

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region I

**Subject:** **POLREP #6**  
**Initial-PRP removal**  
**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:** 9/26/2011

**Reporting Period:** 4/28/2011 to 9/26/2011

## 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>      | PRP          | <b>Incident Category:</b>      | Removal Action |
| <b>NPL Status:</b>         | Non NPL      | <b>Operable Unit:</b>          | N/A            |
| <b>Mobilization Date:</b>  | 4/27/2011    | <b>Start Date:</b>             | 4/28/2011      |
| <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. 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.

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 had been detected throughout the back yards.

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.

The maximum concentration for lead (the driving contaminant) in the residents yards was 7000 mg/kg (ppm).

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

#### 2.1.2 Response Actions to Date

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

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

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 removal work by the PRP commenced on April 28, 2011.

#### 2.1.4 Progress Metrics

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

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

#### 2.2.1.1 Planned Response Activities

- Establish a command post and staging area which will include a portable restroom and water

- service, or access to water service via a temporary meter/fire hydrant
- Preparation of a Health & Safety Plan which will include measures for decontamination of working personnel and equipment.
- Perform air monitoring for dust with DataRAM, DustTrack II or similar monitoring equipment. Supplies needed for dust suppression must be readily available if and when determined to be necessary.
- Removal of concrete blocks located along the western edge of proposed excavation area. The blocks will be relocated and stacked on a paved area of the property.
- Clearing of trees located within excavation area. Removed trees will be chipped on-site. Tree chippings will be added to existing mulch stockpiles. Trees that cannot be chipped will be removed from the site.
- Relocation of existing stockpile present within proposed excavation area.
- Installation of haybales along the residential property line. The haybales will be placed on excavated edge of fence line following placement of clean fill and berm in that area. Haybales will be placed on top of berm and remain at project completion.
- Preparation of soil stabilization area to encompass an approximate 150'x 150' area located on the southern portion of the property. Preparation activities will include the following:
  - An approximate 15'x30' area of petroleum-impacted soil beneath the excavator to be removed and relocated on-site will be excavated to a depth of 6 inches. Stockpiled soils will be placed on and covered with 6-mil polyethylene sheeting. Soils removed from that area will be stockpiled separately on-site while awaiting documentation. Contractor shall sample stockpile for receiving facility requirements. Soil shall be disposed at a permitted RCRA/TSCA facility.
  - Additional preparation of the soil stabilization area will include removal of 20'x65'x1' reinforced concrete slab. Slab shall be stockpiled on-site.
  - Surround soil stabilization area with staked haybales.
  - A layer of non-biodegradable filter fabric with an overlapping 3 foot seams will be placed on 150'x150' soil stabilization area prior to placement of excavated soils.
- Excavation of a 600'x50' area of soil on the former Tombarello Property. Soil will be excavated to a depth of 1 foot below surface grade.
- Relocation of excavated soil on-site to soil stabilization area.
- Stumps that cannot be placed in the stabilization area due to size shall be removed off-site with the contaminated soil referenced above.
- Placement of non-biodegradable filter fabric on base of completed excavation with 3 feet overlapping seams.
- Backfilling of excavation with common borrow.
- Loam and hydro-seeding of backfilled excavation area.
- Stabilization of excavated soils on-site. Soil stabilization area will be covered with nonbiodegradable filter fabric, followed by 4 inches of loam and hydro-seeded.
- Hydro-seeding additional exposed areas of the Tombarello Property as directed.
- Removal of miscellaneous OHM containers located on the Tombarello Property. Oily solids beneath the OHM storage area will be drummed and removed from the Tombarello Property.
- Placement of appropriate signage indicating that the Site is contaminated. Signs will be placed every 100 feet on existing fencing along the western (Marston Street), southern (recreational field) and eastern (Route 495) portions of the Tombarello Property. Signage will be installed on posts every 100 feet along the boundary of the abutting waste management facility. It is anticipated that approximately 25 signs will be placed on existing fencing and approximately 12 signs will be placed on posts along the Waste Management boundary.

#### **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**

### **3.1 Unified Command**

### **3.2 Cooperating Agencies**

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

## **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.

POLREP #6 Last Updated 6/18/2018