1. Introduction

1.1 Background

CERCLA Emergency Response at a mill building fire of unknown origin. EPA support was requested by the Connecticut Department of Energy and Environmental Protection (CTDEEP) on June 13, 2020 at approximately 22:00 hrs.

1.1.2 Site Description

The three alarm fire was at the abandoned multi-story, Star Pin mill complex on Canal Street in Shelton, Connecticut. The City Of Shelton Fire Department (FD) originally received notice of the fire at 19:30 hrs, dispatched to the incident, and initiated fire fighting activities. Fire-fighting efforts continued through the night. By the morning of June 14, the fire had been brought under control, and the FD continued to address small “hot spots” that would flare up.

Initial reports provided by CTDEEP indicated that a portion of the building, due to the fire, may have collapsed into the Housatonic River and that the building contained asbestos, containerized hazardous substances and fuel oil in above ground storage tanks.

1.1.2.1 Location

The Site is located at 273 Canal Street in Shelton, CT. It is the former Star Pin Company that had been built in 1875. The mill is a historic complex, and had been abandoned for the last 15 years.

The rear of the mill complex runs adjacent to the Housatonic River and it is bounded by commercial businesses to the north west, a large residential complex approximately 500 feet to the south east and with the Boys and Girls Club of Shelton and other mixed residential commercial properties to the west.

1.1.2.2 Description of Threat

On 6/13, CTDEEP requested EPA assistance to assess possible releases of hazardous substances caused from the building fire into the environment. A report provided by the FD indicated that hundreds of containerized hazardous substances were stored in a centralized area of the mill basement. The contaminant list report was generated in May 2020 by US Ecology for the City of Shelton as part of the future hazardous materials remediation.

The list of these containers indicates that the containers, ranging from small container to 55-gallon drums, contain oils, acids, caustics, flammable liquids and oxidizers. The inventory also indicates the presence of several fuel oil tanks, electrical transformers and other unknown bagged material. According to discussions between the OSC and US Ecology these substances were scheduled to be transported off site for disposal starting June 22.

1.1.2.3 Current State of Connecticut Remediation Funding
2. Current Activities

2.1 Operations Section

2.1.1 Narrative

OSC Hatzopoulos was deployed at approximately 22:30 on June 13. Upon arrival at the Site, the OSC integrated into Unified Command with the FD, and CTDEEP. The OSC also surveyed the area and surrounding community that may have been impacted by the fire and reported that although the building complex was completely destroyed by the fire, the fire did not spread outside the mill complex. Because the fire was under control at the time of the EPA involvement, air monitoring was not warranted. Sample collection of debris around the building and fire fighting runoff water was also not conducted by EPA based on consultation with CTDEEP. The OSC also briefly met with the Mayor of the City of Shelton.

The OSC departed at approximately 10:00 on June 14. EPA will continue to coordinate with CT DEEP until all hazardous materials are safely contained and subsequently transported for disposal. At this time, the CTDEEP is the lead agency and is utilizing state funds for cleanup effort. The City of Shelton has indicated their intention to assume financial responsibility for all state costs by June 19. However, in the event that the City is unable to follow through, EPA may be asked to support the cleanup.

2.1.2 Response Actions to Date

EPA Actions

During his time at the incident, the OSC conducted a preliminary assessment of the building and surrounding area, the following. The following observations and actions were noted:

- The OSC evaluated the hazardous materials inventory list provided by the FD and coordinated with the FD and CTDEEP to assess possible hazards caused by the fire.
- EPA and CTDEEP coordinated on the next steps to remediate hazardous materials that remain or have migrated off site.
- Discussions were held between CTDEEP, FD and the OSC regarding the need to conduct air monitoring, and sample collection of building fall out debris and water from the fire fighting activities.
- EPA agreed that no evacuation of the nearby residents by FD was needed.
- Based on visual inspection, roofing debris near the building did not appear to contain asbestos.
- Due to structural instability of the building, EPA, FD and CTDEEP determined the above ground oil tanks, transformers and other containerized hazardous materials stored in the basement of the mill could not be located/accessed and sampled at that time.
- There were no visible impacts (oil sheen or building debris) to the river shore or river.
- The OSC departed at 10:00 on 6/14.

