

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Former Tombarello & Sons Property Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region I

**Subject:** POLREP #3  
Progress  
Former Tombarello & Sons Property Site  
01FQ  
Lawrence, MA  
Latitude: 42.7174990 Longitude: -71.1410129

**To:**  
**From:** Michael Barry, OSC  
**Date:** 12/9/2010  
**Reporting Period:** 10/14/2010-12/9/2010

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	01FQ	<b>Contract Number:</b>	EP-W-08-062
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	7/7/2010
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	N/A
<b>Mobilization Date:</b>	9/14/2010	<b>Start Date:</b>	9/14/2010
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	MAD019426238	<b>RCRIS ID:</b>	MAD019426238
<b>ERNS No.:</b>	N/A	<b>State Notification:</b>	3-18126
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

The "Site" consists of nine privately-owned residential properties (total of approximately 2 acres) and an abandoned former metal scrap recycling facility (14 acres) known as Tombarello and Sons. Operations had included magnetic separation of metals from soil and truck driving instruction, both of which generated dust for many years. The residential properties have reportedly been contaminated due to their proximity to the facility. They are all currently occupied, and their condition and features are consistent with well-maintained homes.

Tombarello had erected a fence between the homes and the facility in the mid-1960s, and later maintained it to help mitigate fugitive dust from entering the residential properties.

On April 2, 2008 the Site was referred by letter to EPA from the Massachusetts Department of Environmental Protection (MassDEP), who had already sampled the nine residential properties and the facility, as a potential removal action. On April 29, 2008, EPA performed a Preliminary Assessment/Site Investigation (PA/SI) on the residential properties.[1]

[\[1\] The facility was not inspected at that time because of access issues.](#)

#### 1.1.2 Site Description

The Tombarello property is generally level, contains several buildings and building foundation pads, and is secured with chain-link fencing. Most of the equipment, metal and debris have been removed, but some, including one excavator, remains. The surface is a mostly bare soil/gravel mix with some sparse vegetation and some soil piles. A drainage ditch runs from the north to the southwest, adjacent to I-495. Sampling on the northern property boundary indicates contamination with PCBs and metals in surface soil (see Table 1 on page 3).

The residential properties are well-maintained and contain homes, lawn, decorative shrubbery/ trees and a variety of outbuildings and patios. Elevated levels of polychlorinated biphenyls (PCBs) and metals have been detected throughout the back yards (see Table 2 on page 4).

A narrow strip of land in the back of some of the residential properties is legally part of the Tombarello & Sons property, but had been incorporated as an integral part of the resident's back yards for years because the fence was placed inside the Tombarello & Sons property and a vegetative border evolved.

According to the Region ArcGIS mapping tool, within one mile of the Site there are:

- 21,968 residents;
- 8 public and private schools;
- One day care center;
- One hospital;
- Two nursing homes.

According to the EPA Region 1 Environmental Justice Mapping Tool, the Site is not in an environmental justice area.

**1.1.2.1 Location**

The impacted residential properties are located at 19-53 Hoffman Avenue in Lawrence, Essex County, Massachusetts (Map 33, Lots 14, 13, 12, 12a, 11, 10-1, 10-2, 9 and 8), north of the Tombarello property the address of which is 207 Marston Street (Map 33, Lot 17); (42 43' 10.88 North latitude, 071 08' 29.41 West longitude). This mixed industrial/ residential area is bounded on the east by I-495, on the west by Marston Street, on the north by the Hoffman Avenue, and on the south by industrial properties. A middle school is located across Marston Street from the Tombarello property.

**1.1.2.2 Description of Threat**

Analysis of 17 soil samples from the northern property line of the Tombarello & Sons property detected PCBs, lead, cadmium, chromium and barium in excess of MassDEP and/or EPA screening levels for unrestricted residential use.

Analysis of 129 soil samples from the residential properties detected PCBs, lead, cadmium, chromium and arsenic in excess of MassDEP and/or EPA screening levels for unrestricted residential use.

The PA indicated that the pathway of the contaminants to the abutting yards was both by air via wind and dust and by surface water run-off. SI sampling supports these pathways by indicating that the contamination is on or near the ground surface. In the following table summarizing the data, highlighted entries indicate exceedences of allowable contaminant levels and associated properties.

