



June 1, 2017

Ms. Kimberly Tisa
PCB Coordinator
U.S. Environmental Protection Agency Region 1
5 Post Office Square – Suite 100
Boston, Massachusetts 02109-3912

Re: Project Status Update
PCB Cleanup and Risk-Based Disposal Approval under 40 CFR 761.61(c) and 761.79(h)
Fairfield Ludlowe High School, Fairfield, Connecticut

Dear Ms. Tisa:

On behalf of the Town of Fairfield / Fairfield Public Schools, this letter has been prepared to provide an update on the status of activities related to the U.S. Environmental Protection Agency's (EPA's) December 10, 2015 PCB Cleanup and Risk-Based Disposal Approval under 40 CFR 761.61(c) and 40 CFR 761.79(h) ("the Approval") for the above-mentioned site.

As you may recall, the “Work” can be divided into two main components, which are considered: the Window Removal Project (windows and sealants, including adjacent soils); and the PCB-containing Interior Paint Project. With regard to the overall schedule and due to funding / approval delays at the Town level, the window project was not initiated in 2016 and is scheduled to initiate in 2017. An updated summary schedule of key milestones is provided below with further details provided in the remainder of this letter.

[illegible]



Per Condition 11 of the Approval, the window project related work is scheduled to commence on June 19, 2017.

Per Condition 12a, 12b, and 12c, signed certifications from the laboratory and the abatement contractors, as well as the Contractor's workplan is provided in Attachment A to this letter.

Per Condition 1a and 23, as well as EPA's February 29, 2016 response to the November 24, 2015 Soil Remediation Addendum, pre-removal lateral extent sampling has been conducted and a proposed modification will be submitted to EPA under separate cover. Currently, the soil removal activities are scheduled to be completed once the window work is completed (in 2018).

Per Condition 1b, as well as EPA's March 2, 2016 response to the February 29, 2016 Initial Indoor Air and Painted Masonry Sampling Plan, indoor air and surface wipe samples were collected in early Spring 2017 (conducted as part of the stabilized conditions sampling) and summary tables of the results are provided in Attachment B to this letter (laboratory reports can be provided upon request). As indicated in Attachment B, all surface wipe samples collected from painted surfaces reported PCBs as non-detect ($< 0.2 \text{ ug}/100 \text{ cm}^2$) and all indoor air concentrations were reported below the EPA's applicable published levels for the evaluation of PCBs in indoor school air. As indicated above, the Feasibility Study assessing potential remedial alternatives for the interior paint is on-going and will be submitted consistent with the Approval conditions.

If you have any questions or require further information, please feel free to contact me at (978) 482-7873 or at jhamel@woodardcurran.com.

Sincerely,
WOODARD & CURRAN INC.

Jeffrey A. Hamel, LSP, LEP
Senior Principal

cc: Salvatore Morabito, Manager of Construction, Security, & Safety
Thomas Cullen, Director of Operations

PN: 228875

Attachments

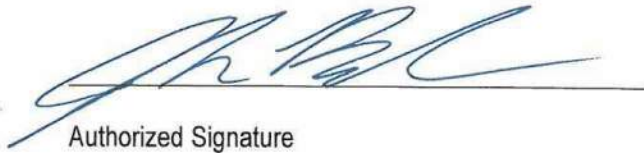


ATTACHMENT A

Certification

Pursuant to EPA's December 10, 2015 PCB Cleanup and Disposal Approval for the Fairfield Ludlowe High School Window and Door Replacement Project under 40 CFR 761.61(c) and 761.79(h) Notification and Certification Condition 12a, the required written certification, signed by the selected contractors performing the work is set forth below.

We have read and understand the Notification, as defined in EPA's December 10, 2015 Approval, and agree to abide by the conditions specified in EPA's December 10, 2015 PCB Cleanup and Disposal Approval under 40 CFR 761.61(c) and 761.79(h).



Authorized Signature

5/18/17

Date

Josh Bulens

Name of Authorized representative (print)

Project Manager

Title

Southern Middlesex Industries, Inc.

