

DRAFT

ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES

FAIRFIELD HILLS CAMPUS

STRATFORD AND DUPLEX 58 BUILDINGS

NEWTOWN, CONNECTICUT

PREPARED FOR:

TOWN OF NEWTOWN

NEWTOWN, CONNECTICUT

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Table of Contents

1	Introduction	1
1.1	Purpose and Scope	1
2	Site Description and History	1
3	Hazardous Substances On-Site	2
3.1	Asbestos-Containing Materials.....	3
3.1.1	Stratford Building.....	3
3.1.2	Duplex 58	3
3.2	Lead-based Paint	4
3.3	Miscellaneous Hazardous Substances.....	4
4	Nature of Threat to Public Health	5
5	Cleanup Standards	5
6	Applicable Laws and Regulations.....	6
6.1	Asbestos Laws and Regulations	6
6.2	Lead-Based Paint Laws and Regulations.....	7
6.3	Miscellaneous Hazardous Substances Laws and Regulations	8
7	Analysis of Cleanup Alternatives	8
7.1	Alternative 1: No-Action Alternative Analysis	9
7.2	Alternative 2: Removal of High Risk Asbestos and Lead-Based Paint Analysis	10
7.3	Alternative 3: Abate all Asbestos-Containing Materials and Lead-Based Paint Analysis 11	
8	Alternatives Evaluation and Recommendation	11
9	Authorization and Implementation	12

Tables

Table 1: Summary of Evaluation Criteria 12

Table 2: Alternative Costs 12

Figures

Fairfield Hills Location Map

Fairfield Hills Trails, Concept Plan

1 Introduction

This document presents an Analysis of Brownfields Cleanup Alternatives (ABCA) for the Stratford and Duplex 58 buildings at the Fairfield Hills Property in the Town of Newtown, Connecticut. This ABCA was prepared by R. W. Bartley & Associates, Inc. (RWB&A) on behalf of the Town of Newtown as part of the receipt of an EPA Brownfields Grant. Notice of this document has been published, and this document has been made available for public comment, in accordance with the community relations plan of the EPA Brownfields Grant and requirements of the National Contingency Plan (NCP).

1.1 Purpose and Scope

Under The EPA Brownfields Grant, recipients must supply an ABCA that includes:

- Information about the site and contamination issues (i.e., exposure pathways, identification of contaminant sources, etc.), cleanup standards, applicable laws, alternatives considered, and the proposed cleanup;
- Effectiveness, implementability, and the cost of alternatives, including the preferred or proposed cleanup alternative;
- A comparative analysis of the alternatives considered; and
- Assessment of whether additional land-use controls will be necessary after the environmental cleanup is complete.

2 Site Description and History

The Fairfield Hills Campus is part of the former State of Connecticut Mental Health Hospital property. The campus is located to the south of Wasserman Way in Newtown, Connecticut (see the attached "Fairfield Hills-Location Map"). The hospital was operated by the State of Connecticut from the mid 1930s until it was closed in 1996. The property was farmland prior to the purchase and development of the property by the state.

The portion of the property that contained the institutional buildings, the "campus" portion of the property and a portion of the property along Deep Brook was offered by the State of Connecticut to the Town of Newtown for purchase. As part of the offer the environmental remediation of soil and groundwater contamination; and the removal of hazardous materials and asbestos-containing materials were to be the responsibility of the town.

After deliberation by town officials, study by a committee established by the town, and public input, the town decided to purchase the property and created a master plan of redevelopment. The master plan indicated a mix of town use and private use. Private use is to be through the renovation and leasing of existing buildings with the town retaining ownership of the buildings and land.

Environmental remediation of the soil and groundwater to State of Connecticut Department of Environmental Protection standards is complete and redevelopment is underway. One building was demolished and a town baseball field was constructed in its place. Prior to demolition of the building, hazardous substances and asbestos-containing materials were removed from the building in accordance with state regulations and guidance. Hazardous substances and asbestos-containing materials were removed and a second building which was demolished to make way for the construction of a private indoor athletic facility.

