

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Parsons Paper Mill - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: POLREP #2
Progress Report
Parsons Paper Mill
01FZ
Holyoke, MA
Latitude: 42.1984490 Longitude: -72.6110460

To:
From: Athanasios Hatzopoulos, OSC
Date: 12/16/2009
Reporting Period: 11/2/09 to 12/11/09

1. Introduction

1.1 Background

| | | | |
|----------------------------|--------------|--------------------------------|----------------|
| Site Number: | 01FZ | Contract Number: | |
| D.O. Number: | | Action Memo Date: | 9/24/2009 |
| Response Authority: | CERCLA | Response Type: | Time-Critical |
| Response Lead: | PRP | Incident Category: | Removal Action |
| NPL Status: | Non NPL | Operable Unit: | |
| Mobilization Date: | 10/28/2009 | Start Date: | 10/28/2009 |
| Demob Date: | | Completion Date: | |
| CERCLIS ID: | MAD001114362 | RCRIS ID: | |
| ERNS No.: | | State Notification: | yes |
| FPN#: | | Reimbursable Account #: | |

1.1.1 Incident Category

Time Critical

1.1.2 Site Description

The Site is comprised of approximately 4.61 acres and is located near the center of Downtown Holyoke in a mixed industrial/commercial/residential area. It is currently zoned for "General Industry" uses although residences are located within 500 feet of the property. The Parsons Paper Company had conducted paper making operations at the Site since approximately 1890. It ceased operations in 2005 and has been inactive since then.

On June 9, 2008, a fire destroyed approximately 50% of the mill which is made up of five interconnected buildings. The mill buildings ranged from two to four stories in height that once occupied approximately 330, 642 square feet. The fire burned down two sections of the mill. The largest burned section is the portion situated along the northwestern property line, adjacent to the First Level Canal and adjacent to Sargeant Street. The other burned building is situated adjacent to the southwest and to the south east of the aforementioned building. The remaining portions of the interconnected building complex have been damaged by the fire and are situated in a perpendicular direction (northwest to southeast) relative to the canal system. There are multi-segmented basements and sub-basements throughout the burned and un-burned mill buildings. Apart from the building structures, the Site grounds are generally covered by asphalt pavement or packed gravel for parking uses. The Site is secured by a chain link fence.

According to information provided by the MassDEP, the rubble from the burned and collapsed portion of the mill, estimated to be a volume of approximately 5,000 cubic yards, currently exists in piles at the northern portion of the property, filling portions of the building foundation. This burned rubble contains primarily brick rubble, with some amounts of other solid wastes, including wood and metal. The rubble from the fire is an asbestos-containing waste material according to the MassDEP regulations at 310 CMR 7.00, based on positive asbestos tests of the rubble (demolition debris) and other materials within the mill, which were commingled with the brick rubble during the fire. Sources of asbestos include asphalt shingles, window glazing/caulking, tank and pipe insulation, transite siding, cements/mastics, and floor tiles.

Within a one mile radius of the Site are 32 schools which include daycare centers to public/private schools. The closest day care center is less than .1 mile away, and Holyoke High .8 miles away. The population within one mile radius is 21,876. According to the EPA Region 1 Environmental Justice Mapping Tool, the Site is in an environmental justice area.

1.1.2.1 Location

The Parsons Paper Mill Site is located at 84 Sargeant Street, Holyoke, MA. The latitude and longitude of the approximate center are 42E 11' 53"north and 72E 36' 42"east. The Site is more fully described as parcel 005 on Assessor's Map 018, Block 01. It is bordered by Sargeant Street to the northeast, a commercial property and Jackson Street to the southwest, and the City of Holyoke canal system's First and Second Level Canals to the northwest and the southeast respectively.

1.1.2.2 Description of Threat

The contaminant of concern is friable asbestos. Airborne friable asbestos is a health threat to anyone walking on, traveling by or living near the Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Sampling efforts by the EPA PA/SI, MassDEP and Tighe & Bond documented the presence of asbestos up to 70 %.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

11/2/09 to 11/13/09

Environmental Restoration, LLC. Emergency Rapid Response Services (ERRS) began identifying potential staffing, site security needs, safety work tasks, structural engineering support needs, vendors and obtaining cost proposals for equipment and other support services. The ERRS T&D Coordinator began review of analytical data to identify waste streams and vendors for procurement purposes.

11/16/09 to 11/27/09

On November 16, 2009, EPA OSC Hatzopoulos, ERRS, and Weston Solutions, Inc. Superfund Technical Assessment and Response Team III (START) contractor mobilized to the Site to begin the removal activities.

