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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: **POLREP #3**
Blackburn and Union Provileges
01B3
Walpole, MA
Latitude: 42.1390100 Longitude: -71.2514100

To:
From: Athanasios Hatzopoulos, OSC
Date: 10/5/2009
Reporting Period: 8/14/09 to 10/01/09

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 < 60ºC). 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, napthalene 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 #2, the following activities have been conducted:

Week Ending August 14, 2009

On August 10, 2009, EPA, START, and ERRS mobilized to the Site. An office trailer and generator were delivered and set up for on-site use. All personnel met to discuss the removal activities and schedule. The consolidation and over-packing of the 126 drums and containers originally planned for this day was delayed until August 21, 2009.

Week Ending August 21, 2009

On August 21, 2009, EPA, START, and ERRS mobilized to the Site to supervise the consolidation and over-packing of all 126 drums and containers. Global Remediation personnel were present on-site and performed the over-packing. The drums and containers were consolidated into a total of 19, 55-gallon steel drums, 8, 85-gallon over-pack drums, and 3, 5-gallon pails. All over-packs were staged in the building for transportation and disposal.

Week Ending August 28, 2009

On August 24, 2009, EPA, START, and ERRS mobilized to the Site to begin the asbestos/ACM removal activities. A Marcor business representative met with EPA, START, and ERRS personnel to discuss the removal schedule and scope of work. The asbestos/ACM removal process shall include provisions for on-site decontamination of larger debris, and segregation of asbestos-free debris. Asbestos/ACM 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.

START photo documented the removal areas prior to the commencement of removal activities. START will also photodocument daily removal activities during the duration of the removal action.

Over the course of this week, Marcor personnel set up negative air containment in the first floor shipping/receiving area and removed approximately 250-feet of pipe/fitting insulation and 400 square-feet of floor tiles. Once the asbestos removal activities were completed in the shipping and receiving area, Marcor personnel set up negative air containment in the second floor Dry Process/Carding room and removed approximately 300 linear-feet of pipe/fitting insulation and 2 vibration cloth dampers. The removed asbestos/ACM were placed in double-lined plastic bags, stored on polyethylene sheets, and given a site specific label until roll-off dumpsters were brought to the Site for load-out. Marcor personnel performed all removal tasks in Level C PPE and performed personal air monitoring inside of the containment areas. Once work was completed in the shipping and receiving area, a Marcor certified hygienist mobilized to the Site, visually cleared the room and ran clearance air samples. Marcor will follow the same asbestos removal activity protocol during the entire duration of the removal action.

On August 27, 2009, an ERRS T&D representative and a Clean Ventures chemist arrived on site to transport and dispose of the staged over-packed drums. Clean Ventures delivered a portion of the over-packs to Cycle Chemical, Inc. in Elizabeth, NJ and a portion of over-packs to General Chemical Corp. in Framingham, MA.

START performed air monitoring every day at six locations around the perimeter of the Site to ensure that asbestos particulates were not escaping the negative air containment areas. START will follow this protocol

during the entire duration of the removal action.

Week Ending September 4, 2009

On August 31, 2009, EPA, START, ERRS, and Marcor personnel mobilized to the Site. Marcor personnel continued removal asbestos and ACM activities in the second floor Dry Process/Carding room. Once removal activities were completed on the second floor, Marcor personnel began setting up for asbestos and ACM removal in the first floor and basement of the bleachery and the receiving cotton bail storage room. Due to the unsafe structural condition of the floors of these two areas, negative area containment was not implemented. Marcor personnel used glove bags to complete the removal work, and removed approximately 150 insulation elbow fittings.

On September 4, 2009, Marcor personnel finished removal activities in the first floor and basement of the bleachery and the cotton bail storage room and began setting up negative air containment in the Boiler Room.

START conducted photodocumention of the completed areas (shipping/receiving room, second floor Dry Process/Carding room, the first floor and basement of the Bleachery, and the Cotton Bail Storage room) once they were cleared by the hygienist. START will follow the photodocumentation protocol on all of the remaining removal action activities.

Week Ending September 11, 2009

On September 8, 2009, EPA, START, ERRS, and Marcor personnel mobilized to the Site. Marcor personnel continued to set up negative air containment in the Boiler and Chiller rooms. Once negative air containment was completed, Marcor personnel removed three boiler gaskets, 20 square-feet boiler insulation (on the south wall), 50 square-feet of transite, and 300 linear-feet of pipe and fitting insulation.

On September 9 and 10, 2009, Marcor personnel completed removal activities in the Boiler and Chiller rooms. Concurrently, Marcor personnel loaded two thirty cubic yard rolloffs with bags of asbestos/ACM. The roll-offs were double-lined with polyethylene sheets, secured, and covered with the supplied tarp in preparation for transport and disposal. All remaining roll-offs will be secured for disposal in the same manner as the first one.

On September 11, 2009, Marcor personnel began preparing negative air containment in the Process Line room.

Week Ending September 18, 2009

On September 14, 2009, EPA, START, ERRS, and Marcor personnel mobilized to the Site. Marcor personnel finished the negative air containment in the Process Line room. When negative air containment was completed, Marcor personnel removed 2,000 square-feet of transite cement board and 1,000 linear-feet of pipe and fitting insulation. On September 16, 2009, Marcor personnel loaded one thirty cubic yard rolloff with bags of asbestos/ACM.

On September 15,16 and 18, 2009, Moran Environmental picked up three roll-offs and transported them to Turn-Key Landfill in Rochester, NH for disposal.

On September 17, 2009, EPA in addressing the removal of the asbestos/ACM located in the troughs and pipe chases in the Process Line room, increased the scope of work resulting in ERRS re-bidding the additional removal work. A Site walk with potential bidders was scheduled for September 22, 2009. Because the troughs and pipe chases are in trenches covered by metal grates, the Removal Health and Safety Plan had to be amended by START to include work in confined spaces.

Week Ending September 25, 2009

On September 21, 2009, EPA, START, ERRS, and Marcor personnel mobilized to the Site. Marcor personnel completed the removal activities in the Process Line Room. Marcor Personnel loaded the staged asbestos/ACM into two roll-offs. On September 22, 2009, Marcor completed the 1st phase of the asbestos/ACM removal work and demobilized from the Site.

On September 22 and 23, 2009, Moran Environmental picked up the two roll-offs and transported them to Turn-Key Landfill in Rochester, NH for disposal.

Representatives from Marcor Environmental, Dec-Tam, TMC Environmental, Moran Environmental, Yankee Fiber, and A-D & T Enterprise, Inc. arrived on site to participate in the Site walk to bid on the remainder of the asbestos removal.

On September 23, 2009, ERRS secured and shut-down the Site until the bid was awarded for the remainder of the asbestos removal.

Week Ending October 2, 2009

On September 28, 2009, ERRS chose MARCOR Environmental to collect the asbestos and asbestos containing debris from the trenches. Moran Environmental will remain the transportation and disposal contractor.

On September 30, 2009, EPA, START, ERRS, and Marcor personnel re-mobilized to the Site and initiated the asbestos and ACM removal activities. All asbestos removal work, until the completion of the removal action, will be performed under the same protocol used during the first phase of the removal action.

2.1.2 Response Actions to Date

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

2.1.4 Progress Metrics

Wastestream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Continue securing the Site to prevent unauthorized access.

Conduct the removal and disposal of asbestos and ACM debris from the trenches and troughs. 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.

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

2.2.1.2 Next Steps

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 disposal subcontractors)
1 START Contractor

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.