

From: Skomro, Ronald

Sent: Wednesday, March 20, 2013 12:13 PM

To: Schmidt, Paul F.

Cc: Dominick DiGangi; Martin, Douglas; Walden, Cameron; Adelsberger, Chuck; Tejada, Raul; Golos, Joanna

Subject: RE: Norwalk-Questions on CTDPH's Requirements and Procedures

Dear Mr. Schmidt:

The Department of Public Health (DPH) Asbestos Program has reviewed the pre-demolition asbestos inspection conducted by Frank Mills on November 2, 2012 of the Norwalk Pump Station and Tower Tank, 34 Grandview Avenue, Norwalk, CT. In assessing compliance with the provisions of the asbestos NESHAP, the DPH provides the following comments relative to that inspection:

The report identifies two types of windows in the pump station. One type of window was identified in Room 1 and a second type of window was identified in Room 2. Asbestos-containing window caulking was identified as a result of the survey. Please clarify whether window caulking is associated with both types of windows. If so, please confirm whether all window caulking associated with both types of windows will be treated as asbestos-containing material.

Alternatively, if separate types of caulking are present on the windows, each caulking type must be sampled to determine whether asbestos is present in the caulking.

The report indicates that "Semi-destructive techniques were utilized to collect representative samples of potential ACM." Further, the report states that "The survey and report only deals with accessible areas of the building. Additionally, there may be other non-accessible materials above ceilings, behind walls, and below floors that only become evident during demolition activities." Please detail the nature of the semi-destructive techniques that were utilized in determining the potential presence of asbestos-containing materials that may be enclosed above ceilings, behind walls, and below floors in order to satisfy the asbestos NESHAP requirement to "thoroughly inspect" the facility prior to commencement of demolition.

Please advise whether consideration was given to the presence of asbestos in gaskets that are associated with equipment and piping that may be present within the facility. Please indicate whether this equipment will be dismantled on site and disposed of as scrap metal, or whether it will be disconnected and transported to another pump station for reuse.

Please contact Joanna Golos, Environmental Sanitarian 2 of the DPH Asbestos Program at (860) 509-7367 should you wish to discuss this matter further.

Sincerely,

Ronald Skomro
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Department of Public Health
Asbestos Program
(860) 509-7367