Currently a third building is being renovated for use as a new municipal office building. Prior to starting the renovation, hazardous substances and asbestos-containing materials were also removed from this building. Also, hazardous substances and asbestos-containing materials were removed from a fourth building that was demolished to construct a parking area to serve the new municipal office building, the town baseball field, and the private indoor athletic facility.

Private concerns have expressed interest in leasing and renovating existing buildings for various enterprises, but no deals have been consummated. This is likely, in a large part, due to the poor economy and lack of financing, but also because of the cost of building renovations. A significant portion of the cost of these renovations is the removal of hazardous substances and asbestos-containing materials from the buildings.

In the fall of 2007 the Town applied to the Federal Environmental Protection Agency (EPA) for an EPA Brownfields Grant to remove hazardous substances and asbestos-containing materials from the Stratford building; and Duplex 58, if there was sufficient money to do both buildings. See the attached annotated "Fairfield Hills' Trails, Concept Plan" figure for the locations of the buildings on the Fairfield Hills Campus. The purpose of this project is to eliminate the potential exposure of the public, town personnel, and contractors to these materials, and to facilitate the leasing and renovations of these buildings by lowering the cost of renovation to private party/enterprise(s).

In the summer of 2008, the town was awarded \$200,000 for this project. This EPA Brownfields Grant is being used to provide project coordination; provide community outreach services; secure an environmental engineering consultant to prepare this ABCA, an Asbestos Hazard Emergency Response Act (AHERA) asbestos sampling inspection, hazardous substances and asbestos-containing materials removal specifications, to oversee and monitor the removals; and to pay for the removal and disposal of the materials.

3 Hazardous Substances On-Site

The hazardous materials at the buildings include asbestos-containing building materials, lead-based paint, and building components and contents containing miscellaneous hazardous substances as summarized below. The inventory of hazardous materials at the buildings were estimated by performing an initial assessment of asbestos-containing materials by a Connecticut certified asbestos inspector, sampling inspections of lead-based paint of similar

campus buildings, and general industry knowledge of materials and equipment containing hazardous substances. A complete sampling inspection and inventory of asbestos-containing building materials, lead-based paint, and building components and contents containing miscellaneous hazardous substances will be performed for these buildings as part of the preparation of the abatement plans and specifications to be completed following the determination of the preferred alternative for abatement.

3.1 Asbestos-Containing Materials

A Connecticut Certified Asbestos Inspector from TRC Environmental Corporation performed an initial assessment of the Stratford building and Duplex 58 in 1999. The asbestos-containing materials based upon this assessment in each of the buildings is estimated as follows:

3.1.1 Stratford Building

Material	Estimated Quantity
Pipe insulation	812 LF ¹
Ceiling tile debris on floors	700 SF ²
Glue daubs on ceiling tile	8,300 SF
Window glazing and caulk	55 Windows
Transite roof shingles	3,000 SF
Layered roofing/flashing	800 SF

3.1.2 Duplex 58

Material	Estimated Quantity
Pipe insulation	272 LF
Floor tiles and mastic	912 SF
Window glazing and caulk	42 Windows
Transite roof shingles	3,600 SF

Asbestos is a concern because asbestos minerals have a tendency to separate into microscopic-size particles that can remain in the air and are easily inhaled. Persons occupationally exposed to asbestos have developed several types of life-threatening diseases, including asbestosis and lung cancer. Although the use of asbestos and asbestos products has dramatically decreased, they are still found in many residential and commercial settings and continue to pose a health risk to workers and occupants.

Exposure to asbestos would be likely to occur in those areas identified as containing friable asbestos-containing materials. Since the asbestos-containing materials identified are currently

¹ Linear feet
² Square feet

damaged or have the potential for significant damage, it may be assumed that airborne asbestos fibers are present in the buildings and will continue to be present in the buildings, if the asbestos-containing materials are not abated. The main exposure pathway in this case would be inhalation of airborne particles for those inside the buildings. Additional exposure could occur through ingestion. Indirect exposure could occur through transport of asbestos particles out of the buildings on occupants' clothing or hair, with subsequent inhalation (or ingestion).

