

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region I

**Subject:** POLREP #3  
Progress report  
Parsons Paper Mill  
01FZ  
Holyoke, MA  
Latitude: 42.1984490 Longitude: -72.6110460

**To:**  
**From:** Athanasios Hatzopoulos, OSC  
**Date:** 2/18/2010  
**Reporting Period:** 12/14/09 to 2/19/10

1. Introduction

1.1 Background

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

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 unburned 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 (see sitrep # 2 for previous actions)**

##### **12/14/09 to 12/31/09**

ERRS continued and completed the removal of visible friable asbestos and ACM in Building 1. The areas where friable asbestos existed, and consequently removed, were HEPA vacuumed. The removed asbestos was double bagged and placed in double polyethylene lined 30 cy roll-offs for disposal. In addition, asbestos containing transite (pipes and boards) were discovered on the Site grounds and were placed in the 30 cy roll-offs for disposal.

ERRS completed the asbestos and ACM removal from the boiler room that is located between Buildings No. 2 and 3. During the removal activities, friable asbestos and ACM, as well as non-asbestos containing debris (wood, metal, and brick) were segregated and stockpiled in pre-designated areas. Seven dump trailers were double lined then loaded with approximately 184 tons of asbestos containing material. The asbestos and ACM debris was misted as it was loaded to prevent any possible asbestos from migrating off Site. It was then transported to the Ontario County Landfill in Stanley, NY.

The only visible ACM remaining in Building 1 are transite boards which will be removed by ERRS at a later time during this removal action. In addition, during the asbestos removal activities, four one gallon containers with Formic Acid and six 50-pound bags with formaldehyde were discovered in Building 1. These wastes have been secured and they will be consolidated with other non-asbestos hazardous wastes that currently exist in other building areas. These will be disposed at a later date.

EPA received the asbestos analysis on the 54 debris samples collected on November 2009. The results indicate that several areas are contaminated with asbestos that range from 2% to 50%.

Perimeter asbestos air sampling was conducted by START during asbestos removal activities.

On December 17, 2009, EPA held a public meeting with the City of Holyoke to discuss and update the City, local community, MassDEP, and the media, of the EPA's removal activities.

##### **1/4/10 to 1/29/10**

ERRS began and continued the removal of visible friable asbestos and ACM in Building 2. All areas where asbestos and ACM existed and consequently removed were HEPA vacuumed. The removed asbestos was double bagged and placed in double polyethylene lined 30 cy roll-offs for disposal. On January 25, 2010, two 30 cy roll off containers were transported to the Ontario County Landfill in Stanley, NY.

ERRS also began the removal and segregation of the non-asbestos containing debris (wood, metal, and brick) from the burned and razed footprint areas. The brick was left in place, and the wood and metal debris were stockpiled in pre-designated areas.

Personnel air monitoring was conducted for lead and asbestos analysis since work started in a different building. Perimeter asbestos air sampling was conducted by START during asbestos removal activities.

On January 27, 2010, a debris sample was collected from a furnace duct that is adjacent to Building No. 5 for SVOCs and metals analysis by NERL.

##### **2/01/10 to 2/19/10**

ERRS continued and completed the removal of visible friable asbestos and ACM in Building 2, and began removal activities in Building #3. ERRS conducted an investigation of the drums that existed in Building No. 2. Eight drums are suspect to contain hazardous materials and will require additional hazardous categorization.

On February 2, 2010, two demolition companies arrived on Site to discuss the planned demolition work of the structurally unsafe fire damaged building sections, so they could prepare a bid proposal.

Also, upon review of the analytical results of the 54 samples collected in November 2009, the OSC directed ERRS to begin consolidation of the ACM debris at areas (the burned building footprint) that are easily accessible for truck entry and load out purposes. From 2/16 to 2/18/10, 11 dump trailers were double lined then loaded with approximately 275 tons of ACM debris. They were transported to the Ontario County

Landfill in Stanley, NY.

Perimeter asbestos air sampling was conducted by START during asbestos removal activities.

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

#### 2.1.4 Progress Metrics

<i><b>Waste Stream</b></i>	<i><b>Medium</b></i>	<i><b>Quantity</b></i>	<i><b>Manifest #</b></i>	<i><b>Treatment</b></i>	<i><b>Disposal</b></i>

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

#### 2.2.1.1 Planned Response Activities

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**

- 1 EPA On Scene Coordinator
- 1 START
- 1 ERRS RM
- 1 ERRS equipment operator
- 1 ERRS foreman as needed
- 3 ERRS cleanup techs
- 1 H&S tech
- 1 TD coordinator as needed

**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.