

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: POLREP #5
Walton & Lonsbury Site
01GM
Attleboro, MA
Latitude: 41.9577030 Longitude: -71.2970960

To: Curt Spalding, Regional Administrator, EPA Region 1 - New England
Deborah Szaro, US EPA Region 1
Mayor Kevin J. Dumas, City of Attleboro
James Owens, OSRR Director, EPA R1
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Mille Garcia-Serrano, Deputy Director SE Region, MassDEP
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From: Elise Jakabhazy, On-Scene Coordinator
Elsbeth Hearn, On-Scene Coordinator

Date: 5/9/2012

Reporting Period: 11/18/2011 - 05/09/2012

1. Introduction

1.1 Background

Site Number:	01GM	Contract Number:	EP-W-08-062 Task Order 20
D.O. Number:		Action Memo Date:	9/8/2012
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) contractors - 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 (daily water treatment continued until freezing conditions occurred in December 2011 at which time the water treatment system went into stand-by mode); constructing of berm on western side of Bliss Brook Bypass system and construction of the eastern bank of the future Bliss Brook; placing clean fill in the area adjacent to the proposed engineered cap to consolidate the soil to prevent excessive settling after cap installation; removing of large debris and root-mass from the area of the proposed soil stabilization work to aid soil stabilization activities; transporting root mass and other debris from Eastern Operations Division to Western Operations Division; transferring swamp mats to Western Operations Division; beginning wetland restoration behind industrial area; collecting survey points for the construction of drainage, soil stabilization work, and construction of engineered cap; conducting bid-walks and facilitation of bid process for soil stabilization sub-contractor; beginning construction of the retaining walls and drainage behind properties on Paulette Lane that will tie the engineered cap into existing structures; mobilizing the soil mixing subcontractor to begin soil stabilization field test activities on 05/10/2012.

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 Spring and Summer 2012; overseeing survey subcontractors installing property boundary markers; assisting with the HRS package activities for the NPL process; collecting survey and GPS points for the Weston Solutions engineering designs; overseeing the installation of START drilling subcontractors at 8 well couplets and piezometer locations; sampling and purging the well locations after installation; and documenting all Site activities.

2.1.2 Response Actions to Date

See above.

Note that the Site was shut down due to freezing conditions between January 20, 2012 and February 27, 2012.

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	Solids	15 trailer dump trucks with a	008234434JJK, 008234433JJK,	None	Envirite of Pennsylvania,

waste, solid, n.o.s., (cyanide, chromium), 9, PGIII, (D007, F008), ERG #171		total of 342 tons of material	008234431JJK, 008234432JJK, 008234430JJK, 008234397JJK, 008234396JJK, 008234395JJK, 008234380JJK, 008234381JJK, 008234436JJK, 008234437JJK, 008234435JJK, 008234383JJK, 008234382JJK		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

- Work with the Remedial Program and the MassDEP as they move through the NPL listing process;
- Excavate contaminated soil beneath former building footprint and in the wetland behind the facility;
- Complete the design and 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;
- Restore the residential properties according to local, state, and federal requirements;
- Work with the City of Attleboro to fix the drainage issues on Paulette Lane and Deanville Road and;
- Complete the restoration of the clean wetland and upland area behind the 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 design and implementation of in-situ treatment of contaminated groundwater and soil in conjunction with EPA's ERT and EPA's engineering consultants;
- Excavate and dispose of or consolidate and cap contaminated soils in residential areas;
- 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 have been finalized and due to the complex subsurface situation (a thick layer of structurally weak, organic peat), soil stabilization will be performed in this area to create a suitable foundation for the engineered cap and drainage improvements. This work is planned to begin in May 2012.

Due to construction-related noise and nuisance, relocation services for families in the residential area continue to be available to 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. 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. 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.

After the discovery of the contamination in the wetlands south of the facility, the EPA Emergency Response and Removal Program has begun working with the EPA Site Investigation Program during their Hazardous Ranking System (HRS) Evaluation process. To date, the Site has preliminarily ranked as a potential National Priorities List (NPL) Site and a public meeting was held on April 30, 2012 to initiate the public participation in the NPL process.

2.3 Logistics Section

Personnel:

- EPA will maintain a Site presence with one or two Federal On-Scene Coordinators, depending on workload and schedule.
- EPA will occasionally 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 Equipment Operators, 1 truck driver/laborer, and 1 chemical technician).
- START personnel level of effort will remain at one.

Equipment & Supplies:

- Two swamp dumptrucks - used to transport clean fill during cap construction (these were demobilized in April & one was mobilized back at the beginning of May).
- Three excavators - for use during excavation, cap construction and T&D load-out activities (one was demobilized in April).
- One dump truck - for transporting material on public road between eastern and western division (demobilized in April).
- 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

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$8,130,171.00	\$4,468,943.00	\$3,661,228.00	45.03%
Contracted Engineering Services	\$686,075.00	\$330,000.00	\$356,075.00	51.90%
START	\$1,330,776.00	\$779,074.00	\$551,702.00	41.46%
REAC	\$120,000.00	\$0.00	\$120,000.00	100.00%
CLP	\$35,000.00	\$0.00	\$35,000.00	100.00%
Extramural Contingency	\$2,053,287.00	\$0.00	\$2,053,287.00	100.00%
Intramural Costs				
Total Site Costs	\$12,355,309.00	\$5,578,017.00	\$6,777,292.00	54.85%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

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 liaison 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, two "fact sheet" updates have been distributed local residents to provide additional information about the Site. One of these was prior to the winter shut down and one was prior to the NPL Public Meeting. The NPL-Process Public Meeting was held on April 30, 2012 at the Attleboro City hall. A public information session was held prior to the meeting to answer questions concerning the sampling events that the Pre-Remedial program had performed.

Since the Public meeting describing the NPL Process, numerous film and newspaper reporters have contacted the OSCs and EPA Public Affairs Office. Concerned citizens call or stop by the Command Post on a daily basis. The OSCs are continually interacting with the public.

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

Two - Thirteen (2-13) ERRS Personnel [GES" Guardian Environmental Services (with Shaw Group, subcontractors to GES, and various other subcontractors including Envirocon)]

5. Definition of Terms

EPA = U.S. Environmental Protection Agency

MassDEP = Massachusetts Department of Environmental Protection

MA DPH = Massachusetts Department of Public Health

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 late July.

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.

POLREP #5 Last Updated 1/15/2013