

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Blackburn and Union Privileges - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: POLREP #2
Pollution Report #2
Blackburn and Union Privileges
01B3
Walpole, MA
Latitude: 42.1390100 Longitude: -71.2514100

To:
From: Athanasios Hatzopoulos, OSC
Date: 8/6/2009
Reporting Period: 5/29/2009 to 8/7/2009

1. Introduction

1.1 Background

Site Number:	01B3	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	
NPL Status:	NPL	Operable Unit:	
Mobilization Date:	5/28/2009	Start Date:	5/28/2009
Demob Date:		Completion Date:	
CERCLIS ID:	MAD982191363	RCRIS ID:	
ERNS No.:		State Notification:	yes
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA time critical removal action on an inactive facility

1.1.2 Site Description

The entire Site includes multiple parcels of land. This removal action will focus on the vacant-two story former mill building which exists on Lot #33-174 and the vacant lot located across the street at Lot#33-130.

The vacant two story former mill building on Lot 33-174. Various industries have operated at the Site building since the early 1800's. In approximately 1915, the Multiple Triple Woven Hose and Rubber Company, later known as Multibestos Company, began manufacturing brake linings, containing asbestos. In the mid-1930's, Multibestos closed the facility due to a class action suit brought by employees suffering from respiratory ailments. Since then, the Site had been operated by the Walpole Factories, Industrial Properties, and the Kendall Corporation. In 1985, B.I.M Investment Corporation acquired this parcel, which is believed to have remained inactive since then.

The building's foot print is approximately 32,000 square feet (ft²). The building is a two story wood/concrete/metal structure, and has a partial basement. The greater portion of the floors is made of wood. The others are concrete. There are openings on the 1st and 2nd floors which expose the floor areas directly underneath. These openings are a result of the former machinery being removed by the previous owners. The floor openings on the second floor have gotten larger through the years because the roof directly over this area is in disrepair. This allowed many years of precipitation to enter the building, damaging the floors, and rendering them structurally unsafe. Most of the windows are boarded up with wood. However, there are still some in their original glass-pane form which are missing or have broken glass panes due to vandalism activities. These openings (roof areas and windows) allow wind and precipitation to enter the building, causing friable asbestos to become airborne and migrate to the surrounding community.

Currently there is a fence around the building and some of the many entrances to the building are locked. However, there is evidence of trespass in that there is a hole in the fence and graffiti on the building. In addition, trespassers may gain access to the building through those entrances to the building that remain unlocked.

Vacant Lot # 33-130- This lot is approximately ¼ of an acre, it is unfenced, and currently used by the

abutting property owner as a tree nursery. During the November 12-13, 2008, PA/SI, automotive brake pads that were visible on the soil surface were collected and analyzed for asbestos content. The analysis revealed chrysotile asbestos up to 25%.

1.1.2.1 Site Location

The Blackburn and Union Privileges Superfund Site is located in an industrial/residential area where the Neponset River crosses South Street in Walpole, MA.

1.1.2.2 Description of Threat

On November 12 – 13, 2008, Region I Removal Program staff and contractors conducted a preliminary assessment/site investigation (PA/SI) at the Site. Within the former mill building, pipe insulation material and heating system related insulation were collected and sampled for asbestos content. In addition, liquid samples were collected from abandoned drums and other containers and were analyzed for volatile and semivolatile organic compounds (VOCs and SVOCs), metals, cyanide, polychlorinated biphenyls (PCBs), flashpoint, and pH. The bulk asbestos analysis revealed that samples contain asbestos with the highest concentration up to 70% chrysotile. Several of the drum and container samples exhibited the characteristics of hazardous wastes (i.e.: pH greater than 12 and flash point < 60°C). The liquid samples collected also revealed elevated levels, above the Massachusetts Department of Environmental Protection's (MassDEP) Standards for the following hazardous materials:

- a) Lead levels ranging to 6,870 milligrams per kilogram (mg/Kg);
- b) SVOCs - Methylnaphthalene-2 up to 1,900mg/Kg, naphthalene up to 6,500mg/Kg;
- c) VOCs - M/P Xylene to 69,000 mg/Kg, toluene 390 mg/Kg.

On the vacant lot, surface soil and automotive brake pads that were formerly land filled, were collected and analyzed. The bulk asbestos analysis revealed that the brake pads contain chrysotile asbestos up to 25%, and the surface soils contain traces of chrysotile asbestos.

