

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Creese and Cook Co. (Former) 2 Superfund Site - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region I

**Subject:** POLREP #1  
Initial POLREP - Mobilization  
Creese and Cook Co. (Former) 2 Superfund Site  
01HM  
Danvers, MA  
Latitude: 42.5535545 Longitude: -70.9264255

**To:**  
**From:** Ted Bazenias, OSC  
**Date:** 5/1/2012  
**Reporting Period:** 4/24/12 thru 05/01/12

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	01HM	<b>Contract Number:</b>	EP-W-08-61
<b>D.O. Number:</b>	0040	<b>Action Memo Date:</b>	3/8/2012
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	4/24/2012	<b>Start Date:</b>	4/24/2012
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	MAN000105956	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Time Critical Removal Action

#### 1.1.2 Site Description

The Creese and Cook (Former) 2 Site [CC2] is a privately owned parcel covering 3.45 acres which is located at 33 Water Street in Danvers, Essex County, Massachusetts. The property is currently occupied by 28 condominium units. Each condominium unit is individually owned, but contributes fees to and operates under a condominium association, the Crane River East Condominiums.

Starting in 1903, the Creese & Cook Company operated a tannery and leather finishing facility at 33 Water Street. Tannery operations are known to have been conducted at the property until at least 1914, based on historical reports. It is unclear from available documentation what tannery operations continued at the property beyond 1914.

From 1986 to 1987, the 33 Water Street property was redeveloped as the 28-unit Crane River East Condominiums. Only one limited site investigation, conducted in 1984, was found in available documentation regarding this property.

##### 1.1.2.1 Location

The property is bordered to the west by wetlands, the Crane River, and a former Boston & Maine railroad line (MBTA ROW); to the north by Cheever Street, commercial properties, and private residences; to the east by Water Street (Route 35) and commercial properties; and to the south by residential units and the Crane River.

##### 1.1.2.2 Description of Threat

As a result of historical leather tanning operations at the Site, the surface soils are contaminated with arsenic at levels up to 1370 ppm, which exceeds the Massachusetts Department of Environmental Protection Imminent Hazard level of 40ppm for arsenic in surface soils. Contaminated surface soils are located adjacent to six of the condominium units, collectively located in Building "D". Access to the surface soils is unrestricted, creating a potential exposure threat to the occupants of the condos.

##### 1.1.2.3 Removal Assessment/Removal Site Inspection Results

On October 17, 2011, the EPA On-Scene Coordinator (OSC) and contractor personnel mobilized to the Site to conduct a Removal Program Preliminary Assessment/Site Investigation (PA/SI). Personnel collected 50 surface soil samples on a grid system that was established throughout the condominium property. Samples were collected at a depth of zero to twelve inches below ground surface and were subsequently transported to the EPA Regional Laboratory in Chelmsford, MA.

At the laboratory, the samples were first screened by x-ray fluorescence (XRF) for the presence of the metals chromium (Cr) and arsenic (As), two contaminants known to be present at the property from previous investigations. Samples that exceeded 120 parts per million (ppm) by XRF of total chromium were re-directed to a private laboratory for additional analysis to differentiate between the two forms of chromium present, hexavalent chromium (Cr+6) and trivalent chromium (Cr+3). Final results did not identify Cr+6 in any samples that exceeded 200 ppm, the Imminent Hazard threshold for Cr+6 established by the Massachusetts Department of Environmental Protection (MassDEP) in the Massachusetts Contingency Plan (MCP) for determination of a possible threat to public health based on direct exposure to surface soils.

The XRF results indicated that arsenic is present in surface soil samples in certain areas of the property at levels up to 1370 ppm which exceeds the Imminent Hazard threshold of 40 ppm established by the MCP for determination of a possible threat to public health based on direct exposure to surface soils.

After evaluation of the sample analysis results, the EPA OSC prepared a Closure Memorandum to document the decision that a removal action was warranted to protect public health and the environment. An Action Memorandum documenting the Site conditions and approval of a proposed removal action was signed on March 08, 2012.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

In February of 2012, prior to initiation of the EPA Removal Action, the MassDEP installed a temporary fence to restrict public access to the contaminated surface soil between Building D and the north boundary of the property. The fencing will remain in place until the EPA Removal Action is completed. Also in February of 2012, another fence was installed by the MBTA along the western property line of the Site to restrict public access to contaminated soil on property owned and managed by the MBTA. The MassDEP is working with MBTA to further manage the contaminated soil.

#### 2.1.2 Response Actions to Date

On April 24, 2012, the EPA On-Scene Coordinator (OSC) and EPA contractors mobilized to the Site to initiate the removal action. Planned activities under the Action Memo include:

- conduct a site walk with the cleanup contractor;
- conduct additional sampling as needed to further characterize the extent of contamination in the surface soils;
- clear vegetation and obstacles as needed;
- excavate and dispose of contaminated surface soil
- dispose of hazardous substances at EPA-approved off-site disposal facilities;
- repair of response-related damages.

On April 24, 2012, the site walk with the cleanup contractor and additional soil sample collection were performed.

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

Although liable under CERCLA as current owners, EPA has decided, at its discretion, not to pursue the condominium association or individual unit owners for costs associated with cleanup under this removal action. EPA will consider cost recovery from other identified owners and operators of Creese and Cook if they are determined to be legally and financially viable.

#### 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

Excavation of contaminated soil will begin on May 02, 2012, starting with areas abutting Building D, beneath the decks and patios and progressing onto the lawn.

#### 2.2.1.1 Planned Response Activities

It is expected that excavation should be completed within three weeks. Samples of excavated soil will be collected and analyzed for disposal purposes.

### **2.2.1.2 Next Steps**

The schedule for transportation and disposal of contaminated soils has not been determined at this time and is dependent on the results the disposal analysis, availability of transportation resources, and disposal facility capacity. However, disposal is expected to be completed before June 31st.

### **2.2.2 Issues**

Numerous buried utility lines in the proposed excavation area may hinder progress.

## **2.3 Logistics Section**

Communication and coordination with the residents and the Town of Danvers has been exemplary to date.

## **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**

US EPA - Region 01  
MassDEP

### **3.2 Cooperating Agencies**

Town of Danvers, MA

## **4. Personnel On Site**

WESTON SOLUTIONS/ START (1)  
ER LLC (5)  
US EPA (1)

## **5. Definition of Terms**

No information available at this time.

## **6. Additional sources of information**

### **6.1 Internet location of additional information/report**

### **6.2 Reporting Schedule**

POLREPS/SITREPS will be released weekly on Mondays or Tuesdays.

## **7. Situational Reference Materials**

No information available at this time.