Equipment items delivered were an office, crew and decon trailers, two light towers, two generators, three porta-johns, long reach excavator, 60' manlift. ERRS personnel cleared brush and debris outside the buildings to access work areas and began setting up and stabilizing inside building # 1 for asbestos work removal operations. 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.

ERRS also installed additional high visibility fencing to delineate further hot zones areas and removed loose brick and slate tiles from edge of perimeter along western edge of roof on double-gabled building.

A structural engineer performed exterior and interior inspection and assessment of the buildings. Manned Site security began on November 16, 2009 and will continue to be on Site during the non-working hours throughout the duration of the removal action.

On November 17, 2009, OSC Hatzopoulos and the ERRS RM met with representatives from the City of Holyoke's departments of public works, law, fire, building, gas and electric, and the conservation commission, to discuss the removal activities.

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. START also performed air monitoring, every day at five locations around the perimeter of the Site, to ensure that asbestos particulates were not escaping into the environment as a result of the removal activities. START will follow this protocol during the entire duration of the removal action.

Under the direction of the OSC, START personnel collected 54 debris samples from the standing buildings and foundation areas of the razed buildings. They were delivered to the EPA Office of Environmental Measurement and Evaluation (OEME) for asbestos analysis via Polarized Light Microscopy (PLM).

On November 23, 2009, EPA OSC Hatzopoulos, and EPA Public Affairs personnel met with MassDEP and representatives from the City of Holyoke's departments of public works, law, fire, building, gas and electric, and the conservation commission, to discuss removal activities.

On November 25, 2009, all personnel demobilized for the Thanksgiving holiday.

11/30/09 to 12/11/09

ERRS continued securing and stabilizing areas at interior and exterior of the buildings. ERRS began asbestos removal activities in Building 1. A temporary ramp was built at the north end of Building No. 1, so that there is direct access to the second floor. All loose ACM and debris was collected off the 2nd floor of Building No. 1 and double bagged. Asbestos removal continued on the 2nd floor of Building No. 1. The entire eastern wall of pipe installation was removed. Personnel air monitoring continued for asbestos analysis as well as perimeter monitoring. Between Buildings No. 2 and 3, work began to prep a staging area for large debris that needs to be removed to gain access to the asbestos.

Personnel air monitoring was conducted for lead and asbestos analysis. Perimeter asbestos air sampling was conducted during asbestos abatement activities.

Under the direction of the OSC, START personnel collected two additional ACM samples from insulation around an oven located on the second floor inside Building No. 3 and were delivered to OEME for asbestos PLM analysis.

On December 1, 2009, EPA OSC Hatzopoulos, EPA Branch Chief Art Johnson, and EPA Public Affairs personnel met with the City of Holyoke's current and incoming Mayors including representatives from the departments of public works, law, fire, building, gas and electric, and the conservation commission, to discuss removal activities.

On December 8, 2009, EPA Health and Safety Officer mobilized to the Site to conduct a site health and safety inspection. A temporary construction fence was built on the eastern side of Building No. 4 per the Health and Safety Officer's request.

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

2.1.4 Progress Metrics

| <i>Waste Stream</i> | <i>Medium</i> | <i>Quantity</i> | <i>Manifest #</i> | <i>Treatment</i> | <i>Disposal</i> |
|----------------------------|----------------------|------------------------|--------------------------|-------------------------|------------------------|
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2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Stabilize the areas that are structurally unsafe to enable contractor personnel to conduct the removal action. If the need arises, dismantle the unstable sections to permit access to asbestos, and ACM commingled debris.

Conduct the removal and disposal of asbestos and ACM debris. The process shall include provisions for on site decontamination of larger debris, and segregation of asbestos-free debris. Asbestos material and asbestos contaminated waste 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.

Conduct multi-media sampling as needed to support the above activities.

Conduct additional investigation on any found drums and other containers remaining at the Site. If drums/containers are found to contain hazardous substances, they will be repackaged, categorized, staged, manifested, and shipped off-site for disposal at EPA-approved facilities. If they contain oil product they will be referred to the MassDEP.

After the asbestos containing debris is removed, conduct grade and backfill activities as needed to secure the open excavated areas of the Site. (Completion of this task may be contingent upon approval of the MassDEP and the City of Holyoke to allow EPA to use the clean brick rubble as fill, or other backfill being provided by the City or another stakeholder of the project.)

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

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.