U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
The Former Bendix Property Site - Removal Polrep

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
**Region I**

**Subject:** **POLREP #3**
**Progress**
**The Former Bendix Property Site**
**01GR**
**Greenfield, MA**
**Latitude: 42.5772900 Longitude: -72.6182460**

**To:**
**From:** Athanasios Hatzopoulos, OSC
**Date:** 7/18/2011
**Reporting Period:** 6/13/11 to 7/15/11

## 1. Introduction

### 1.1 Background

| | | | |
|---|---|---|---|
| **Site Number:** | 01GR | **Contract Number:** | |
| **D.O. Number:** | | **Action Memo Date:** | 2/22/2011 |
| **Response Authority:** | CERCLA | **Response Type:** | Time-Critical |
| **Response Lead:** | EPA | **Incident Category:** | Removal Action |
| **NPL Status:** | Non NPL | **Operable Unit:** | |
| **Mobilization Date:** | 4/13/2011 | **Start Date:** | 4/13/2011 |
| **Demob Date:** | | **Completion Date:** | |
| **CERCLIS ID:** | MAD041490673 | **RCRIS ID:** | |
| **ERNS No.:** | | **State Notification:** | |
| **FPN#:** | | **Reimbursable Account #:** | |

#### 1.1.1 Incident Category
Inactive industrial/storage facility

#### 1.1.2 Site Description
The Former Bendix Property Site (the Site) is an abandoned industrial facility that was primarily used for metalworking, including the milling and grinding of steel drill bits and taps. The Treadwell Tool Co. built the facility in 1961. In 1982, Bendix Corp., a predecessor to Honeywell International Inc. (Honeywell), purchased the property and sold it to B.C. Acquisition, a subsidiary of Besly Products, in 1984. Besly Products merged with Allied Signal Inc., which is known as Honeywell International, Inc., (Honeywell). Besly Products operated the Site from 1984 to 1998, when it was sold to Repal Inc., a wood pallet storage and processing company. In June of 2008 the Town took the property for back taxes.

Currently, the Site is partially fenced, inactive, abandoned for approximately 10 years, and consists of a single parcel of land totaling 17.3 acres. The land is developed with two buildings. The first is an approximate 94,000 square-foot (sq ft) single-story, slab on grade concrete block industrial building that is located along the south-central region of the Site. General public access is unrestricted as evidenced by the presence of burned debris piles within the building, and graffiti inside and outside of the building. The Town of Greenfield is the current owner of the Site.

Approximately 85% of the 94,000 sq ft building is filled with various materials including wood pallets (stacked from 5 to 15 ft high or to ceiling height), other bins containing building debris and/or plastic LEGOS, machinery, drums and various other size containers, and numerous ½ cubic yard plastic bags containing a white powder. The buildings inoperative heat and water piping system is currently on the ceiling and walls, and is wrapped by asbestos containing insulating wrap. Because of the deterioration of the roof, severe water damage has occurred throughout the entire building. This has caused a great deal of the pipe wrap to fall on the floors and cross-contaminate whatever material exists directly underneath. Approximately 380 discarded metal and/or plastic 55 gallon drums, and other various sizes containers, exist throughout the entire (interior/exterior) grounds of the Site.

Due to the conditions and potential threat of release of the hazardous materials from the Site, on July 20, 2010, the EPA Brownfields Program referred the Site to the Emergency Planning and Response Branch (EPRB) for further investigation.

The PA/SI was concluded and based on Site conditions and analytical results, a Time Critical Removal Action was recommended in a closure memorandum dated December 15, 2010. On February 22, 2011, an Action Memorandum to conduct the Removal Action was signed by the Acting Office Director of the Office

of Site Remediation and Restoration.

**1.1.2.1 Location**
The Site is located at 180 Laurel Street, Greenfield, Franklin County, Massachusetts (Longitude/Latitude 42E 34' 36.85"N, 72E 37' 4.71"W). The Site is more fully described as Map R41 Lot 2 in the Town of Greenfield Tax Assessor's Office. The Site is in a residential area and is zoned "GI-General Industrial." Residential properties and a public storage building abut it to the north, interstate 91 to the west, a cemetery and residences to the south, and woodlands followed by residential properties are located east.

