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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: **POLREP #4**
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: 11/17/2011
Reporting Period: 09/07/2011 - 11/17/2011

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 and Polrep 2 through Polrep 3 for activities since initial Site preparation.

ERRS Activities since the last Polrep included: the set up and daily operation of an onsite water treatment system and pumps for excavation water (operated intermittently due to operations through October and

November); construct the Bliss Brook Bypass system by placing and grading clean bedding material supporting a 36" pipe that diverts the flow of the brook; construct headwall, hydraulic apron, and dam at the end of the bypass pipe to direct the flow of water; pump the brook 24 hours a day during the construction of the Bliss Brook Bypass system to control excess water in the construction area; overseeing of survey subcontractor to verify the location of the Bliss Brook Bypass system placement and lay out markings for engineered drainage controls and berm; placing "choke" fill after removing some wetland soil adjacent to the headwall of the Bliss Brook Bypass system; treating excavated soil with corn cob to increase strength and transporting soil from Eastern Operations Division to Western Operations Division; constructing berm on top of "choke" fill area for controlling water in the wetlands; backfilling areas adjacent to the planned engineered cap to assure proper drainage.

START activities since the last polrep included: deploying perimeter particulate monitors at 7 locations on- and off-Site; conducting Site visits and conference calls with engineers for the design of the residential removal activities planned for 2011/2012; overseeing survey subcontractors installing property boundary markers; arranging the administrative record after the submittal of the Action Memo dated September 2011; 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 Refrigerators for Recycle, Propane 2.1 UN 1978, Acetylene, dissolved, 2.1 UN 1001		**2 Refrigerators, 1x55 DF propane, 1x15DF Acetylene**	**Bill of Lading**	**None**	**Interstate 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);
- Complete the design and anticipated implementation of in-situ treatment of contaminated groundwater and soil in conjunction with EPA's ERT and EPA's engineering consultants;
- Excavate and/or consolidate and cap residential contaminated soil in-situ;
- Work with MassDEP to develop a plan to protect human health and the environment from the 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;
- Begin to restore clean wetland area behind facility.

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 (including associated dams) 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. From these results, it is evident that the contamination follows the path of the unnamed stream that flowed south away from the facility through the wetlands. EPA is actively working with MassDEP to determine the next steps for this area.

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 decrease to 1 during the next operational period.

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
- One front end loader (stored on Site and can be utilized if necessary)
- One mini-excavator (stored on Site and can be utilized if necessary)

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. Since Polrep 3, one "fact sheet" update has been distributed local residents to provide additional information about the Site.

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)]

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-February (approximately February 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.