Additional exposure to asbestos can be expected from identified areas of non-friable asbestos-containing materials, if any future maintenance or renovation activities will result in damage to these materials. Such damage could occur during activities such as drilling or cutting of existing asbestos-containing flooring/mastic material. Typical maintenance activities such as floor polishing or buffing could also cause release of fibers. Under these conditions, the exposure pathways would be the same as described above.

3.2 Lead-based Paint

Lead-based paint surveys of Fairfield Hills Campus buildings have shown that the white trim paint on the buildings contain significant concentrations of lead. The lead content of Interior paints varies.

Exposure pathways for lead-based paint include inhalation and ingestion of lead dust from the deterioration of lead-based paint and ingestion of paint chips or paint. Increased levels of the metal lead in the blood due to inhalation or ingestion of lead may cause irreversible neurological damage as well as renal disease, cardiovascular effects, and reproductive toxicity.

3.3 Miscellaneous Hazardous Substances

Regulated hazardous substance can be contained in the following building components, and materials that may remain in the buildings. Below are items that may remain in the buildings that can contain hazardous substances:

- Mercury Lamps from fluorescent or mercury vapor light fixtures
- PCB/DEHP Ballasts from fluorescent light fixtures
- Smoke detectors
- Exit signs
- Water fountains
- Mercury Thermostat Ampules
- Halogen bulbs
- Unknown liquids
- Disinfectants
- Transformers
- Fire alarm control panels
- Batteries
- Fuel sensor control panels
- Emergency lighting control panels
- Flood lamps

Exposure pathways to regulated hazardous substances contained in the building components and materials remaining in the building will depend upon the state of the hazardous substance but can include inhalation, ingestion, and dermal contact. Health effects to these exposures will vary by the substance, the type of contact, and the level and duration of the exposure.

4 Nature of Threat to Public Health

The current threat to public health is the exposure to asbestos, lead-based paint dust, and miscellaneous hazardous substances by individuals entering the building. Certain asbestos-containing materials and lead-based paint in the buildings are in poor condition that could cause the release of asbestos fibers to the air, and lead paint chips to building floors and surfaces. Lead dust can be created by walking on and disturbing lead-based paint chips on the floors of the buildings.

These buildings are currently vacant and are slated for redevelopment that will involve renovation of the buildings. Under current conditions, risk pathways include: ingestion, and inhalation of potentially hazardous materials and substances by site visitors and/or trespassers.

During any renovation or demolition activities, asbestos-containing materials, lead-based paint, and miscellaneous hazardous substances remaining in the building will potentially pose an exposure risk to site construction workers through inhalation, ingestion, and contact.

5 Cleanup Standards

Even though cancer risk from exposure to asbestos is most appropriately viewed as a chronic concern, short-term standards have been established by OSHA to limit exposures of workers in the workplace. There are two types of short-term limits, as follows:

STEL (Short-term exposure limit): 1.0 PCM f/cc (fibers per cubic centimeters as detected using phase-contrast microscopy)

TWA PEL (8- hr time-weighted average permissible exposure level): 0.1 PCM f/cc (Source: USEPA, 2003 - Libby Asbestos Site Residential/Commercial Cleanup Action Level And Clearance Criteria Technical Memorandum, Draft Final - December 15, 2003).

EPA AHERA regulations, (40 CFR 763) require aggressive clearance sampling after asbestos abatement activity. Leaf blowers and fans are used to disturb interior air and air samples are collected according to the standard method set forth in Appendix A of Subpart E of 40 CFR Part 763. The clearance criteria as set forth in this regulation are:

- PCM clearance criteria (for small areas): 0.01 f/cc
- TEM clearance criteria: 70 structures/mm² on the filter, or no significant increase from exterior air sample results

Although AHERA regulations apply to abatement in schools, the same standards are generally used for all abatement projects.

