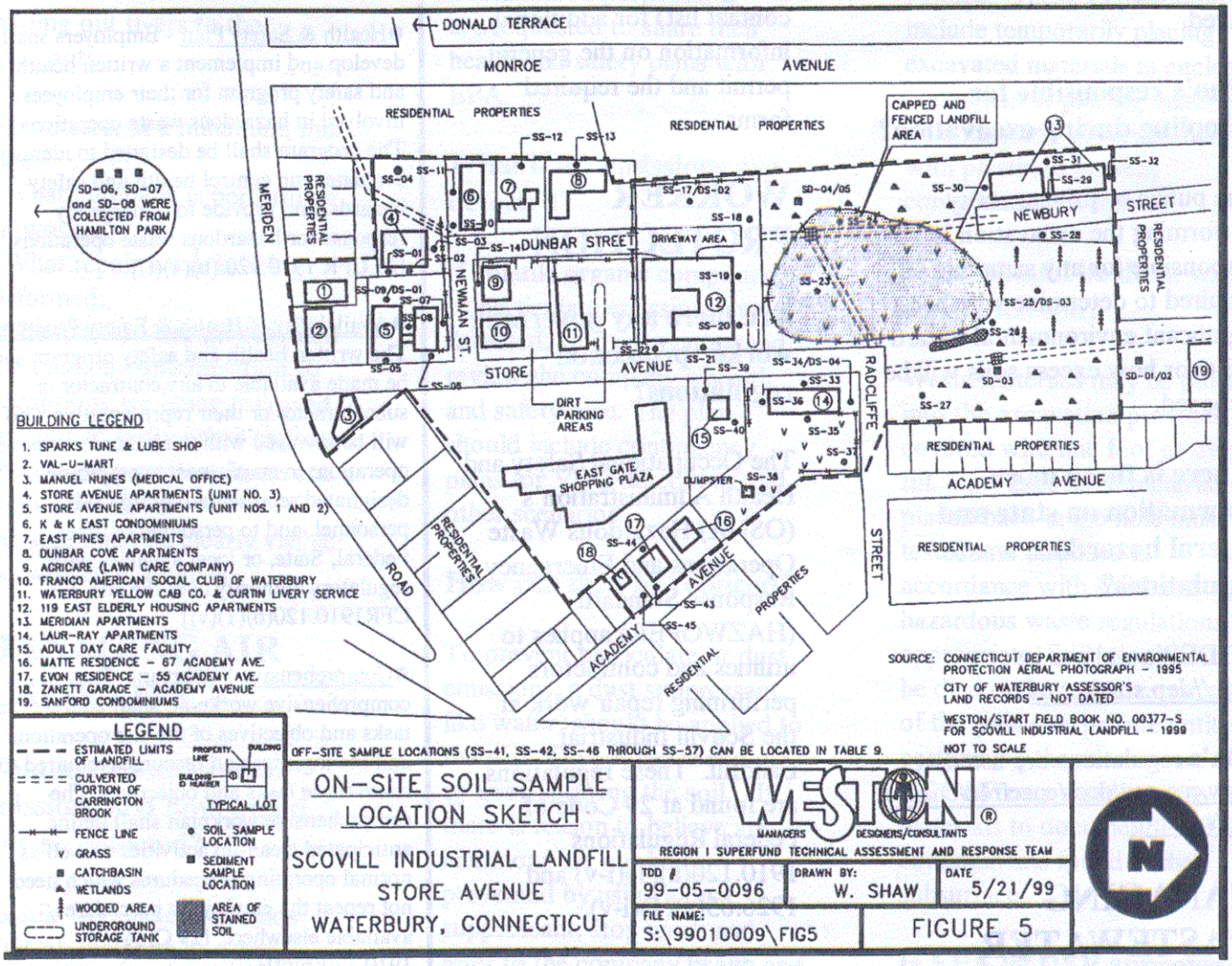
- Availability of Health & Safety Program - The written health and safety program shall be made available to any contractor or subcontractor or their representative who will be involved with the hazardous waste operation; to employees; to employee designated representatives; to OSHA personnel, and to personnel of other Federal, State, or local agencies with regulatory authority over the site. [29 CFR1910.120(b)(1)(v)]

- Comprehensive Workplan - The comprehensive workplan shall address the tasks and objectives of the site operations and the logistics and resources required to reach those tasks and objectives. The comprehensive workplan shall define anticipated clean-up activities as well as normal operating procedures which need not repeat the employer's procedures available elsewhere. [29 CFR 1910.120(b)(3)]

- Training - All employees working on-site (including but not limited to equipment operators, general laborers and others) exposed to hazardous substances, health hazards, or safety hazards, and their supervisors and management responsible for the site, shall receive training meeting the requirements of this 29 CFR 1910.120 (e)(1)(i) before they are permitted to engage in hazardous waste operations that could expose them to hazardous substances, safety, or health hazards. [29 CFR 1910.120 (e)(1)(i)]

- Medical Surveillance - A medical surveillance program shall be instituted for employees engaged in certain operations (refer to regulations). [29 CFR 1910.120

Scovill Industrial Landfill Superfund Site Map



For More Information Contact

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