Company

**Fairfield Ludlowe High School
Window Replacement Project**

Window Unit Abatement Work Plan

1.0 Summary

- This plan will provide a guideline for the means and methods that will be implemented to complete the Asbestos/PCB abatement and disposal of window units located at Fairfield Ludlowe High School work. This project is located in the Town of Fairfield, Connecticut and will be performed in accordance with the contract documents and will abide by all Federal, State and Municipal regulations. Fairfield Ludlowe High School will be unoccupied during the implementation of this plan. This contractor work plan will serve to outline the means and methods to carry out the work required by contract documents. All Asbestos/PCB abatement work will be performed in accordance with 40 CFR Part 761, the project specifications and the conditions of EPA approval of this work.

2.0 Containment Plan

- The work area will consist of several work zones that will include an abatement zone, decontamination zone, and support zone. These regulated work zones will be demarcated to allow for SMI to control all entrances and exits to ensure only authorized personnel enter the work, prior to commencement of any Asbestos/PCB abatement work. All ground surfaces within the abatement zone will have plywood covering to protect the area where lifts will be used and will be covered with one (1) layer of 6-mil polyethylene sheeting securely fastened to the foundation. Isolation barriers will be securely installed using one (1) layer of 6-mil polyethylene sheeting on the interior of window unit being removed. A decontamination zone will be established prior to the commencement of any Asbestos/PCB abatement work. The decontamination zone will consist of a remote personal decontamination unit located within the site.

3.0 Waste Stream

PCB Bulk Product Waste with Asbestos > 50 PPM

- Disposal Facility:
Minerva Enterprises
9000 Minerva Road
Waynesburg, OH 44688
Phone (330) 866-3435
- PCB Waste Stream 1: Caulking, window frame & components, window sills and adjacent brick

PCB Remediation Waste < 50 PPM

- Disposal Facility:
EQ Wayne Disposal, Inc.
49350 North I-94 Service Drive
Belleville, MI 48111

Phone (800) 592-5329
EPA ID # MID048090633

- PCB Waste Stream 2: PPE, waste rags, polyethylene, etc.

PCB Waste Water

- Disposal Facility:
Cyn Environmental
1771 Washington Street
Stoughton, MA 02072
Phone (781) 341-5108
EPA ID # MAD082303777
- PCB Waste Stream 3: Waste water

Waste Hauler

- RED Technologies, LLC.
10 North Wood Drive
Bloomfield, CT 06002
Phone (860) 218-2428

Disposal Facilities

- Minerva Enterprises
9000 Minerva Road
Waynesburg, OH 44688
Phone (330) 866-3435
- EQ Wayne Disposal, Inc.
49350 North I-94 Service Drive
Belleville, MI 48111
Phone (800) 592-5329
EPA ID # MID048090633
- Cyn Environmental
1771 Washington Street
Stoughton, MA 02072
Phone (781) 341-5108

4.0 Means & Method

Pre-Abatement/General Abatement Procedures

- Daily toolbox safety meeting indicating site-specific job hazards to entire SMI workforce on-site.
- Building will have M/E/P/FP systems located within the abatement zone “made safe” prior to abatement.
- Temporary power and light will be install sufficient to accomplish the work in accordance with OSHA practices. The breaker location for temporary power and light will be accessible from outside the abatement zone.
- Isolation barriers will be established with one (1) layer 6-mil polyethylene sheeting (as described in section 2.0 containment plan).
- Pre-cleaning as deemed necessary by wet wiping and HEPA vacuuming.
- Post Asbestos and PCB placards on all entrances to the abatement zone.
- Erect a remote personal decontamination unit.
- All workers will don appropriated personal protective equipment inclusive of disposal coverall suits, boots, gloves and half-face respirators.

