U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Walton & Lonsbury Site - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: **POLREP #3**
Walton & Lonsbury Site
01GM
Attleboro, MA
Latitude: 41.9577030 Longitude: -71.2970960

To:
From: Elise Jakabhazy, On-Scene Coordinator
Elsbeth Hearn, On-Scene Coordinator
Date: 9/29/2011
Reporting Period: 3/1/2011 - 9/7/2011

1. Introduction

1.1 Background

Site Number:	01GM	**Contract Number:**	EP-W-08-062 Task Order 20
D.O. Number:		**Action Memo Date:**	9/2/2010
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	10/19/2010	**Start Date:**	10/19/2010
Demob Date:		**Completion Date:**	
CERCLIS ID:	MAD001197755	**RCRIS ID:**	
ERNS No.:		**State Notification:**	3/11/09
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

CERCLA Incident Category: Inactive Production Facility - Chromium plating facility

1.1.2 Site Description

See Polrep 1.

1.1.2.1 Location

See Polrep 1

1.1.2.2 Description of Threat

See Polrep 1.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See Polrep 1.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The U.S. Environmental Protection Agency (EPA) and their contractors mobilized to 78 North Avenue, Attleboro, Massachusetts in October 2010 to prepare the Site for the removal of hazardous materials. EPA's contractors include:

- the Emergency & Rapid Response Services (ERRS) contactors - Guardian Environmental Services (GES), and their subcontractors from Shaw Group; and
- the Superfund Technical Assessment and Response Team (START) contractors - Weston Solutions.

Refer to Polrep 1 for initial Site preparation and set-up activities.

ERRS Activities since the last Polrep included: the set up and daily operation of an onsite water treatment

system and pumps for excavation water; excavation of wetlands on the southern side of the Site in 1-foot lifts; staging of excavated contaminated soils for subsequent transportation and disposal (T&D); coordination of the T&D of remaining hazardous drums and items from the building; and excavation and appropriate T&D of approximately 300 tons of contaminated soil from beneath the former large chromium plating room; conduct exploritory excavation so uncover the locations of a production well and possible discharge pipes for the former plating facility; clear cut all vegetation located in the wetlands directly behind 32 Walton street (southwest of the excavation); prepare residential area for removal activities; conduct a pre-removal video and photographic documentation of all properties on which ERRS activities will be conducted; complete access road and staging area construction behind 65 North ave in preparation for the upcoming residential removal activities; finish tree and brush removal in residential area; transfer the water treatment system from western division to eastern division (residential removal area) and begin treating water; transfer and dispose of soil piles 1, 3, and 4 from excavated wetlands; conduct exploratory drilling exploration sessions for upcoming ISRM treatability studies; construct an earthen berm around contaminated wetlands to control stormwater runoff; perform exploratory excavation in the area of the Paulette Lane storm drain to determine where the stormwater is routed; facilitate exploratory geotechnical drilling operations for the in-situ treatment of groundwater and characterization of wetland soils; construct continuation of berm along Bliss Brook; complete construction of staging area in residential area; prepare Site for Hurricane Irene (August 28, 2011) to prevent damages; construct sump pumps in excavation area to begin dewatering process; construct Bliss Brook pipe bypass system.

START activities during demolition of the building included: deploying perimeter particulate monitors at 7 locations on- and off-Site; deploying 4 off-Site perimeter air monitoring pumps that were sent to a laboratory and analyzed for hexavalent chromium, total chromium and lead until 3/18/2011 when this air sampling was discontinued due to the previous results indicating none of these contaminants were detected in the air; conducting Site visits and conference calls with engineers for the design of the residential removal activities planned for the summer and fall of 2011; using the X-Ray Florescence unit to analyze the soil at each one-foot lift of wetland soil excavated to determine the need for additional excavation at that location and as necessary during removal activities; collection and analysis of additional surface and subsurface samples at residential properties to determine extent of contamination; collection and analysis of samples in the wetlands southwest of the excavation and north of Deanville Road to determine extent of contamination; implementing the new VIPER telemetry sofware to increase the site health and safety; when removal activities began on residential (Eastern Division) of Site, deploying perimeter particulate monitors at 6 locations around the residential work area; conduct PASI # 5 in the wetlands and residential properties south of the demolished facility towards Deanville Road; and documenting all Site activities.

2.1.2 Response Actions to Date

See above.

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

On-Scene Coordinator continues to coordinate work with an EPA Enforcement Coordinator and legal team.