CTDEEP Actions:

CTDEEP has conducted and is in the process of conducting the following tasks:

- After EPA departed the scene, CTDEEP was informed by the FD that residents approximately one mile away from the mill were reporting ash and fall out debris from the mill fire on public and residential properties.
- CTDEEP and the FD investigated and collected ash and debris samples for laboratory analysis. The analysis revealed that the debris contained up to 54% chrysotile asbestos.
- Based on consultation with the OSC via phone, the Unified Command determined that CTDEEP would address the ash and debris by hiring a contractor to conduct cleanup of the asbestos debris in the impacted areas.
- In an abundance of caution, CTDEEP and the FD deployed sorbent boom at the river shore outfall (rear of mill building) to contain any release that may be attributed to fire fighting water runoff and future rain water.
- CTDEEP reported no visible distress to aquatic life and no signs of animal mortality. CTDEEP also notified CT Fisheries and Bureau of Aquaculture of the fire and remediation work.
- CTDEEP’s environmental contractor began demolition of some walls to facilitate assessing the basement areas where containers were stored. CTDEEP reported that containers are visible, intact and their material has not been released. The fuel tanks, and electrical transformers however have not been located yet. Air monitoring was conducted during the demolition activities. CTDEEP may refer this site to EPA for a possible Removal Action.

On June 18, at 9:30 am CTDEEP provided the following update:

- The fire is out, but some deep seeded hot spots still may exist under the collapsed wood floor areas.
- Continuing the collection of the asbestos debris from the neighborhoods. CTDEEP expects this task to be completed by the end of 6/18.
- The absorbent boom installed behind the mill is still in place, and the shoreline is showing no signs of a petroleum impact. The boom will stay in place and will be inspected frequently for signs of product.
- Addressing the containers in the building basement. Cleanup contractor judiciously opened/cleared areas of the building using an excavator so as to allow safe access to the containers/drum. So far, 486 containers and 68 drums have been identified. Approximately 120 containers have been removed from the building and are staged for disposal. The disposal will be conducted by US Ecology (City environmental contractor).

- Water is used as an engineering control to keep dust from becoming airborne.

- Solid particulate air monitoring for asbestos is being conducted. The data will be provided to the CT Department of Health Toxicology and Local Health for future assessment,

- CTDEEP’s will continue prioritizing the containers and open vats that contain Hexavalent-Chromium.

- The next priorities are the fuel tanks due to their proximity to the river and the electrical transformers and other remaining containers.

City of Shelton Actions:

Based on the OSC’s conversation with the Mayor of the City of Shelton and phone conversations with CTDEEP, the City is in the process of:

- Contracting with demolition contractor to secure the mill and its perimeter.

- Contacting EPA Brownfields Program to assess whether EPA funding will allow future cleanup.

- Assuming the continued cleanup of the hazardous materials from CTDEEP. Currently the City's contractor (US Ecology) is in the process of conducting hazardous characterization and disposal of the containers and drums that have been removed from the building.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The mill complex is currently owned by the City of Shelton, who took possession for unpaid taxes.

2.1.4 Progress Metrics

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2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

CTDEEP has assumed the lead role in this action, and has hired a cleanup contractor. EPA will coordinate with the EPA Brownfields Program and maintain contact with CTDEEP.

2.2.2 Issues

N/A

2.3 Logistics Section

Nothing to report at this time.

2.4 Finance Section

2.4.1 Narrative

The CTDEEP is funding cleanup efforts at this time. The City of Shelton has indicated their intention to assume financial responsibility for all state costs. However, in the event that the City is unable to follow through, EPA may be asked to support the cleanup. No federal cleanup contractor costs have been incurred to date.

2.5 Other Command Staff

No information to report at this time

3. Participating Entities

3.1 Unified Command

The City of Shelton FD, CTDEEP and EPA

3.2 Cooperating Agencies

N/A

4. Personnel On Site

No information to report at this time
5. Definition of Terms
N/A

6. Additional sources of information
   6.1 Internet location of additional information/report
   N/A

   6.2 Reporting Schedule
   Updates via POLREP will continue on a weekly basis

7. Situational Reference Materials
   N/A

   CASE PENDS