



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1 – NEW ENGLAND
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

DATE: 30 August 2010

SUBJ: Site Investigation Closure Memorandum
Walton & Lonsbury Site (MAD001197755)
Attleboro, Bristol County, Massachusetts

FROM: Elise Jakabházy, On-Scene Coordinator
Emergency Response and Removal Section I, EPRB, OSRR

THRU: David McIntyre, Chief
Emergency Response and Removal Section I, EPRB, OSRR

TO: Walton & Lonsbury Site File

In accordance with section 300.410 of the National Contingency Plan (NCP), a Removal Site Evaluation, consisting of a Preliminary Assessment and Site Investigation (PA/SI), has been undertaken at the Walton & Lonsbury Site ("Site") in Attleboro, Massachusetts. The findings of the Removal Site Evaluation have been evaluated under the criteria set forth in section 300.415 of the NCP, section 104(a) and (b) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(a) and (b) and Clean Water Act (CWA) § 311(c)(i) as amended by the Oil Pollution Act (OPA) § 4201(a). **The Removal Site Evaluation has led to the determination that a Removal Action is appropriate at this time.**

The findings of the Removal Site Evaluation are outlined below.

1. Source and nature of the release or threat of release.

- a. The Removal Site Evaluation consisted of the following actions:
 - i. The Site Investigation on 5 August – 12 August, 2010.
 - ii. Please refer to the document entitled "*Removal Program Preliminary Assessment/Site Investigation for the Walton & Lonsbury Site, Attleboro, Massachusetts, 5 August Through 12 August 2010*" by Weston Solutions, Inc., Superfund Technical Assessment and Response Team III (START).

- iii. Please refer to the document entitled *"Final Report - Indoor Air and Soil Vapor Intrusion Study Walton and Lonsbury, Inc. RCRA Corrective Action Site 78 North Ave., Attleboro, MA. March 27, 2009"* by EPA New England Regional Laboratory
- iv. Please refer to the document entitled *"Sampling and Analysis Plan (SAP) Indoor Air and Soil Vapor Intrusion Study Walton and Lonsbury, Inc. RCRA Corrective Action Site 78 North Ave., Attleboro, MA. February 12, 2009"* by EPA New England Regional Laboratory
- v. Please refer to the document entitled *"Final Report - Indoor Air and Soil Vapor Intrusion Study Walton and Lonsbury, Inc. RCRA Corrective Action Site 78 North Ave., Attleboro, MA. December 15, 2008"* by EPA New England Regional Laboratory
- vi. Please refer to the document entitled *"Sampling and Analysis Plan (SAP) Indoor Air and Soil Vapor Intrusion Study Walton and Lonsbury, Inc. RCRA Corrective Action Site 78 North Ave., Attleboro, MA. November 17 2008"* by EPA New England Regional Laboratory
- vii. Please refer to the document entitled *"Documentation of Environmental Indicator Determination, RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA725) Current Human Exposures Under Control, May19, 2006"* by Tetra Tech NUS, Inc.
- viii. Please refer to the document entitled *"Draft Site Inspection Report, Walton and Lonsbury, Inc. Attleboro, Massachusetts CERCLIS/RCRIS No. MAD001197755, July 22, 2005"* by Tetra Tech NUS, Inc.
- ix. Please refer to the document entitled *"Phase IIC – Interim Comprehensive Site Assessment Report, Walton and Lonsbury Facility, 78 North Avenue, Attleboro, Massachusetts, 7 November 2001"* by Resource Control Associates, Inc.
- x. Please refer to Public Meeting Agenda with summary of residential sampling data, *June 13, 2001*.
- xi. Please refer to Public Meeting Agenda with summary of residential sampling data, *January 4, 2001*.
- xii. Please refer to the document entitled *"Draft Modification of A Release Abatement Measure Plan for Walton and Lonsbury, Inc., 78 North Avenue, Attleboro, MA, RTN 4-23, Tier 1 Permit 82720, ACQ SE-95-9001. May 27. 1999"* by Resource Control Associates, Inc. "

