

Analysis of Brownfields Cleanup Alternatives (ABCA)

Removal Actions Former Rolfite Facility Shelton, Connecticut

July 2010

This evaluation of remedial alternatives provides the basis for alternative selection and meets the goals of an Analysis of Brownfields Cleanup Alternatives (ABCA) required for cleanups supported by EPA brownfield grants. Since there are several stages planned for the remediation of the entire Rolfite site, this analysis refers only to the upcoming removal of asbestos materials and tanks from the existing annex and boiler room buildings. The existing former floor drain vault will also be addressed. Final compliance activities will not be achieved during these planned efforts. Additional activities are likely and will likely be conducted with future redevelopment efforts.

Due to the nature of the work, limited options exist. The plan includes asbestos abatement, building demolition, tank removal, and soil excavation. The options consist of a No Action alternative and physical removal/excavation. Some variations of the removal actions exist, but there are no other means of asbestos removal, building demolition, and soil excavation.

The variations for asbestos removal can include removal prior to demolition or commingling. The costs and risks associated with commingling the debris are high and thus not recommended. It is also more sustainable to reduce the total waste by separating the asbestos from inert debris. Similarly, demolition as a standard practice leads towards deconstruction efforts that lend themselves to removal of items that can be reused and collecting separately items that cannot be reused and must be disposed.

For soil excavation, there is no real means to removing contaminated soils other than the use of heavy equipment.

Hence, the options include No Action and Physical Removal Actions

No Action

A no action alternative is generally used only for comparison. No work is completed under this item. Hence, it is the most cost effective option and the one most easily implemented.

No action is not a recommended alternative in this case because without any action, the asbestos and the tanks in the buildings will remain exposed and could further deteriorate. Further deterioration increases risk of harm and costs to mitigate. Similarly, contaminated soil at the floor drain vault presents a continuous risk. Leaving such risks also reduce the property value.

Physical removal actions

Asbestos abatement and demolition are costly activities but are effective at reducing risks at a brownfield site and are necessary prior to redevelopment activities. Subsurface contamination such as the floor drain vault serves to promulgate doubt about the property value. Removing this doubt serves to provide greater certainty for future development planning and to the property value, while also reducing environmental and human health risks.

Conducting the work in a controlled manner, such as sequencing site demolition, mitigates safety risks. Conducting work in accordance with a health and safety plan and with proper safety equipment also

