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March 22, 2013

Mr. Raul M. Tejada
Sanitary Engineer 3
Connecticut Department of Public Health
Drinking Water Section
410 Capital Avenue - Mail Stop # 51WAT
P.O. Box 340308
Hartford, Connecticut 06134

Subject: Norwalk First Taxing District, Water Department
Spring Hill Water System Reliability Improvements Project
DWSRF No. 10300116

Dear Mr. Tejada:

The Norwalk First Taxing District, Water Department (District) and CDM Smith have received and reviewed the Connecticut Department of Public Health's (CTDPH) comments and questions regarding the pre-demolition asbestos inspection of our existing Spring Hill booster pump station. We have prepared this letter to address questions posed by Mr. Ronald Skomro in his March 20th email (attached) and provided responses to his questions below.

CTDPH Comment No. 1 - *"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."*

Response - The window caulking was only found on the exterior of the windows located in Room 2. There is no window caulking on the inside or outside of the windows located in Room 1. The windows in Room 1 are relatively new replacement windows that were installed without caulking. Only the window caulking found on the windows located in "Room 2" should be treated as asbestos containing materials (ACMs).

CTDPH Comment No. 2 - *"The report indicates that "Semi-destructive techniques were utilized to collect representative samples of potential ACM." Further, the report states that "The survey*



Mr. Raul M. Tejada
March 22, 2013

Page 2

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.”

Response – The inspection of the Norwalk Pump Station was completed as required for demolition by NESHAP. All areas above suspended ceilings were accessed to the underside of the roof. All exterior walls are brick inside and out. The exterior walls do not have cavities to hide ACMs. The floor is very thick concrete as typically found in similar pump stations. As indicated in the report, including pictures, this facility is a very simple structure. The heating system is localized and visible; therefore, there is no need to break through walls and floors to perform a thorough inspection. More specifically:

Ceilings

In “Room 1”, the drop ceiling was removed and beaver board was exposed, our engineering consultants removed a piece of beaver board using a utility knife or tweezers and exposed plywood beneath beaver board. In “Room 2”, there was a crawlspace that was accessed (see text provided in the letter report for more information).

Walls

The exterior walls are brick for the entire building.

The interior walls in “Room 1” are Beaver board and the bathroom wall was exposed and sampled. Hammer and tweezers were used to collect sample.

The interior walls of “Room 2” are painted brick.

CTDPH Comment No. 3 – *“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.”*

Response - Gaskets associated with equipment were not sampled because equipment is currently in use. In order to sample gaskets, the equipment would have to be dismantled and this pump station operates continuously to serve the Spring Hill high service area. The Contract



Mr. Raul M. Tejada
March 22, 2013

Page 3

Documents will state that demolition crew disassembling the pumps and other mechanical equipment in the building will be responsible for the proper testing and disposal of any gaskets containing asbestos waste material.

We trust that our responses will properly address CTDPH's questions. Should you have any questions or require additional information, please contact me at (401) 457-0306 or adelsbergerc@cdmsmith.com.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Charles Adelsberger", written over a blue horizontal line.

Charles Adelsberger, P.E., BCEE
Associate
CDM Smith Inc.

cc: Dominick Di Gangi, P.E. (District)
Michael Elliott, P.E. (District)
Franco Chieffalo (District)
Doug Martin, P.E. (CDM Smith)

Adelsberger, Chuck

From: Skomro, Ronald [Ron.Skomro@po.state.ct.us]
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
Supervising Environmental Analyst
Department of Public Health
Asbestos Program
(860) 509-7367