- xiii. Please refer to the document entitled *"Release Abatement Measure Plan, Site ID 4-0000023, ACQ No. SE-95-0001, Permit No. 82720, June 28, 1996"* by Resource Control Associates, Inc.
 - xiv. Please refer to the document entitled *"Immediate Response Action Completion Report, Site ID 4-0000023, ACQ No. SE-95-0001, Permit No. 82720". June 21. 1996"* by Resource Control Associates, Inc.
 - xv. Please refer to the document entitled *"IRA Plan, May 7.1996"* by Resource Control Associates, Inc.
 - xvi. Please refer to the document entitled *"Phase IIA – Preliminary Comprehensive Site Assessment Report, August 10, 1990"* by Resource Control Associates, Inc.
 - xvii. Please refer to the document entitled *"Phase I - Limited Site Investigation Report, February 15, 1989"* by Resource Control Associates, Inc.
 - xviii. Please refer to the document entitled *"Surface Impoundment and Wastewater Lagoon Closure Plan for Walton & Lonsbury, February 24, 1984"* by Kemp Associates.
 - xix. Please refer to the document entitled *"Certificate of Analysis for chromium sludge samples from Walton and Lonsbury, Inc. 1984"* by R.J. Analytical Laboratories, Inc.
 - xx. Interviews with: Walhard Realty Trust; a former employee; and an abutter (who serves as d de facto caretaker of the defunct Walton & Lonsbury property).
 - xxi. Site Photographs: 1944, 1995, 2009, 2010.
- b. Based on the information available at this time, the principal hazardous substances or pollutants or contaminants that are being released or for which there is threat of release include but are not necessarily limited to the list below.

<u>Hazardous Substances or Pollutants or Contaminants</u>	<u>Media</u>
Corrosives – acids (e.g., chromic (acid, hydrochloric acid, etc.)	soil, water, containers (e.g., electroplating vats, dipping tanks, etc.)
Metals (e.g., hexavalent chromium, lead, total chromium, etc.)	soil, water, sediment, container (e.g., same as above)

Asbestos	solid (e.g., pipe wrap, insulation, etc.)
VOCs [TCE, TCA, DCE]	soil, water, sediment,
PAHs [Benzo(a)anthracene, Dibenz(a,h)anthracene, etc.]	soil

2. Evaluation of the threat to public health, welfare and the environment

a. Federal Agency for Toxic Substances and Disease Registry:

Threat _____ No Threat _____ **Evaluation Not Necessary x**

b. Endangerment to the ecosystem:

Threat _____ No Threat _____ **Evaluation Not Necessary x**

3. The Removal Site Evaluation was terminated pursuant to section 300.410(f) of the NCP for the following reason(s).

- () There is no release.
- () The source is neither a "vessel" nor a "facility" as defined in section 300.5 of the NCP.
- () The release involves neither a hazardous substance, nor a pollutant or contaminant that may present an imminent and substantial danger to public health or welfare of the United States.
- () It is subject to the limitations on response specified in §300.400(b)(1) through (3). The release is
 - () of a naturally occurring substance in its unaltered form, or altered solely through naturally occurring processes or phenomena, from a location where it is naturally found.
 - () from products that are part of the structure of, and result in exposure within, residential buildings or businesses or community structures.

() into public or private drinking water supplies due to deterioration of the system through ordinary use.

() The amount, quantity, or concentration released does not warrant a Federal response.

() A party responsible for the release, or any other person, is providing appropriate response, and on-scene monitoring by EPA is not required.

(x) The Removal Site Evaluation is complete.

4. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its completion, and not for other reasons.

a. The factors listed below, found in Section 300.415(b)(2) of the NCP, are applicable to this Site.

(X) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.

(X) Actual or potential contamination of drinking water supplies or sensitive ecosystems.¹

(X) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.

(X) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate.

(X) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.

(X) Threat of fire or explosion.

(X) The availability of other appropriate Federal or State response mechanisms to respond to the release.

(X) Other situations or factors that may pose threats to public health or welfare of the United States or the environment.

b. The existence of the conditions specified in Section 4.a., above, indicate that a Removal Action under section 300.415 of the NCP is necessary.

¹ There is an agricultural well at 51 North Avenue that was never closed. It is not in use at this time, but the historic yield is such that a homeowner could use it. As part of a proposed Removal Action, this well would be formally closed, and this potential would not be an issue.

- c. In light of the magnitude of the threat or potential threat to health, welfare, or the environment, the appropriate categorization of a Removal Action at this Site is:

Emergency____ **Time-Critical** **x** Non Time-Critical____

5. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its completion, and not for other reasons.

- a. As found in section 300.410(e)(1) of the NCP, the OSC shall determine whether a release governed by CWA section 311(c)(1), as amended by OPA section 4201(a), has occurred.

() There is a release, or potential threat of release, as governed by the CWA as amended by OPA.

(x) There is not a release, or potential threat of release, as governed by the CWA as amended by OPA.

- b. **The absence of the conditions specified in Section 5.a., above, indicate that an Oil Spill Response under Appendix E to Part 300 of the NCP is not necessary.**

cc: David McIntyre, Chief, Emergency Response and Removal Section I, OSRR
Meghan Cassidy, Chief, Technical Support & Site Assessment Section, OSRR
Jeffrey Chormann, Massachusetts DEP