UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: **POLREP #4**
Final
Parsons Paper Mill
01FZ
Holyoke, MA
Latitude: 42.1984490 Longitude: -72.6110460

To:
From: Athanasios Hatzopoulos, OSC
Date: 5/11/2010
Reporting Period: 2/22/2010 to 5/3/2010

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:	4/26/2010	**Completion Date:**	4/26/2010
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 (see sitrep # 3 for previous actions)

2/22/10 to 2/26/10

ERRS continued removing the ACM debris from the burned building footprint areas (Buildings No. 4 and 5). From 2/16/10 to 2/26/10 a total of 20 trailer loads (totaling 511.62 tons) were transported to the Ontario County Landfill in Stanley, NY. The ERRS T& D Coordinator was on Site and performed hazardous categorization on waste materials (acids, caustics, flammables, solids, etc) found in containers throughout the buildings. During the investigation of these containers, eight 55 gallon fiber drums filled with asbestos containing pipe insulation were discovered in the basement of Building No. 3.

Personnel air monitoring was conducted for asbestos analysis. Perimeter asbestos air sampling was conducted by START during asbestos removal activities.

3/1/10 to 3/12/10

ERRS completed the asbestos removal activities from Building No. 1. The asbestos transite panels from the first and second floors of Building No. 1 were removed and placed in a double-lined roll-off container for disposal.

Demolition of the fire damaged and/or structurally unsafe portions of the buildings began and was completed during this timeframe. Holyoke Police was hired to control traffic on Sargeant Street. During the demolition work, dust control was accomplished by continuously spraying the work areas with water from the canal. Buildings No. 3, 4, and 5 were all subjected to some of the demolition work. Both elevator shafts of Building No. 4 were razed down to the basement level. The second floor exterior walls as well as the roof were removed from Building No. 3. The interior wall structure remained due to its connection with the asbestos covered oven. The southern side of Building No. 5 that consisted of a pattern of archways was removed to the bottom of the window sills. Steel and timbers were segregated from the newly created demolition debris.

Personnel air monitoring was conducted for asbestos analysis. Perimeter asbestos air sampling was conducted by START during asbestos removal activities.

3/15/10 to 3/26/10

ERRS performed asbestos removal work in Building No. 3. Any asbestos that remained in the basement prior to the demolition was removed. Also all remaining asbestos pipe installation on the first floor was removed and bagged for disposal. ERRS began the asbestos removal on the dryer unit on the second floor.

All containers on site with various contents, including but not limited to: mercury, acids, and caustics, were collected in one area. Work began to consolidate and overpack them for disposal.

On 3/23/10, EPA met with the City of Holyoke's department directors and representatives from the MassDEP. EPA discussed the close out of the Parsons Paper Mill Removal Project, and the safety issues that would concern the City and MassDEP after EPA completes its work. During the meeting Mitch Moskal informed EPA that two radiation sources existed in two machines at the Site.

ERRS began constructing wood covers for the ceramic basins on the north end of Building No. 3.

Personnel air monitoring was conducted for asbestos analysis. Perimeter asbestos air sampling was conducted by START during asbestos removal activities.

3/29/10 to 4/9/10

ERRS completed the asbestos removal on the dryer unit located on the second floor of Building No. 3. In addition they removed approximately 130 gallons of oil from a reservoir tank on the first floor of Building No. 1. ERRS also mixed additional oil from non-polychlorinated byphenyl oil (PCB) oil pumped from transformers found throughout the Site.

Mitch Moskal arrived at the Site and located the machines with the radiation sources. On 3/31/10, EPA Radiation Program Manager, Anthony Honnellio arrived on Site to lead the radiation source removal. In addition, MassDEP representatives Dave Slowick and Larry Hanson were on Site to view the radiation source removal and to receive a final Site walk-through from OSC Hatzopoulos. After the sources were removed, EPA screened the surrounding area and confirmed that no residual radiation remained. The sources were submersed in lead shot in a 5-gallon bucket. The 5 gallon bucket was then placed in a 55-gallon steel drum packed with bricks. The steel drum was locked in the CONEX box on Site temporarily until the recycling center shipped the appropriate container for transport.

ERRS completed the construction of the wooden covers and placed them over the ceramic vats at the rear of Building No.3. Bricks were also placed on top of covers to prevent anyone moving them. The stainless steel lined vat was also covered with a steel plate and large blocks of sandstone were placed on top. The two ceramic vats found in Building # 1, were covered with layers of high visibility fence to prevent physical injury as well.

Personnel air monitoring was conducted for asbestos analysis. Perimeter asbestos air sampling was conducted by START during asbestos removal activities.

4/12/10 to 4/28/10

ERRS began demobilization activities. ERRS and the OSC conducted a final check list and found some additional asbestos transite pieces on the second floor of Building No. 2. These pieces were picked up and placed in rolloff for disposal. ERRS also placed the waste from a pipe stack in the ACM waste stream rolloff for disposal. The 30 yd rolloff was picked up on 4/15/10 and was transported to the Ontario County Landfill in Stanley, NY. On 4/16/10, the radiation sources were shipped to Qual-X in Powell, OH, for recycling.

ERRS closed and secured with plywood, all of the access ways to the building that were opened during the removal activities were. In addition, ERRS installed high visibility fence around the excavation area behind Building No. 2, and also installed two chain link fences. The first section was in front of the first penstock behind the buildings, and the other one was from the front gate to the side of Building # 3. This section of fence also had two 10-foot swing gates attached for access by trucks or machines into the Site along the burned out sections

On 4/21/10, nineteen 55 gallon drums were consolidated and were disposed to Complete Recycling Solutions, FallRiver, MA, ENPRO Services of Vermont, Williston, VT, and Vexor Technology Inc., Medina, OH. The contained elemental mercury, formic acid, waste oil and non-PCB transformer waste oil, sodium aluminate, and sulphuric acid.

On 4/26/10 ERRS completely demobilized from the Site.

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

2.1.4 Progress Metrics

See documents for the the waste stream disposal (Drum Disposal.PDF)

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

None

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$1,300,000.00	$850,000.00	$450,000.00	34.62%

TAT/START	$200,000.00	$190,000.00	$10,000.00	5.00%
Intramural Costs				
USEPA - Direct	$75,000.00	$50,000.00	$25,000.00	33.33%
Total Site Costs	$1,575,000.00	$1,090,000.00	$485,000.00	30.79%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

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.

POLREP #4 Last Updated 5/12/2010