PCB Cleanup Procedures

- All Asbestos/PCB clean-up activities will be performed with proper engineering controls in place to control any visible emission of dust or debris during removal. This will include a combination of tools equipped with HEPA vacuum filtration and water misting as is practical and appropriate for each type of cleanup activity.
- All water used during cleanup activities will be collected with HEPA filter equipped vacuums and disposed of in appropriate drums in accordance with 40 CFR 761.79(b).
- All rags and other cleaning materials used to clean the area shall also be bagged for transportation from containment to onsite Asbestos/PCB waste containers and properly disposed as PCB waste.
- Asbestos/PCB contaminated dust and debris from cutting and removal of surfaces and substrates shall be immediately collected by HEPA vacuums and containerized in temporary 6-mil polyethylene disposal bags and/or drums and disposed of appropriately as Asbestos/PCB waste. No dry sweeping, dusting or blowing will be allowed.
- Upon removal generated Asbestos/PCB waste materials shall be placed in lined containers or into an appropriate temporary container such as a 6-mil polyethylene disposal bags, lined Gaylord boxes or drums for transport to Asbestos/PCB waste containers at the end of the day.
- PCB Waste Stream 1: Exterior window units and storefronts including all associated caulking, window frame & components, window sills and adjacent brick will be carefully removed by hand scrapping in a manner that does not cause it to become fine dust. The 8" of surrounding brick adjacent to window caulking to be removed will be removed by a combination of mechanical saw-cutting and hammering or by scoring the mortar joint and chipping off the brick. Material will be properly disposed of as PCB Bulk Product Waste with Asbestos > 50 PPM.
- Surfaces formally in direct contact with the PCB caulking will be coated with two (2) coats of Sikagard 62 liquid epoxy coating applied in accordance with the Notification and EPA's Approval. The epoxy will be applied using brushes and/or roller to achieve a smooth uniform coating over the surfaces. PPE, brushes and other wastes generated will be managed for disposal as < 50 PCB Remediation Waste.
- PCB Waste Stream 2: PPE, Waste Rags, Polyethylene, Etc. accumulated by the removal work will be packaged into appropriate lined Gaylord boxes and properly disposed of as < 50 PCB Remediation Waste with Asbestos.
- Upon completion of removal and packaging of all PCB waste in the abatement zone will be fine cleaned for visual inspection.
- After a passing visual inspection by the Owner's Consultant, containments and controls will be removed and properly disposed of as PCB Bulk Product Waste with Asbestos > 50 PPM.
- OSHA required personal air sampling would be performed by SMI.

5.0 Equipment Decontamination and Personal Decontamination Unit

Decontamination Stations

- **Personal Decon:** SMI will establish contiguous to the work area a decontamination enclosure consisting of equipment room, shower room and clean room. All employees will enter and exit this decon to gain access to the abatement zone.
- **Decontamination Entry:** All employees will enter the regulated work area through the clean room; all street clothing will be placed in bags and left in a designated area. Protective clothing and respiratory protection will be given to employee's prior to enter the abatement zone.
- **Decontamination Exit:** Before leaving the regulated area, workers shall remove all gross contamination and debris from their protective clothing. Workers shall remove their protective clothing in the equipment room and discard it in a labeled bag. Workers will then proceed to the shower unit and then remove their respirators once inside the shower. After showering, employees shall proceed to the clean room to change into their street clothes. All wastewater will be collected and disposed of as Asbestos/PCB Waste.