The USEPA issued a final rule regarding dangerous levels of lead in pre-1978 housing and children-occupied buildings January 5, 2001 (40CFR Part 745). Under the new standards, lead is considered a hazard if there are greater than:

- 40 micrograms of lead in dust per square foot on floors;
- 250 micrograms of lead in dust per square foot on interior window sills and
- 400 parts per million (ppm) of lead in bare soil in children's play areas or 1200 ppm average for bare soil in the rest of the yard.

6 Applicable Laws and Regulations

The following are applicable laws and regulations for asbestos-containing materials, lead-based paint, and materials containing miscellaneous hazardous substances.

6.1 Asbestos Laws and Regulations

Asbestos is regulated by the AHERA, the Toxic Substances Control Act (TSCA), the Clean Air Act (CAA), and Regulations of Connecticut State Agencies (RCSA), Sections 19a-14, 19a-17, 19a-332 to 19a-333, 20-435 to 20-442.

Further, to protect asbestos abatement workers all asbestos abatement work must be performed in accordance with Occupational Safety and Health Administration (OSHA) asbestos regulations as promulgated in Title 29 of the Code of Federal Regulations (29CFR), Section 1926.1101.

The following work practices should be followed whenever demolition/renovation activities involving asbestos-containing materials occur:

- Prepare abatement specifications by a Connecticut Department of Public Health licensed Asbestos Designer;
- Notify the Connecticut Department of Public Health of intention to demolish/renovate by the required notification form and receive approval for abatement activities;
- Remove all asbestos-containing materials from facility being demolished or renovated before any disruptive activity begins;
- Handle and dispose of all asbestos-containing materials in an approved manner (USEPA, 2006a; Asbestos/NESHAP Regulated Asbestos-Containing Materials Guidance);

- Monitor asbestos abatement activities by a Connecticut Licensed Asbestos Abatement Supervisor;
- Perform air clearance testing upon completion of asbestos-containing materials abatement; and
- Prepare an asbestos abatement Compliance Report.

6.2 Lead-Based Paint Laws and Regulations

Lead-based paint in pre-1978 housing and children-occupied buildings is regulated under the authority of the Toxic Substances and Control Act (TSCA; 15 U.S.C. 2601 et seq.) as amended by the Residential Lead-Based Paint Hazard Reduction Act of 1992, generally referred to as Title X (of The Housing and Community Act of 1992 - Public Law 102-550). Title X mandates the training, certification and licensing of lead-based paint abatement contractors, inspectors, risk assessors, and the training and certification of abatement workers and project designers. The Act also amended the Toxic Substances Control Act section 402 & 403. The provisions of Title X apply to residential buildings and child-occupied facilities.

The USEPA issued a final rule regarding dangerous levels of lead in pre-1978 housing and children-occupied buildings on January 5, 2001 (40CFR Part 745). Under the new standards, lead is considered a hazard if there are greater than:

- 40 micrograms of lead in dust per square foot on floors;
- 250 micrograms of lead in dust per square foot on interior window sills and
- 400 parts per million (ppm) of lead in bare soil in children's play areas or 1200 ppm average for bare soil in the rest of the yard .

The Connecticut Department of Public Health regulates and licenses lead paint consultants and workers under RCRA Sections 20-474 through 20-482 and lead-containing debris must be handled in accordance with the USEPA RCRA Hazardous Waste Regulations (40 CFR Parts 260 through 274), and the Connecticut Department of Environmental Protection Hazardous Waste Regulations (22a-209-1 and 22a-449(c).

The Occupational Safety and Health Administration has published regulations regarding worker safety during activities involving lead-based paint abatement. The Construction Standards (29 CFR Part 1926) and the Occupational Safety and Health Standards (29 CFR Part 1910) promulgate a permissible exposure limit for lead construction workers, including workers performing demolition, salvage, or renovation of lead-containing materials at sections 1926.62 and 1910.1025 as follows:

“The employer shall assure that no employee is exposed to lead at concentrations greater than fifty micrograms per cubic meter of air (50 ug/m³) averaged over an 8-hour period.” (29 CFR 1926.62)

Additional regulations under these chapters address other worker safety precautions such as respiratory protection programs, work practices, and medical monitoring.