**1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

<i>Table 1: Tombarello Site Northern Property Line Contaminant Concentrations in mg/kg (ppm)</i>				
	PCB (Ar-1260)	Lead	Cadmium	Chromium
MAX	6.33	1730.00	17.00	57.70
AVE	2.51	391.16	4.14	33.00
MassDEP S-1	2	300	2	30
ATSDR	1			
Imminent Hazard (MADEP)	10		60	

<i>Table 2: Tombarello Site Residential Contaminant Concentrations in mg/kg (ppm)</i>					
Residence	PCB	Lead	Cadmium	Chromium	Arsenic
19 Hoffman	0.68	171.60		14.80	31.20

21 Hoffman	1.47	141.60		24.60	
25 Hoffman	1.01	300.00	1.80		
27/29 Hoffman	0.36	88.50		24.50	13.50
31 Hoffman	1.44	158.50		26.50	
33 Hoffman	0.30	114.80			
41 Hoffman	1.70	595.50	5.20	30.75	
51 Hoffman	2.82	273.50	1.90	25.90	
53 Hoffman	1.26	153.30	2.80	30.50	
MassDEP S-1	2.00	300.00	2.00	30.00	20.00
ATSDR	1.00				

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

ERRS completed phase 1 of activities and demobilized from site on 10/5/2010.

#### 2.1.2 Response Actions to Date

- Grubbing vegetation to support property line survey and additional START soil sampling
- Collect, segregating, staging and removing hazardous waste containers and items from the site open areas and buildings that cannot be secured
- From 8/25/2010 to 9/3/2010 START performed additional sampling on the residential properties; a total of approximately 330 samples were taken from 150 sample locations for metals, PCB's and PAH's. One residence was sampled for Hexavalent Chromium.
- From 10/12/2010 to 10/21/2010 START performed Site Investigation (SI) sampling on the Tombarello & Sons property; a total of approximately 200 samples were taken from 154 locations for metals, PCB's and PAH's.

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

A Notice Letter was sent to the agent for the Note holder on 8/26/2010. A Notice Letter was also sent to the Note Holder's last known site contact. Research as to contact information for the source PRP continues.

The PRP has hired an attorney and Licensed Site Professional (LSP). The PRP has requested EPA's data, for the Tombarello Property, to review and decide if they can perform the removal. EPA granted the PRP 30 days to review the data upon receiving it, and determine their involvement with the removal.

#### 2.1.4 Progress Metrics

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

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

- Communicate sampling analysis results to residents, commence planning for removal action in Spring 2011.
- Perform a removal of higher concentrated contaminated soil that presents a recontamination hazard and staged hazardous materials and containers in Fall/Winter 2010-2011.
- Perform residential removal per sampling results after the removal action on the Tombarello property.

#### 2.2.1.1 Planned Response Activities

See above.

#### 2.2.1.2 Next Steps

- Evaluate Tombarello & Sons property data when available.
- Evaluate residential data and communicate results to residents.
- Continue dialogue with PRP about them performing removal activities.

### 2.2.2 Issues

- Residents are concerned about impacts to their health due to soil contamination and impacts during the removal project.

### **2.3 Logistics Section**

START resource scheduling with ongoing Parker Street Site.

### **2.4 Finance Section**

No information available at this time.

### **2.5 Other Command Staff**

#### **2.5.1 Safety Officer**

Nothing to report at this time.

#### **2.6 Liaison Officer**

Significant liaison with MassDEP, MADPH and ATSDR. To undertake with City of Lawrence Inspectional Services/Conservation Officer.

#### **2.7 Information Officer**

##### **2.7.1 Public Information Officer**

Community Response Plan under development.

##### **2.7.2 Community Involvement Coordinator**

Community Involvement activities have been extensive with significant outreach to individual residents. ATSDR and Community Involvement Staff held a Health and Risk informational consult meeting with residents on 8/27/2010.

## **3. Participating Entities**

### **3.1 Unified Command**

This site is utilizing a single agency Incident Command with EPA as the Incident Commander. OSCs Barry and Vanderboom are jointly managing this site. EPA START and ERRS (Guardian Environmental Services) are providing site execution.

### **3.2 Cooperating Agencies**

- MassDEP
- MADPH
- City of Lawrence
- Residents
- EPA Community Involvement Staff and ATSDR are providing critical site support.

## **4. Personnel On Site**

EPA: 1 to 2 OSC, 1 to 2 CIC/ATSDR as required  
ERRS: 3 to 6  
START: 1 to 4

## **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.