

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: POLREP #4
Progress
Former Tombarello & Sons Property Site
01FQ
Lawrence, MA
Latitude: 42.7174990 Longitude: -71.1410129

To: Polrep Distribution, USEPA-R1
Records Center, USEPA R1

From: Eric Vanderboom, OSC

Date: 5/10/2011

Reporting Period:

1. Introduction

1.1 Background

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

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]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.

Table 1: Tombarello Site Northern Property Line Contaminant Concentrations in mg/kg (ppm)

	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	

Table 2: Tombarello Site Residential Contaminant Concentrations in mg/kg (ppm)

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 on 10/5/2010.
- ERRS began phase 2 -residential removal action- on 5/9/2011.

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. Five residences were 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.

The PRP has signed an Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action on the industrial part of the site. The agreement went into affect on April 26, 2011 and work by the PRP's contractors began two days later.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal

2.2 Planning Section

2.2.1 Anticipated Activities

- Prepare residential yards for tree removal and excavation activities.
- Perform residential removal per sampling results after the PRP completes the removal action on the Tombarello property.
- Field screen excavated areas and backfill once cleared.
- Restore residents yards with plants, trees, shrubs, hydroseed and repair response related damages.

2.2.1.1 Planned Response Activities

See above.

2.2.1.2 Next Steps

- Dispose of contaminated soil.

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

No information available at this time.

2.4 Finance Section

Project will be incrementally funded.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$1,029,000.00	\$91,954.00	\$937,046.00	91.06%
TAT/START	\$176,000.00	\$63,667.00	\$112,333.00	63.83%
Intramural Costs				
USEPA - Direct	\$53,100.00	\$0.00	\$53,100.00	100.00%
USEPA - InDirect	\$680,740.00	\$0.00	\$680,740.00	100.00%
Total Site Costs				
	\$1,938,840.00	\$155,621.00	\$1,783,219.00	91.97%

* 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

2.5.1 Safety Officer

The OSC is acting as the Safety Officer.

2.6 Liaison Officer

The OSC is acting as the Liaison Officer.

Significant liaison with MassDEP, MADPH, ATSDR and City of Lawrence.

2.7 Information Officer

2.7.1 Public Information Officer

The OSC is acting as the Public Information Officer.

Press release drafted and set to be distributed this week.

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.

3. Participating Entities

3.1 Unified Command

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

3.2 Cooperating Agencies

- MassDEP
- MADPH
- City of Lawrence
- Residents
- EPA Community Involvement Staff and ATSDR.

4. Personnel On Site

EPA: 1 OSC, 1 to 2 CIC/ATSDR as required

ERRS: 3 to 6

START: 1

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.

