

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Hilton Chrome - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: POLREP #1
Initial
Hilton Chrome
01HW
Lawrence, MA
Latitude: 42.7144000 Longitude: -71.1749000

To:
From: Karen Way, OSC
Date: 6/4/2012
Reporting Period: May 9 - June 01, 2012

1. Introduction

1.1 Background

Site Number:	01HW	Contract Number:	
D.O. Number:		Action Memo Date:	4/4/2012
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	5/9/2012	Start Date:	5/9/2012
Demob Date:		Completion Date:	
CERCLIS ID:	MA5000002675	RCRIS ID:	MA5000002675
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA-funded time critical removal action

1.1.2 Site Description

The Hilton Chrome site is a two-story industrial building located at 75 Holly Street, Lawrence, Essex County, Massachusetts (MA). The building has been used as a metal plating facility since at least 1977. The facility is currently owned by RKM Trust, and it is operated under the name Hilton Chrome Corporation. RKM Trust also owns the southern and eastern adjacent lots.

The building is a one- and two-story structure with a partial basement, and is divided into three wings (South, East, and West). The second floor of the western end of the building was destroyed by a fire that reportedly occurred in 1968. The building directly abuts the sidewalk on Holly Street, and a paved parking area is located between the street and the south wing. There is a paved driveway located on the northern adjacent property that was used by Hilton Chrome personnel to access the rear of the building. There are bay doors located on the west side of the South Wing, and at the northeastern corner of the East Wing. The area between the South and East Wings is overgrown with vegetation and brush. Debris, empty vats, vehicle parts, and a dumpster are located in the rear yard, at the east end of the building.

1.1.2.1 Location

The Site is located at 75 Holly Street in Lawrence, Essex County, Massachusetts. It is in a mixed residential/industrial area.

Latitude 42° 42' 51" north
Longitude 71° 10' 28" west

The Site is bounded:

- * to the South - Holly Street and commercial and residential buildings
- * to the West - Holly Street and commercial and residential buildings
- * to the North - industrial/commercial properties and the Spicket River
- * to the East - industrial/commercial properties and the Spicket River

1.1.2.2 Description of Threat

The building contains a significant number of vats and drums containing chemicals and liquids used in the metal plating process. The building is minimally secured, and sits on the Spicket River, which has flooded in the past. There are several areas in the building that are structurally compromised, including the roof, the second floor of the west wing, and the support beams in the east wing.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

A Preliminary Assessment/Site Investigation (PA/SI) was conducted in January 2012. Personnel observed the condition of the building, and the hand-written labels on the vats and drums, applied by the property owner. Personnel collected samples of several containers for laboratory analysis for metals. Metal results of the samples indicated the presence of lead, barium, chromium, and cyanide.

Personnel also collected samples for on-site analysis with an Ahura(R) Raman Spectrometer. Results were used to verify the contents based on the owner's labels, and to determine which containers required further analysis. Personnel also used pH paper to determine the acidity or alkalinity of the contents.

Please see the PA/SI report, located in the Documents section, for more information or analytical results.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

A site walk was conducted on May 4, 2012, with EPA OSC Karen Way, EPA Enforcement Coordinator Tina Hennessy, an Emergency Rapid Response Services (ERRS) Response Manager (RM), and a representative for the responsible party (RP) to verify and procure necessary resources to complete the removal action.

2.1.2 Response Actions to Date

The following activities were performed during this reporting period:

- On May 9, 2012, OSCs Karen Way and Dan Burgo, ERRS personnel, and a Superfund Technical Assessment and Response Team (START) Site Leader (SL) mobilized to the site .

- All personnel reviewed and signed the Health and Safety Plan (HASP). EPA Health and Safety Officer (HSO) Tony Hornellio visited the site to provide additional guidance on structural and chemical hazards, and appropriate safety precautions.

- A site walk was conducted to identify potential hazards and complicating factors, including structural hazards.

- An office trailer, generator, and skidsteer were mobilized to the site. The generator was connected to the trailer to provide electrical power. Electrical power to the building was disconnected by the utility company in December, 2011.

- On May 10, 2012, removal activities began. Personnel marked unsafe areas, cleared debris and hazards from walkways and work areas, and installed string lighting throughout the building. A staging area was cleared and leveled in the rear of the building. The START SL conducted pH readings of vat and container contents as necessary.

- Also on May 10, natural gas lines to the building were disconnected at the street junctions by the utility company.

- On May 11, 2012, an ERRS chemist was on-site to lab-pack small containers and materials found in the building.

- On May 16, 2012, ERRS personnel transferred the contents of a drum on the second floor into a new drum, staged on the first floor. Once the contents were transferred, the original drum was removed from the second floor, which is not structurally safe. The second floor was cleared of other potentially hazardous materials and was cordoned off to discourage entry.

- On May 17 and 21, 2012, ERRS chemists were on site to conduct a more inclusive inventory and collect samples from drums and vats. Additional drums, vats, and containers were found and assigned identifying numbers. Samples were analyzed for pH and RCRA 8 Metals. A selection of samples were also analyzed for cyanide. Drums were relocated in a staging area to await disposal.

- On May 30, 2012, ERRS personnel set up a containment berm for storage of the totes containing corrosive materials while awaiting disposal.

- On June 1, 2012, ERRS personnel began pumping vat contents into large totes for disposal.

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

EPA obtained written property access from the operator of the Hilton Chrome Corporation, Richard Hilton, and from the property owner, RKM Realty Trust. Access was also obtained from the neighboring property owner, Spicket Realty Trust, operated by Richard Young.

2.1.4 Progress Metrics



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

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

- Continue pumping vat contents into disposal totes.
- Arrange transport and disposal of drums and totes.
- Decommission vats and other containers to prevent reuse or rainwater collection.

2.2.1.2 Next Steps

Pump vat contents into totes, and store totes in the designated staging area.

2.2.2 Issues

No known 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

2.5.1 Safety Officer

N/A

2.5.2 Liaison Officer

N/A

2.5.3 Information Officer

N/A

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

Mass DEP
Lawrence Fire Department

4. Personnel On Site

1 EPA OSC
1 START SL
5 ERRS personnel

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.