

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: POLREP #4
Final
Blackburn and Union Privileges
01B3
Walpole, MA
Latitude: 42.1390100 Longitude: -71.2514100

To:
From: Athanasios Hatzopoulos, OSC
Date: 11/3/2009
Reporting Period:

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:	10/20/2009	Completion Date:	10/20/2009
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 #3, the following activities have been conducted:

Week Ending October 2, 2009

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

On September 30, 2009, EPA, START, ERRS, and Marcor personnel mobilized to the Site and began the second and final phase of the asbestos/ACM removal from the trenches and pipe chases. All on-site personnel reviewed the amended site specific health and safety plan (HASP) and scope of work, which included: 1) removing the metal grates to uncover the trenches/pipe chases in the process line room; 2) installing safety mechanisms around the opened areas; 3) removing and disposing of all asbestos/ACM from the trenches; and 4) removing all plastic containment material, and other work-related items from the building once work is completed.

Over the course of this week, Marcor personnel began working on re-establishing negative air containment, and incorporated the HASP's safety mechanisms that included placing high-visibility orange paint on the floor around grates, caution banner-guards around the grates, and extra ladders to provide additional means of egress and exit for the workers.

START performed photo documentation and air monitoring every day at six locations around the perimeter of the Site to ensure that no asbestos particulates were escaping the negative air containment.

Week Ending October 9, 2009

On October 5, 2009, EPA, START, ERRS, and Marcor personnel mobilized to the Site. Marcor personnel continued their work removing all visible asbestos/ACM from the trenches and pipe chases.

On October 9, 2009, Marcor personnel completed the removal of asbestos/ACM from the process line room trenches and pipe chases. All asbestos/ ACM removed was stored in double-lined plastic bags, given a site specific label, and stored on polyethylene sheets until roll-off dumpsters were brought to the Site for load-out.

A Marcor certified hygienist visually cleared and ran clearance samples in the process line room. Marcor personnel began removing their equipment from the building, and all plastic containment material.

Week Ending October 23, 2009

On October 12, 2009, EPA, ERRS, and Marcor personnel mobilized to the Site. Marcor personnel loaded the staged asbestos waste into three 30 yard roll-offs. The roll-offs were double-lined with polyethylene sheets, secured, and covered with tarp in preparation for transport and disposal.

On October 13, 14, and 15, 2009, Moran Environmental picked up the three roll-offs and transported them to Turn-Key Landfill in Rochester, NH.

Between October 15 to 20, 2009, Marcor and ERRS demobilized their crews and equipment from the Site.

On October 20, 2009 the Site is shut-down and secured as all tasks within the scope of work have been completed.

2.1.2 Response Actions to Date **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

2.1.4 Progress Metrics

Date	Description	Containers		Total Quantity	Disposal Method	Facility
		No.	Type			
9/15/09	RQ, Asbestos, 9, NA2212, III	1	RO	3.83 tons	Direct Subtitle D Landfill	Waste Management – Turnkey Facility 7 Rochester Neck Road Rochester, NH 03839
9/16/09	RQ, Asbestos, 9, NA2212, III	1	RO	4.58 tons	Direct Subtitle D Landfill	Waste Management – Turnkey Facility 7 Rochester Neck Road Rochester, NH 03839
9/18/09	RQ, Asbestos, 9, NA2212, III	1	RO	4.45 tons	Direct Subtitle D Landfill	Waste Management – Turnkey Facility 7 Rochester Neck Road Rochester, NH 03839
9/22/09	RQ, Asbestos, 9, NA2212, III	1	RO	2.94 tons	Direct Subtitle D Landfill	Waste Management – Turnkey Facility 7 Rochester Neck Road Rochester, NH 03839
9/23/09	RQ, Asbestos, 9, NA2212, III	1	RO	4.37 tons	Direct Subtitle D Landfill	Waste Management – Turnkey Facility 7 Rochester Neck Road Rochester, NH 03839
10/13/09	RQ, Asbestos, 9, NA2212, III	1	RO	6.76 tons	Direct Subtitle D Landfill	Waste Management – Turnkey Facility 7 Rochester Neck Road Rochester, NH 03839
10/14/09	RQ, Asbestos, 9, NA2212, III	1	RO	2.15 tons	Direct Subtitle D Landfill	Waste Management – Turnkey Facility 7 Rochester Neck Road Rochester, NH 03839
10/15/09	RQ, Asbestos, 9, NA2212, III	1	RO	.64 tons	Direct Subtitle D Landfill	Waste Management – Turnkey Facility 7 Rochester Neck Road Rochester, NH 03839

Date	Description	Containers		Total Quantity	Manifest No.	Disposal Method	Facility
		No.	Type				
8/27/09	Propane 2.1, UN1978	1	CY	20 P	58477	Recycle/Reclaim	Cycle Chemical, Inc. 217 South First Street Elizabeth, NJ 07206
8/27/09	Waste Zinc dust 4.3 (4.2), UN1436, PG II	2	DM	350 P	005871735JJK	Incineration	Cycle Chemical, Inc. 217 South First Street Elizabeth, NJ
8/27/09	RQ, Waste, Flammable	7	DM	650 P	005871735JJK	Incineration	Cycle Chemical,

	Liquids, N.O.S. (Xylene, Toluene) 3 UN 1993, PG II (D001)						Inc. 217 South First Street Elizabeth, NJ 07206
8/27/09	RQ, Waste, Flammable Liquids, N.O.S. (Xylene, Toluene) 3 UN 1993, PG II (D001)	1	DF	55 G	005871735JJK	Incineration	Cycle Chemical, Inc. 217 South First Street Elizabeth, NJ 07206
8/27/09	RQ, Waste, Flammable Liquids, N.O.S. (Xylene, Toluene) 3 UN 1993, PG II (D001)	1	DF	15 P	005871735JJK	Incineration	Cycle Chemical, Inc. 217 South First Street Elizabeth, NJ 07206
8/27/09	Waste, Aerosols 2.1, UN 1950	1	DF	2 P	005871736JJK	Incineration	Cycle Chemical, Inc. 217 South First Street Elizabeth, NJ 07206
8/27/09	RQ, Waste Caustic alkali liquids, N.O.S. (Sodium Hydroxide, Potassium Hydroxide) 8, UN 1719, PG II (D002)	3	DM	900 P	005871737JJK	Stabilization	General Chemical Corp. 133 Leland Street Framingham, MA 01701
8/27/09	Off- Specification Used Oil Fuel	1	DM	200 P	005871737JJK	Fuel Blending/Recycle	General Chemical Corp. 133 Leland Street Framingham, MA 01701
8/27/09	State Regulated Oily Material	2	DM	400 P	005871737JJK	Solidification/Landfill	General Chemical Corp. 133 Leland Street Framingham, MA 01701
8/27/09	State Regulated Oily Material	1	DM	200 P	005871737JJK	Solidification/Landfill	General Chemical Corp. 133 Leland Street Framingham, MA 01701

2.2 Planning Section

2.2.1 Anticipated Activities

None

2.2.1.1 Planned Response Activities

None

2.2.1.2 Next Steps

None

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

No information available at this time.

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.