Lead-based paint debris (material containing or surfaced with lead-based-paint) from commercial buildings may be classified as hazardous waste if lead concentrations exceed the Toxicity Characteristic Rule (40 CFR 261.24, 40 CFR 262.11) concentration limit of 5.0 mg/L in sample extract prepared according to the Toxicity Characteristic Leaching Procedure, test Method 1311 in “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods,” EPA Publication SW-846.

6.3 Miscellaneous Hazardous Substances Laws and Regulations

Activities involving building components and materials left in the building that may contain miscellaneous hazardous substances shall be performed in accordance with, but not limited to, the current revision of the USEPA & Connecticut Department of Environmental Protection Hazardous Waste Regulations (40 CFR 260-282, 22a-209 and 22a-449(c)), USEPA PCB Regulations (40 CFR 761), USEPA Protection of Stratospheric Ozone (40 CFR 82), OSHA Hazard Communication (29 CFR 1910.1200), OSHA Hazardous Waste & Emergency Response Regulations (29 CFR 1910.120), USDOT Hazardous Materials Regulation (49 CFR 171-180), OSHA, RCRA, CERCLA, CAA, TSCA, and all other laws and regulations.

7 Analysis of Cleanup Alternatives

Reasonable Alternatives for hazardous substances abatement considered for the Fairfield Hills Stratford and Duplex 58 buildings include the Alternative 1 the No-Action Alternative; Alternative 2 consisting of removal of high-risk asbestos-containing materials, building components and materials remaining in the buildings containing miscellaneous hazardous substances, and lead-based paint; and Alternative 3 consisting of complete removal/abatement of existing asbestos-containing material and lead-based paint, and removal of building components and materials remaining in the buildings containing miscellaneous hazardous substances,. The Town of Newtown prefers Alternative 2 as the method of cleanup for the buildings. A short summary of each of these alternatives is provided below:

Alternative 1: No-Action. A no-action alternative would leave the buildings in their present condition, making them unusable for use, and difficult to obtain private interest for the renovation and reuse of the building. The only advantages to no action are those related to immediate avoidance of expenses that would be incurred by taking action. However, in the long term, expenses associated with no action may exceed those related to taking action at the present time due to the continued deterioration of the condition of the buildings and an inability to lease the building for renovation and reuse. Leasing and renovation of the building will

eliminate potential impacts to human health and the environment due to its present condition and generate funds for hazard abatement and reuse of other buildings on the campus.

Alternative 2: Removal of High Risk Asbestos, Lead-Based Paint, and Miscellaneous Hazardous Materials: This alternative would address deteriorated and friable asbestos-containing materials and deteriorated lead-based paint in the interior of the buildings including asbestos pipe insulation, asbestos floor tiles and mastic, asbestos ceiling tiles and/or associated glue daubs, lead-based paint chips, and peeling lead-based paint. This alternative will also remove miscellaneous hazardous substances contained in the buildings.

Alternative 3: Removal all Asbestos-Containing Materials, Lead-Based Paint and Miscellaneous Hazardous Materials: This option would include all of the activities associated with Alternative 2 but also include removal of asbestos-containing window caulking and glazing, removal of asbestos transite roofing shingles and roofing tars, and removal of all lead-based paint. This alternative has all of the advantages of Alternative 2 and has the additional advantage of the removal of all asbestos and lead-based paint. The disadvantage of this alternative is that: the removal of window caulking and glazing will destroy the windows and the destruction of the windows and the removal of the roofing tiles will accelerate the weather-related deterioration of the buildings. The removal of window caulking and glazing, roofing tiles, and lead-based paint in good condition will not appreciably lower the risk to individuals entering the building because these materials are intact and in relatively good condition which limits the airborne release of asbestos and lead.

The objective of the Fairfield Hills Stratford and Duplex 58 buildings Brownfields Cleanup Project is to reduce or eliminate the potential exposure to asbestos, lead, and miscellaneous hazardous substances for individuals entering the buildings, and to facilitate the private leasing and renovation/reuse of the buildings. The following sections describe the three alternatives considered in terms of their effectiveness, feasibility of implementation, and costs with regard to achieving the project objectives.