Decontamination Procedures

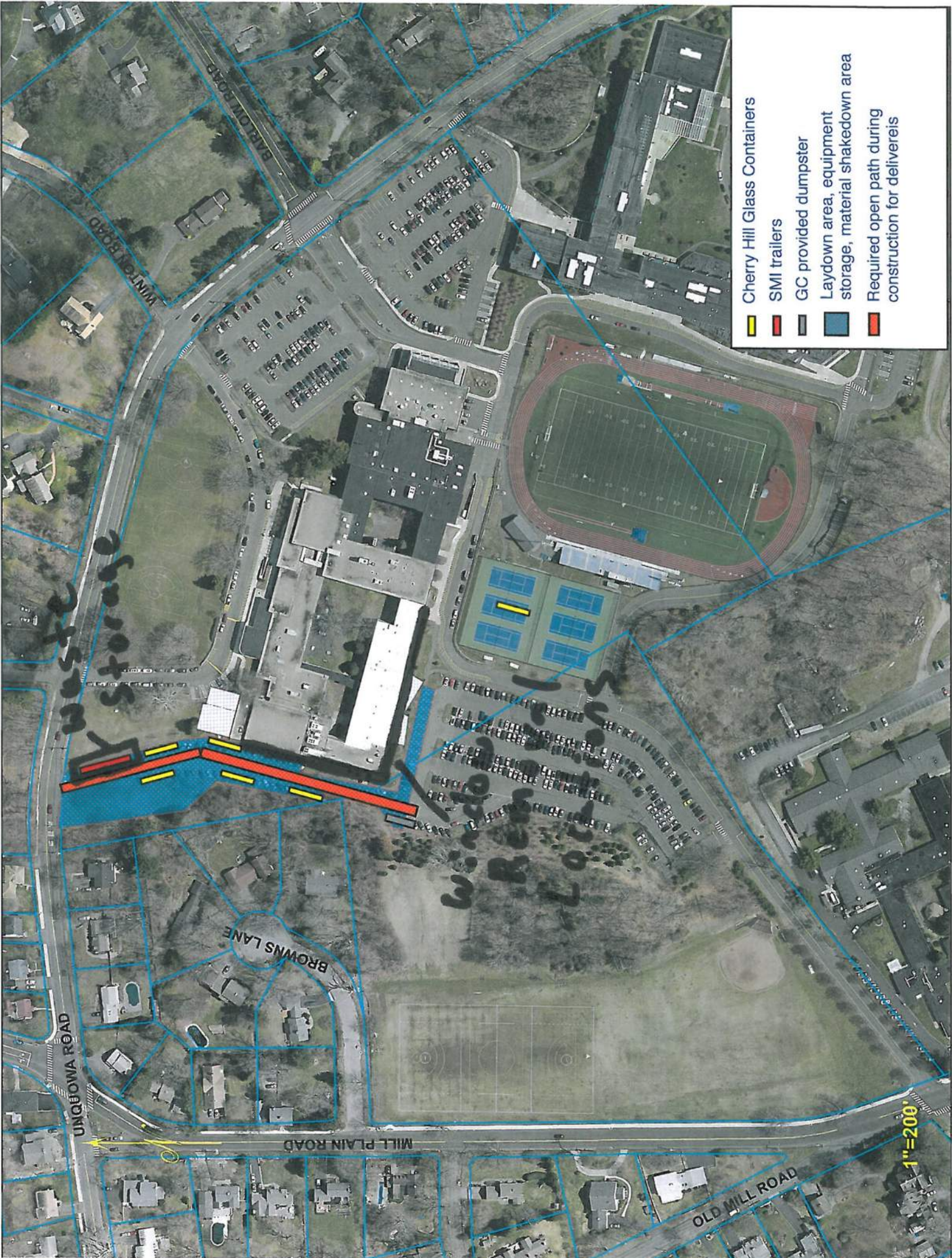
- All equipment and tools will be thoroughly cleaned in accordance with Subpart S of 40 CFR Part 761.372. All rags generated during decontamination will be collected and drummed for disposal as Asbestos/PCB Waste.

Submitted By: Josh Bulens

Date: 5/18/17

Signature: *Josh Bulens*

Title: Project Manager



	Cherry Hill Glass Containers
	SMI trailers
	GC provided dumpster
	Laydown area, equipment storage, material shakedown area
	Required open path during construction for deliveries

1"=200'

Certification

Pursuant to EPA's December 10, 2015 PCB Cleanup and Disposal Approval for the Fairfield Ludlowe High School Window and Door Replacement Project under 40 CFR 761.61(c) and 761.79(h) Notification and Certification Condition 12b, the required written certification, signed by the selected contractors performing the work is set forth below.

We have read and understand the extraction and analytical method requirements and the quality assurance requirements in the Notification, as defined in EPA's December 10, 2015 Approval, and agree to abide by the conditions specified in EPA's December 10, 2015 PCB Cleanup and Disposal Approval under 40 CFR 761.61(c) and 761.79(h).



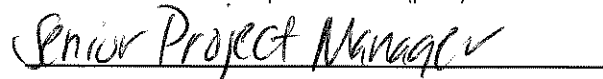
Authorized Signature



Date



Name of Authorized representative (print)