The Removal Program documented its findings that a time critical removal action is warranted at the Site in its closure memorandum dated February 26, 2009.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative --Since Polrep #1, the following activities have been conducted:

Week ending June 12, 2009:

EPA, START, and ERRS personnel mobilized to the site, installed lighting, and cordoned off unsafe areas within the former mill building (FMB). ERRS began the consolidation of 126 identified containers located throughout the FMB.

Week ending June 19, 2009:

EPA, START, and ERRS personnel continued consolidation of the 126 containers located throughout the FMB. The containers were relocated to the loading dock and the shipping/receiving areas.

Week ending June 26, 2009:

EPA, START, and ERRS personnel completed consolidation of containers located throughout the FMB and cleared vegetation on Lot No. 33-174 to facilitate property access and clear areas for equipment staging. START under the direction of the OSC prepared a Request for Proposal to conduct an asbestos survey of the FMB. START identified three Massachusetts-licensed asbestos consultants willing to provide competitive quotes, and conducted a bid walk at the facility.

Week ending July 3, 2009:

START received competitive bids, and selected the qualified Massachusetts-licensed asbestos consultant with the lowest bid. Asbestos Consultants and Associates, Inc. was awarded the subcontract and the survey was scheduled to begin on 8 July 2009.

Week ending July 10, 2009:

Within the FMB ERRS personnel categorized the 126 previously consolidated containers and collected samples to develop a waste profile the containers for off site disposal at a licensed facility. The asbestos survey of the FMB was conducted in three days. The asbestos survey would include a diagram of asbestos and asbestos-containing materials (ACM) as well as volume estimates of asbestos and ACM. This survey will be given to the asbestos removal contractors bidding for the asbestos removal contract.

EPA, ERRS, and START personnel conducted a test pit investigation of the adjacent vacant lot (Lot No. 33-130) located southeast of the FMB. A total of six test pits were excavated to a depth of between 1½ and 2 feet in depth. The test pits revealed no visible deposition of asbestos or asbestos-containing materials. Photographic documentation of all the test pits was collected.

Week ending August 7, 2009:

On July 22, 2009, ERRS conducted a bid walk with asbestos removal contractors. On July 31, 2009 ERRS

chose MARCOR Environmental to collect the asbestos and asbestos containing debris and Moran Environmental transport and dispose it.

2.1.2 Response Actions to Date

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

2.1.4 Progress Metrics

<i>Wastestream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Secure the Site to prevent unauthorized access. If needed manned security may be provided during non-working hours to ensure adequate Site surveillance until the waste is transported off site;

Conduct the removal and disposal of asbestos and ACM debris from the FMB. The process shall include provisions for on-site decontamination of larger debris, and segregation of asbestos-free debris. Asbestos material will be documented, and shipped off site for disposal at EPA-approved facilities. All wastes will be staged in a secure area on-site while awaiting shipment to CERCLA compliant off-site disposal facilities;

Ship the drums and containers off-site for appropriate re-use or disposal at EPA-approved facilities;.

Conduct additional asbestos investigation of the pipe chases and/or troughs that are located on the first floor of the FMB. Because these areas are covered by heavy metal grates, or the ones that do not have the grates have metal piping that has been cut by the PRPs, they are unsafe to enter or work in. These areas were not investigated during the PA/SI or after. The plan is to open them up and conduct an investigation after the physical hazards along with the asbestos and asbestos containing debris has been removed from the floors and overhead piping. In addition, investigate the process piping, floor drains, and other systems for hazardous waste product. If any exist, then remove waste product as appropriate;

Demobilize all personnel and equipment upon completion of the removal action.

2.2.1.2 Next Steps

Air monitoring will be conducted during the asbestos removal activities.

2.2.2 Issues

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

MassDEP is providing site specific ARARs.

The Town of Foxboro is providing assistance in areas of public works, law enforcement, fire protection and other assistance as necessary.

4. Personnel On Site

1 EPA OSC
1 ERRS Contractor
2 ERRS Subcontractors
(asbestos removal and drum/container removal subcontractors)
1 START Contractor
1 START Subcontractor

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

For additional information please refer to <http://epaosc.net/BlackburnandUnionPrivileges>.

6.2 Reporting Schedule

7. Situational Reference Materials

No information available at this time.