7.1 Alternative 1: No-Action Alternative Analysis

Effectiveness: The effectiveness of the No-Action alternative in achieving project goals would be negligible. The continued presence of asbestos-containing materials, lead-based paint, and miscellaneous hazardous substances in buildings, as would be the case under the no-action alternative, would pose a long-term health risk to the public and also to workers entering the buildings. Also, the presence and projected costs of removal of the materials will make it difficult to obtain private interest in leasing and renovating/reusing the buildings. The no-action alternative would be highly ineffectual in achieving the goals of reduction of health risks and facilitating the renovation/reuse of the buildings.

Implementation: Implementation of the No-Action alternative would be fairly straightforward. The buildings would be left in the current unused state in which they currently exist. The identified

asbestos-containing materials and lead-based paint would still pose a hazard to those entering the buildings.

Transfer and/or lease of the property to other parties would require notification of the presence of asbestos-containing materials, lead-based paint, and miscellaneous hazardous substances; and controls would be necessary to manage exposure to those entering the buildings.

Under the No-action Alternative, if the buildings remain unused for an extended period of time, the buildings will continue to deteriorate increasing the risk to those entering the buildings and making it more difficult to obtain private interest in leasing and renovating/reusing the buildings. The value of the buildings will decrease due to deterioration unless they are regularly maintained.

Cost: Direct costs associated with the No-Action Alternative and associated non-use of the buildings would consist of providing site security. Indirect costs could include the continuing inability to obtain private interest for the leasing and renovation/reuse of the buildings.

7.2 Alternative 2: Removal of High Risk Asbestos and Lead-Based Paint Analysis

Alternative 2 would involve removal of deteriorated and friable asbestos-containing materials, and deteriorated lead-based paint from the interior of the buildings including asbestos pipe insulation, asbestos floor tiles and mastic, asbestos ceiling tiles and/or associated glue daubs, lead-based paint chips, and peeling lead-based paint. Miscellaneous hazardous substances will also be removed. Non-friable transite roofing tiles and window caulking/glazing, and interior paint in good condition would not be removed.

Effectiveness: Alternative 2 would be effective at removing asbestos-containing materials, lead-based paint, and miscellaneous hazardous substances related health hazards to individuals entering the buildings. Alternative 2 will also facilitate the leasing and reuse/renovation of the buildings by lowering the cost of renovation/reuse and removing the stigma of deteriorating asbestos and lead-based paint and making the interior of the buildings much more presentable to private interests. However, if any future renovation were to take place that would disturb the remaining asbestos-containing materials, the asbestos-containing materials would have to be removed prior to such renovation.

Implementation: Implementation of Alternative 2 would be performed by certified asbestos and lead abatement contractors. Approximately 1,084 LF of friable asbestos pipe insulation, 700 SF of asbestos tile debris, 912 SF of floor tile and mastic, and 830 SF of ceiling tile and associated glue daubs would be removed. In addition, interior lead-based paint chips and loose lead-based paint would be removed. Miscellaneous hazardous substances will also be removed by the abatement contractor performing asbestos and lead-based paint removal.

Cost: A State of Connecticut Department of Public Works approved asbestos abatement contractor has estimated the cost of this work using established state/municipal contract rates at approximately \$100,000 for the Stratford building and \$50,000 for Duplex 58. In addition AHERA sampling and analysis of the buildings, paint XRF sampling of paint, inspection report preparation, and management and asbestos abatement monitoring/reporting costs are estimated at \$50,000 for a total estimated cost of \$200,000.

7.3 Alternative 3: Abate all Asbestos-Containing Materials and Lead-Based Paint Analysis

Alternative 3 would completely abate all asbestos-containing materials and lead-based paint from the buildings.

Effectiveness: Alternative 3 would be highly effective in achieving the goal of reduction potential exposures to asbestos and lead for individuals entering the buildings. Alternative 3 would not be effective for the goal of facilitating the leasing and renovation/reuse of the buildings for removal of the transite roofing and the destruction of the windows would lead to rapid weather-related deterioration of the buildings.