2.1.4 Progress Metrics (see POLREPS 1 & 2 for previous waste stream T&D reporting)

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
RQ, NA3077, Hazardous waste, solid, n.o.s., (Chromium), 9, PHIII, (F008), ERG #171	Soil	64 Dump Trucks (approximate total of 2112 ton)	3203JJK - 3232JJK 3244JJK - 3249JJK 3310JJK - 3332JJK 3250JJK - 3253JJK 3250JJK (7/13/2011-7/25/2011)	None	Wayne Disposal, INC Site 2 Landfill 49350 N I-95 Service Drive Belleville, MI 48111. EPA ID #: MID 048 090 633
Various Waste Flammables, Toxics, Paint Related Material, Caustic Alkali Liquids, non-RCRA, non-DOT Regulated Material, Polychlorinated biphenyls	Various sized containers.		008335711JJK, 008335728JJK, 008335710JJK, 008335709JJK		Various, see manifests for details.
Expired Fluorescent Light Bulbs, Expired Mercury Apparatus, Expired TV, and Expired Sodium Lamps for Recycle		Expired Fluorescent Light Bulbs, Expired Mercury Apparatus, Expired TV, and Expired Sodium Lamps for Recycle	Bill of Lading	None	Complete Recycling Solutions LLC, 1075 Airport Road, Fall River, MA 02720
Expired		2 Refrigerators,	Bill of Lading	None	Interstate

Refrigerators for Recycle, Propane 2.1 UN 1978, Acetylene, dissolved, 2.1 UN 1001		1x55 DF propane, 1x15DF Acetylene			Refrigerant Recovery INC., 12 Morse Place, Foxborough, MA 02035
RQ, NA3077, Hazardous waste, solid, n.o.s., (cyanide, chromium), 9, PGIII, (D007, F008), ERG #171	Solids	15 trailer dump trucks with a total of 342 tons of material	008234434JJK, 008234433JJK, 008234431JJK, 008234432JJK, 008234430JJK, 008234397JJK, 008234396JJK, 008234395JJK, 008234380JJK, 008234381JJK, 008234436JJK, 008234437JJK, 008234435JJK, 008234383JJK, 008234382JJK	None	Envirite of Pennsylvania, Inc., 730 Vogelsong Road, York, PA 17404
Propane 2.1 UN 1978		50 lb container	Bill of Lading	None	Interstate Refrigerant Recovery Inc. 12 Morse Place, Foxborough, MA 02035

2.2 Planning Section

2.2.1 Anticipated Activities

- Continue to excavate contaminated wetlands behind facility;
- Excavate contaminated soil beneath former building footprint;
- Finalize engineering design / plan for watershed management associated with Bliss Brook and residential removal activities (U.S. Army Corps of Engineers and Weston Solutions Specialized Labor);
- Conduct drilling operations so EPA's ERT in conjunction with EPA's engineering consultants will design and implement in-situ treatment of contaminated groundwater and soil;
- Excavate and/or consolidate and cap residential contaminated soil in-situ;
- Begin to excavate additional (previously-unidentified during prior site investigations) contaminated wetlands to the southwest of the facility that have total chromium and lead contamination well in excess of industrial and residiential Massachusetts Contingency Plan levels; and
- Complete the construction of the Bliss Brook Bypass system to control excess water in the work area and maintain.
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2.2.1.1 Planned Response Activities

See Above.

2.2.1.2 Next Steps

- Continue to relocate residents during removal activities in residential areas as necessary to maintain safety and efficiency of response activities;
- Complete the Bliss Brook pipe bypass system to eliminate excess water through removal area;
- Excavate and dispose of or consolidate and cap contaminated soils in residential areas;
- Excavate and dispose of contaminated soils behind (and under) the former W&L facility;
- Provide flood-plain storage capacity to off-set any loss of capacity in the vicinity of the Bliss Brook excavation;
- Install and maintain erosion and sedimentation controls, as necessary; and
- Restore all properties in accordance with local, state and federal requirements.

2.2.2 Issues

Engineering designs for excavation / consolidation / drainage / capping the impacted residential neighborhood, as well as plans for floodplain and watershed restoration must be finalized prior to the removal activities in the wetlands behind residential properties and adjacent to Bliss Brook. This is an engineering challenge due to complex subsurface (a thick layer of structurally weak, organic peat) and watershed issues in the area. This thick layer of peat was discovered during the exploratory geotechnical drilling operations, and geotechnical laboratory tests were performed on the material extracted from the subsurface. A geotechnical engineer, after reviewing the results from these tests, has determined the peat to be unsuitable for use as the structural foundation for the engineered cap. The layer of organic peat, approximately 12 to 17 feet thick in places, has minimal strength and has been a continuous nuisance for

construction vehicles.

Due to construction-related noise and nuisance, relocation services for families in the residential area were made available for the most impacted residents. This service is being provided by the Army Corps of Engineers, and the EPA OSCs are coordinating with the Army Corps Relocation Expert to ensure this is a smooth process.