Title



Company



ATTACHMENT B

Table 1
Summary of Surface Wipe Sampling Results - April 2017

Fairfield Ludlowe High School

Building Area	Location	Wipe Sample ID	Sample Date	Total PCBs (µg/100cm²)
1950	Room 129 - Ground Floor	FLHS-VWP-001	4/8/2017	< 0.20
	Office-Admin Area - 1st Floor	FLHS-VWP-010	4/8/2017	< 0.20
	Room 361 Textile Lab - 2nd Floor	FLHS-VWP-016	4/8/2017	< 0.20
1961-62 West	Cafeteria - 1st Floor	FLHS-VWP-008	4/8/2017	< 0.20
	Room 232 Classroom - 1st Floor	FLHS-VWP-012	4/8/2017	< 0.20
	Room 237 Lab - 1st Floor	FLHS-VWP-003	4/8/2017	< 0.20
	Room 320 Classroom - 2nd Floor	FLHS-VWP-015	4/8/2017	< 0.20
	Room 326 Classroom - 2nd Floor	FLHS-VWP-005	4/8/2017	< 0.20
1961-62 East	Room 112 (Computer Lab) - Ground Floor	FLHS-VWP-009	4/8/2017	< 0.20
	Room 213 Lab - 1st Floor	FLHS-VWP-013	4/8/2017	< 0.20
	Room 220 Classroom - 1st Floor	FLHS-VWP-004	4/8/2017	< 0.20
	Room 306 - 2nd Floor	FLHS-VWP-007	4/8/2017	< 0.20
	Room 368 - 2nd Floor	FLHS-VWP-017	4/8/2017	< 0.20
1971-72 West	Room 151 - Ground Floor	FLHS-VWP-018	4/8/2017	< 0.20
	Room 248 - 1st Floor	FLHS-VWP-011	4/8/2017	< 0.20
	Room 345 - 2nd Floor	FLHS-VWP-014	4/8/2017	< 0.20
1971-72 East	East Side Hallway - Ground Floor	FLHS-VWP-002	4/8/2017	< 0.20

Notes:

Surface wipe samples collected using a hexane saturated gauze over a 100 cm² area in accordance with the standard wipe test methodology of 40 CFR 761.123.

Table 2
Summary of Indoor Air Sampling Results - April 2017

Fairfield Ludlowe High School

Building Wing	Location	Air Sample ID	Sample Date	Total PCB Concentration (ng/m ³)	PCB Homologs		
					Tetrachloro biphenyls	Pentachloro biphenyls	Hexachloro biphenyls
1950	Office-Admin Area - 1st Floor	FLHS-IAS-005	4/8/2017	< 5.0			
	West Side Hallway - 1st Floor	FLHS-IAS-006	4/8/2017	7.4	X	X	
	Room 361 Textile Lab - 2nd Floor	FLHS-IAS-012	4/8/2017	24	X	X	X
1971-1972 Area	West Wing; Room 151 - Ground Floor	FLHS-IAS-001	4/8/2017	< 5.0			
	East Wing; East Side Hallway - Ground Floor	FLHS-IAS-003	4/8/2017	16	X	X	
	West Wing; Room 248 - 1st Floor	FLHS-IAS-007	4/8/2017	< 5.0			
	West Wing; Room 345 - 2nd Floor	FLHS-IAS-010	4/8/2017	18	X	X	
1961-1962 Area	West Wing; Cafeteria - 1st Floor	FLHS-IAS-002	4/8/2017	4.4	X	X	
	East Wing; Room 112 (Computer Lab) - Ground Floor	FLHS-IAS-004	4/8/2017	6.5	X	X	
	East Wing; Room 368 - 2nd Floor	FLHS-IAS-013	4/8/2017	65	X	X	X
	West Wing; Room 232 Classroom - 1st Floor	FLHS-IAS-008	4/8/2017	244	X	X	X
	West Wing; Room 320 Classroom - 2nd Floor	FLHS-IAS-011	4/8/2017	38	X	X	X
	East Wing; Room 213 Lab - 1st Floor	FLHS-IAS-009	4/8/2017	98	X	X	X
Ambient/ Outside	West Courtyard	FLHS-IAS-014	4/8/2017	< 5.0			

Notes:

1. Air samples collected in accordance with USEPA Compendium Method TO-10A and submitted for laboratory analysis of PCBs homologs.
2. The flow rate displayed is the average flow rate as measured at the beginning and end of the sampling period.
3. Sample volume is corrected to standard temperature and pressure in accordance with Section 13.1.7 of Method TO-10A.
4. Total PCB concentration is the total PCB homologs reported by the lab (ng/cartridge) per corrected sample volume (m³/cartridge).
5. Specific homolog groups are noted; if not listed, then the homolog group was not detected in any of the samples