**1.1.2.2 Description of Threat**
Hazardous substances involved in the release or threat of release at the Site include, but are not limited to: friable asbestos and ACM within the building, chromium contamination within the cubic yard bags containing the white talcum like powder, and VOCs in drums. The areas that were sampled are exposed to the elements. Friable asbestos and chromium may pose a health threat to anyone walking on, traveling by, or living near the Site. Because the building roof has openings, the threat of release of the friable asbestos and chromium to adjacent areas and other receptors exists, particularly during adverse weather conditions. In addition, the building is abandoned and lacks a functioning fire suppression system. In the event of a fire, aforementioned substances will become airborne and migrate to the surrounding areas. The VOCs were detected in drums that are abandoned on the exterior grounds of the Site. The Site currently has a partial fence around its perimeter. However, the Town officials have stated that the Site is being accessed by unauthorized individuals.

According to the 2000 census 2,420 people live within one mile radius. Within one mile are also a public school, and two nursing homes.

**1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**
On November 4, 2010, the EPRB and its Technical Assessment and Response Team, Weston Solutions, Inc., conducted a Preliminary Assessment and Site Investigation (PA/SI). The PA/SI revealed the following but not limited to, hazardous substances pollutants or contaminants:

| MEDIA | HAZARDOUS SUBSTANCES OR POLLUTANTS OR CONTAMINANTS | MAXIMUM CONCENTRATION | APPLICABLE MassDEP SOIL CLEANUP STANDARDS MCP S-1 |
|---|---|---|---|
| Pipe insulation from the overhead water and heat piping systems that has disintegrated and fallen on the floors | Friable asbestos (amosite and chrysotile) | >1% | |
| Liquids in drums located on the exterior grounds of the Site | Volatile organic compounds (VOCs) | | |
| | Acetone | 67 mg/Kg | 6 mg/Kg |
| | Toluene | 150 mg/Kg | 30 mg/Kg |
| | Methyl Tert Butyl Ether | 69 mg/Kg | .1 mg/Kg |
| White powder in cubic yard bags | Inorganic contaminants (chromium) | 370 mg/Kg | 30 mg/Kg |

**2. Current Activities**

**2.1 Operations Section**

**2.1.1 Narrative**

**2.1.2 Response Actions to Date**
On April 13, 2011, EPA, and ERRS initiated the Removal action by conducting a site walk to discuss upcoming removal activities.

**April 25 to 29, 2011**
Activities for the week included:

- Mobilizing the ERRS crew and equipment.
- Reviewing and signing the site health and safety plan (HASP).
- Installing high-visibility fencing to close off the perimeter of the Site.
- Establishing markers to delineate work zones.
- Clearing paths in the building and parking lot for safer walking and equipment access.
- Staging all empty drums and containers dumped throughout the property in one central location.
- Screening bags of powder in-situ with an Innox-X-Ray Fluorescence (XRF) Analyzer throughout the building to confirm chromium contamination.
- Consolidating all white powder material from the outside into one central location in the western parking lot.
- Preparing for the asbestos-containing material (ACM) removal activities.

Under the direction of the OSC, START personnel went through the building and in-situ analyzed by XRF bags of powder for chromium levels. The results were of varying levels ranging from non-detect to over 700

parts per million (ppm) for chromium. On site screening of the bags of powder continued for another week to better determine transport and disposal (T&D) options and sampling possibilities.

START photo documented the removal areas prior to the commencement of removal activities. START will also photodocument daily removal activities during the duration of the removal action. START at the direction of the OSC will perform air monitoring, every day at four locations around the perimeter of the Site, to ensure that asbestos particulates are not escaping into the environment as a result of the removal activities. START will follow this protocol during the entire duration of the removal action.

**May 2 to 6, 2011**
Activities for the week included:

- Removing pallets and other debris from inside the building and relocating the material to the parking lot, so the workers can access all asbestos inside the building.
- Staging all empty drums and containers and some containing liquid dumped throughout the property in one central location on site.
- Collecting samples of powder from bags inside the building to screen with an XRF Analyzer and determine where some of the highest levels of chromium are located.
- Consolidating all white powder material from the outside into one central location in the western parking lot.
- Performing ACM removal inside the building.
- Conducting air sampling for asbestos both around the perimeter of the site and on personnel.

All drums and containers from the entire site were staged in one central location. The emptied containers were turned upside down. Any drums with liquid were separated, so hazardous categorization (HazCat) can be performed. Any additional drums found in the building were added to this area throughout the Removal Action.

At the beginning of asbestos removal, three initial days of air sampling for asbestos at four locations was conducted along the perimeter of the Site and on two personnel performing the asbestos removal tasks, per the site HASP. After laboratory analysis had non-detect results for asbestos, personal sampling was conducted once a week.