Implementation: Implementation of Alternative 3 would be performed by certified asbestos and lead abatement contractors. In addition to the asbestos-containing materials and lead-based paint to be removed in Alternative 2, removal of asbestos-containing window caulking and glazing, removal of asbestos transite roofing shingles and roofing tars, and removal of all lead-based paint including paint in good condition would be removed. This includes approximately 97 windows, 800 SF of layered roofing/flashing, and 6,600 SF of transite roofing shingles.

Cost: The removal of these materials is estimated to cost an additional \$150,000 for total cost for the alternative of \$350,000.

8 Alternatives Evaluation and Recommendation

An Analysis of Brownfields Cleanup Alternatives (ABCA) has been performed for hazardous substances abatement alternatives at the Town of Newtown Fairfield Hills Stratford and Duplex 58 buildings that are to be addressed using monies provided by the EPA Brownfields Grant. Three alternatives were considered for implementability, cost, and effectiveness:

1. No Action
2. Removal of High Risk Asbestos, Lead-Based Paint, and Miscellaneous Hazardous Substances.
3. Abate all Asbestos-Containing Materials, Lead-Based Paint, and Miscellaneous Hazardous Substances.

Based upon an evaluation of these criteria, it is determined that Alternative 2 Removal of High Risk Asbestos, Lead-Based Paint and Miscellaneous Hazardous Substances, is the preferred alternative. It meets the implementability and effectiveness criteria at a cost that is compatible with the funds available. Neither of the other two options meets both of these criteria. Alternative 1 does not meet the effectiveness criteria. Alternative 3 meets the effectiveness criteria, and is slightly more effective, but cannot be implemented because of unacceptable consequences and cost. The evaluation is summarized in the tables below.

Table 1: Summary of Evaluation Criteria

Alternative		Effectiveness	Implementability
1	No Action	Not Effective	Implementable
2	Removal of High Risk Asbestos and Lead-Based Paint	Effective	Implementable
3	Abate all asbestos-containing materials and lead-based paint	Effective	Not Implementable

Table 2: Alternative Costs

Alternative		Cost
1	No Action	N/A
2	Removal of High Risk Asbestos and Lead-Based Paint	\$200,000
3	Abate all asbestos-containing materials and lead-based paint	\$350,000

9 Authorization and Implementation

The Town of Newtown, as a government entity is authorized under CERCLA 104(k) to perform cleanup activities at the Fairfield Hills Campus. The site is eligible as it is not listed or proposed for listing on the National Priorities List. It is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA. It is not subject to the jurisdiction custody, or control of the United States government.

The Town of Newtown has contracted with R.W. Bartley & Associates, Inc. for consulting services on the project. Preliminary assessments of the quantities of asbestos-containing

materials have been performed by a State of Connecticut Licensed Asbestos Inspector from TRC Environmental Corporation and BesTech, Inc., a Connecticut Department of Public Works asbestos contractor, and abatement cost estimates have been prepared by BesTech, Inc.

Upon completion of the comment period, consideration of comments, and final decision of the Town of Newtown, the selected cleanup will be implemented. Implementation will consist of the performance of detailed asbestos-containing materials and lead-based paint sampling inspections of the buildings, the preparation of abatement plans and specifications, implementation of the abatement by award under State of Connecticut existing asbestos and lead abatement contracts containing fixed rates, notification of abatement to the CTDPH, the monitoring of the abatement work including clearance sampling, and the production of post-abatement compliance reports.

Sufficient grant funds may not be available to complete work on both buildings. In addition to the costs detailed herein there are other administrative and engineering costs such as costs associated with public participation and the costs for initial planning and engineering. Also, actual bids and costs may exceed estimates. Should sufficient funds not be available the work at the Stratford building will take precedence over the Duplex 58 building; and removal of friable asbestos and lead paint chips shall take precedence over removal of non-friable asbestos at the Duplex 58 building.

The Brownfields Cleanup will conform to all applicable Federal and State laws. Connecticut certified asbestos and lead inspectors, designers, abatement contractors will be used to perform all abatement activities.

