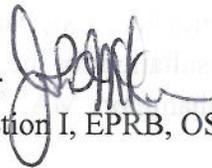




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

DATE: 22 May 2009

SUBJ: Site Investigation Closure Memorandum
Zonolite / W.R. Grace Easthampton Site
19 Wemelco Way
Easthampton, Massachusetts

FROM: John McKeown, On-Scene Coordinator 
Emergency Response and Removal Section I, EPRB, OSRR

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

TO: Zonolite / W.R. Grace Easthampton 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 Zonolite / W.R. Grace Easthampton Site ("Site") in Easthampton, 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. Review of March 10, 2000, EPA Region 1 Memorandum documenting Site Visits to Zonolite Plant Locations – N. Billerica, MA and Easthampton, MA. Former Region 1 OSC Gilberto Irizarry conducted site visit to Easthampton facility on March 8, 2000.

- ii. Review of June 12, 2000 letter (and attachments) from EPA Region 1 OSC Gilberto Irizarry to Stephen Ball of MassDEP regarding analytical data from March 17, 2000 EPA sampling event at the Zonolite / W.R. Grace facility.
 - iii. Review of the 2001 Woodward and Curran Environmental Services (W&C) Phase I Initial Site Investigation Report for the W.R. Grace Facility located on Wemelco Way, Easthampton, MA.
 - iv. Review of Massachusetts Department of Public Health (MA DPH), Center for Environmental Health, Environmental Toxicology Program, and the Agency for Toxic Substances and Disease Registry (ATSDR) 2006 Health Consultation for the Zonolite Facility located at 19 Wemelco Way in Easthampton, MA.
 - v. Multiple interviews and discussions with representatives of Mass DEP, City of Easthampton and property owners to collect up-to-date information on current site status and planned removal actions for the Site. This includes a meeting and site walk on February 10, 2009.
 - vi. EPA Region 1 START Contractor Weston Solutions, "Removal Program Preliminary Assessment Report for the Zonolite/W.R. Grace Facility Site, Easthampton, Hampshire County, Massachusetts, 10 February 2009. 2008."
 - vii. Completing PA and SI forms dated 27 April 2009.
- 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>
Asbestos Containing Materials	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 _____

b. Endangerment to the ecosystem:

Threat _____ No Threat Evaluation Not Necessary _____

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.
- 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.
 - () Actual or potential contamination of drinking water supplies or sensitive ecosystems.
 - () 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.
 - () Threat of fire or explosion.
 - (x) The availability of other appropriate Federal or State response mechanisms to respond to the release.
 - () 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.

The Zonolite/W.R. Grace Facility (Site) is a 2.5-acre property located at 19 Wemelco Way in a mixed residential and commercial area of Easthampton, Hampshire County, Massachusetts (MA). The Site consists of the former Zonolite Company (Co.) facility plant building, a large paved parking lot located along the northwestern side of the building, and a portion of an inactive rail line that runs northeast-to-southwest along the southern edge of the Site. A path from the rail bed leads to a nearby residential area. A high-pressure underground gas line bisects the Site to the northeast of the former plant building. Wemelco Way borders the Site to the west, D.O.S. Concrete Construction Company to the north, the former rail line to the south, and a hayfield to the east. An unnamed stream is located along the eastern edge of the property.

Zonolite / W.R Grace operated a vermiculite exfoliation plant at the Site from 1963 to 1992. During this time-period W.R. Grace processed approximately 183,255 tons of vermiculite ore, which originated from the W.R. Grace mine in Libby, Montana. The vermiculite ore from the Libby, Montana mine contained amphibole asbestos fibers. Following the closure of the exfoliation plant in 1992, W.R. Grace conducted asbestos abatement actions on the building. The building remained vacant until 1997. Olden Limited Partnership is the current owner of the building. J.P. Elastomers lease the building for storage of plastic goods.

EPA, MassDEP and W.R. Grace conducted soil-sampling investigations in 2000 and 2001. Analytical results from these investigations indicate the presence of amphibole asbestos materials in soil at levels above 1% on site and on the adjacent properties. The adverse health impacts resulting from inhalation exposure to amphibole asbestos is well known and documented. A 2006 MassDPH and ATSDR Health Consultation further define the potential adverse health risks at the Site. The presence of amphibole asbestos containing materials in surface soils pose an imminent and substantial endangerment to human health and EPA should take all required actions to eliminate the threat in a timely manner.

- 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 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 (w/o attachments)
Meghan Cassidy, Chief, Technical Support & Site Assessment Section, OSRR (w/o attachments)
Lisa Jones, Massachusetts DEP (with attachments)

Encl: PA/SI Report