During the excavation of contaminated soils from behind the Walton & Lonsbury facility, the levels of total chromium and lead did not drop off as we reached the southern portion of the wetlands. Historically, studies had indicated the extent of contamination was roughly bound by the chain-link-fence previously installed by Walton & Lonsbury in 2001. During a secondary sampling event, it became evident that levels of total chromium and lead began increasing toward the south-western portion of the wetlands. After this was discovered, the direction of exploration changed towards the former building to begin chasing the waste pipes to determine historical discharge locations. All previous reports had incidated that a pipe, approximately 150 feet in length originated at the south wall of the plating room and deposited sludge and liquid waste into the wetlands. During the excavation, the former dry well and two eras of pipe (pre-1945 and post-1945) were uncovered, and it could be seen that these had directed the liquid waste towards the southwest of the property. Through a review of literature and oral references, it was determined that an unnamed stream once flowed along the western boundary of the W&L property in which this liquid waste appears to have directly discharged. This stream has since been hard piped, and discharges out from beneath the adjacent industrial facility. The wetland to the south of this discharge line was found to have chromium and lead levels well in excess of Massachusetts Contingency Plan industrial (and residential) direct exposure criteria standards.

EPA has performed additional Site Investigations (PASI #4 and PASI #5) in the summer of 2011 to the south of this area to determine the full extent of the contamination caused by the former discharge practices. During these sampling events it became evident that levels of total chromium and
lead began increasing toward the south-western portion of the wetlands and continued along surface water flow toward Deanville Road. The results of PASI # 5 have not been finalized.

2.3 Logistics Section

Personnel:

- EPA will maintain a Site presence with 2 Federal On-Scene Coordinators.
- EPA will occassionally use U.S. Coast Guard Atlantic Strike Team and OSCs from Region 2 from time-to-time to supplement oversight activities.
- ERRS personnel are expected to remain constant throughout the next few operational periods (1 Removal Manager, 1 Field Cost Accountant, 2 Equipment Operators, 1 truck driver, 2 laborers and 1 chemical technician).
- START personnel level of effort will remain the same.

Equipment & Supplies:

- Two swamp dumptrucks - used to transport clean fill during cap construction.
- Three excavators - for use during excavation, cap construction and T&D load-out activities.
- One dump truck - for transporting material on public road between eastern and western division.
- One water truck - for decontamination activities and dust suppression.
- One bobcat - for moving materials, maintaining roads, and general Site maintenance.
- A wastewater treatment system, two frac tanks, and a mud tank have been mobilized to the Site and will continue to treat water during excavation activities

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

Safety Officer: Elise Jakabhazy, US EPA

See POLREP 1

All-hands health and safety meetings are held daily prior to the commencement of work.

ERRS also conducts a hazard safety analysis with all employees during each new phase of construction.

2.6 Liaison Officer

EPA OSCs serve as liaison officers.

Liaison Officer (LNO) = Elise Jakabhazy
Assistant Liaison Officer (ALNO) = Elsbeth Hearn

See Polrep 1 for information on previous liason officer activities.

2.7 Information Officer

2.7.1 Public Information Officer

EPA personnel continue to provide face-to-face meetings with the residents to keep them informed of activities on-Site. Three public meeting have been conducted since the finalization of Polrep 2. A meeting for impacted residents was held on the evening of June 16th, a public meeting for all parties interested in hearing about removal activities at the Site was held on the evening of June 22nd, and a meeting directed towards the residents of the Brookside Apartments on North Avenue was held in the afternoon of June 23rd. Each of these meetings was attended by EPA, EPA contractors, MassDEP, Massachusetts Department of Public Health, and the Attleboro Health Department. The meetings were also attended by a number of local and state politicians.

See Polrep 1 for more information.

3. Participating Entities

3.1 Unified Command

United States Environmental Protection Agency (EPA)
Massachusetts Department of Environmental Protection (MassDEP) *

** MassDEP is listed as a Cooperating or Assisting Agency, since they are not providing funds for the Removal Action. They are, however, listed as part of Unified Command while on-Site. They are not directing contractors work, and they do not sign the Incident Action Plan.*

3.2 Cooperating Agencies

- Massachusetts Department of Environmental Protection (MassDEP)
- Army Corps of Engineers (USACE)
- Massachusetts Department of Public Health (MA DPH)
- Agency for Toxic Substances and Disease Registry (ATSDR)

4. Personnel On Site

Two (2) EPA OSCs

One (1) START Personnel - for Removal Action

Four - Thirteen (4-13) ERRS Personnel [GES" Guardian Environmental Services (with Shaw Group, subcontractors to GES, and various other subcontractors including Moran Environmental)]

One (1) START Personnel - for extended Site Investigation (To organize data from December 2010 PA/SI and assist in the topographical survey).

5. Definition of Terms

EPA = U.S. Environmental Protection Agency
MassDEP = Massachusetts Department of Environmental Protection
START = Superfund Technical Assistance Response Team (EPA Contractor)
ERRS = Emergency & Rapid Response Services (EPA Contractor)
SVOCs = semi-volatile organic compounds
VOCs = volatile organic compounds

6. Additional sources of information

6.1 Internet location of additional information/report

Go to http://www.epaosc.org/site/site_profile.aspx?site_id=6355 for additional documentation and photographs.

6.2 Reporting Schedule

The next POLREP will be submitted in Mid-November (approximately November 15th)

7. Situational Reference Materials

See documents section of the web site to find a copy of the Preliminary Assessment / Site Investigation, the the Site Closure Memo and the Action Memo.