**May 9 to 13, 2011**
Activities for the week included:

- Continuing to remove pallets and other debris from inside the building and relocate the material to the parking lot, so the workers can access all asbestos inside the building.
- Overpacking four leaking drums and placing them in the drum staging area.
- Collecting four samples of powder from bags inside the building for T & D analyses.
- Covering all the consolidated white powder material that is located outside with polyethylene (poly) until further notice.
- Performing ACM removal inside the building.
- Conducting air monitoring for particulates at four locations around the perimeter of the site while debris was being transported daily.

The powder that was outside when ERRS arrived was all consolidated to the western side of the property in the parking lot, where most of the powder originally was located. All of this powder comprised of two piles, approximately 1,350-cubic-yard (yd3) that were covered with poly. Approximately 1,200 additional yd3 of powder remained inside the building.

**May 16 to 20, 2011**
Activities for the week included:

- Continuing to remove pallets and other debris from inside the building and relocate the material to the parking lot.
- Performing ACM removal inside the building.
- Placing all double-bagged ACM into the lined roll-off container for off site disposal.
- Collecting additional powder samples and sending them to OEME for XRF analysis.

All friable ACM removed from the building was double-bagged and sealed. The bags of asbestos were placed in a double-lined 30 (yd3) roll-off container for disposal. The container remained on site daily until it was full.

On May 19, 2011, OSC Hatzopoulos held a meeting on site with US Agency for the Toxic Substances and Disease Registry (ATSDR) Perlman, MassDEP Fish, Greenfield Fire Department Jarvis, and Greenfield Health Department Zabko. A Site walk was conducted and the large quantity of powder was discussed during the meeting.

On May 20, 2001, 10 powder samples were collected and sent to NERL for metal analysis by XRF.

**May 23 to 27, 2011**
Activities for the week included:

- Continuing to remove pallets and other debris from inside the building and relocate the material to the parking lot.
- Performing ACM removal inside the building.
- Placing all double-bagged ACM into the lined roll-off container for off site disposal.
- Conducting air monitoring for particulates at four locations around the perimeter of the site while debris was being transported daily.

This week the weather changed drastically from the weeks past, and it was drier with much higher temperatures. To minimize any dust or particulates created from the work area, all of the debris was wetted

down prior to leaving the building area and the roadway that the dump truck traveled was sprayed with water periodically.

On May 31, 2011 EPA requested ATSDR to review the public health implications of the white powder located on at the Site.

**May 31 to June 3, 2011**
Activities for the week included:

- Continuing to remove pallets and other debris from inside the building and relocate the material to the parking lot.
- Performing ACM removal inside the building.
- Placing all double-bagged ACM into the lined roll-off container for off site disposal.
- Conducting air monitoring for particulates at four locations around the perimeter of the site while debris was being transported daily.

On May 31, 2011, NERL confirmed the presence of chromium in 9 of the 10 samples. The highest level was 640 ppm.

On June 1, 2011 ATSDR in a letter to EPA concluded that the piles of powder represented a public health hazard and recommended that exposure to all piles be prevented.

On June 1, 2011, the Greenfield area was on tornado watch and a severe thunderstorm came through the area. There was no destruction to the Site, and the piles of powder remained covered with poly without damage.

**June 6 to 10, 2011**
Activities for the week included:

- Continuing to remove pallets and other debris from inside the building and relocate the material to the parking lot.
- Performing ACM removal inside the building.
- Placing all double-bagged ACM into the lined roll-off container for off site disposal.
- Conducting air monitoring for particulates at four locations around the perimeter of the site while debris was being transported daily.
- Conducting air sampling for asbestos at four locations around the perimeter of the Site.

Another three days of asbestos air sampling around the perimeter of the Site was conducted this week. ACM removal was taking place in areas of an open warehouse instead of in an area filled with debris.

By the end of this week, the majority of the western half of the building has been cleared of debris excluding the office area and areas covered with powder. The powder has not been disturbed until the off site disposal plan has been finalized.

In addition to a known pit within the building an additional pit was discovered during the removal action. Both pits are currently full of water. Asbestos debris, ACM and drums/containers are visible within. Samples will be collected next week and will be analyzed for content.

**June 13 to 17, 2011**

Activities for the week included:

- Continuing to remove pallets and other debris from inside the building and relocate the material to the parking lot.
- Performing ACM removal inside the building.
- Placing all double-bagged ACM into the lined roll-off container for offsite disposal.
- Conducting air monitoring for particulates at four locations around the perimeter of the Site while debris was being transported daily.
- Collecting water samples from the two pits and sending the samples to NERL for analysis.

On June 16, 2011, three water samples plus one duplicate sample was collected and sent to NERL to be analyzed for VOCs, SVOCs, pH, oil identification, metals, cyanide, pesticides, and PCBs. The liquid samples were collected from pits located in two different rooms of the building that had previously been boarded up.

**June 20 to 24, 2011**
Activities for the week included:

- Continuing to remove pallets and other debris from inside the building and relocate the material to the parking lot.
- Performing ACM removal inside the building.
- Placing all double-bagged ACM into the lined roll-off container for offsite disposal.
- Conducting air monitoring for particulates at four locations around the perimeter of the site while debris was being transported daily.
- Conducting hazardous categorization (HazCat) on drums with product to determine the proper disposal necessary.

On June 20, 2011, 51 containers were HazCat tested for disposal. One 30-gallon fiber drum full of a solid product was a hazardous caustic material. It was overpacked and prepped for disposal. The remaining 50 containers contained nonhazardous product.

On June 22, 2011, NERL provided the VOC and SVOC results for the liquid samples collected. (for results see Document Section of the Pol/SitRep)

**June 27 to July 1, 2011**
Activities for the week included:

- Removing the last of the clean pallets and other debris from inside the building and relocating the material to the parking lot.
- Performing ACM removal inside the building.
- Placing all double-bagged ACM into the lined roll-off container for offsite disposal.
- Removing all switches containing mercury from inside the building for offsite disposal.
- Conducting air monitoring for particulates at four locations around the perimeter of the site while debris was being transported daily.

On June 28, 2011, a health and safety audit was conducted on site by the US EPA Health and Safety Manager.

**July 5 to 8, 2011**
Activities for the week included:

- Performing ACM removal inside the building.
- Placing all double-bagged ACM into the lined roll-off container for offsite disposal.
- Continuing to conduct air monitoring for particulates at four locations around the perimeter of the site while the debris is staged outside and work continues inside the building.

On July 5, 2011, NERL provided the pH results for the liquid samples collected. (for results see Document Section of the Pol/SitRep)

On July 8, 2011, one 30 cubic yard roll-off container with friable asbestos was sent to the CERCLA approved landfill facility, Minerva Enterprises Landfill of Waynesburg, Ohio.

**July 11 to 15, 2011**
Activities for the week included:

- Performing ACM removal inside the building.
- Placing all double-bagged ACM into the lined roll-off container for offsite disposal.
- Loading the lined roll-off container with ACM debris that was previously consolidated inside the building.
- Continuing to conduct air monitoring for particulates at four locations around the perimeter of the site while the debris is staged outside and work continues inside the building.
- Sending ACM debris to the CERCLA approved disposal facility in Waynesburg, Ohio.

On July 12,13 and 14, 2011, NERL provided the Pesticide, PCB, Cyanide, and Oil ID results for the liquid samples collected. (for results see Document Section of the Pol/SitRep)

On July 13 and 14, 2011, four- 30 cubic yard roll-off containers with friable asbestos were sent to the CERCLA approved landfill facility, Minerva Enterprises Landfill of Waynesburg, Ohio.

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

2.1.4 Progress Metrics

| *Waste Stream* | *Medium* | *Quantity* | *Manifest #* | *Treatment* | *Disposal* |
|---|---|---|---|---|---|
| | | | | | |
| | | | | | |
| | | | | | |

### 2.2 Planning Section

#### 2.2.1 Anticipated Activities

- Secure the Site to prevent unauthorized access.
- Conduct the removal and disposal of asbestos and asbestos contaminated material. The process shall include provisions for onsite decontamination of larger debris, and segregation of asbestos-free debris from inside the building. Asbestos waste will be documented, and shipped off site for disposal at EPA-approved facilities.
- Collect and dispose to EPA approved facilities any material that contains chromium according to the ATSDR consult.
- Containerize and ship offsite any hazardous materials found, to EPA-approved facilities.
- Conduct a visual inspection of the building for mercury containing switches. Containerize and ship offsite, any mercury found to EPA-approved facilities.

#### 2.2.1.1 Planned Response Activities

#### 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

No information available at this time.

## 4. Personnel On Site

No information available at this time.

## 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.