U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Former Lawrence Metals - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: **POLREP #2**
Progress
Former Lawrence Metals
01KM
Chelsea, MA
Latitude: 42.3993120 Longitude: -71.0391970

To:
From: Athanasios Hatzopoulos, OSC
Date: 8/8/2013
Reporting Period: 6/12/13 to 8/2/13

1. Introduction

1.1 Background

Site Number:	01KM	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	5/14/2013
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/11/2013	**Start Date:**	6/11/2013
Demob Date:		**Completion Date:**	
CERCLIS ID:	MAN000106127	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category
Time critical.

1.1.2 Site Description

The Site is approximately 1.8 acres. It is currently vacant and secured with a chain link fence. The northern portion of the Site is unpaved and overgrown with dense vegetation. The southern portion of the Site is predominantly covered with asphalt and portions of concrete floor slabs. The southern portion of the Site also includes three (3) areas (approximately 1,200 square feet) that are unpaved and covered with gravel. A limited soil removal performed under the MCP as a Release Abatement Measure (RAM) took place from 2001 to 2002 performed by Maximillian Technologies, Inc., on behalf of the Lawrence Metal Forming Corp., to address the elevated concentrations of PCBs and lead detected in shallow soils.

There are several occupied buildings and institutions located in the vicinity of the Site. A hotel is located directly across Beech Street, and the Chelsea High School and a community swimming pool directly to north of the Site on Carter Street. The school's student and teacher body consists of 1,581 persons. Beech Street and Carter Street are two of the three major routes walked daily by students and others attending the High School or using the community pool.

The nearest surface water body is the Chelsea River located approximately 1.2 miles to the east.

According to the EPA Region 1 Environmental Justice Screening Tool, the Site exceeds 80% of the national indices for 7 out of 10 parameters and 45,014 people live within one mile radius.
Historically, the Site has been utilized for various commercial and industrial uses since the late 19th century. Earliest records indicate the Site was first occupied by Chadbourne & Mocre, Inc. and the Bridgeport Coach Lace Company, which used the Site for the production of textiles. The American Barrel Company (ABC) began operating on the Site in 1938 and utilized the Site for painting and cleaning of barrels and drums for reuse. The ABC operations continued until May 1974, when a fire destroyed the ABC building. Following the destruction of the former ABC building, the Site was vacant until 1979.

In June 1979, the Site was redeveloped by the Superior Distributing Company (Superior). After purchasing the parcel of land, Superior constructed a large rectangular building in the southern portion of the Site along Beech Street. Superior occupied the building, which it used as a warehouse, until 1986 when the Site was purchased by the Massachusetts Institute of Technology (MIT).

MIT completed minor modifications to the Superior building before the Lawrence Metals

Forming Company (LMFC) took ownership and began operating on the Site from 1986 until 1999. The LMFC operations included manufacturing and custom fabrication of various metal products. The City of Chelsea Economic Development Board under an Urban Renewal Plan acquired the parcel of land (excluding the MassDOT-owned portion of the former Maple Street remnant) through an order of taking in 1999, and in December 2000 demolished the LMFC building (formerly Superior building) leaving only the foundation and floor slab.

1.1.2.1 Location
The Site is located at 145-155 Beech Street in Chelsea, MA and is identified in the Chelsea Assessor's Office on Map 55, Lots 17A and 17B and also includes remnants of the former Maple Street to the south (see Figure 1). It is abutted by Carter Street and Chelsea High School and the Vietnam Veteran's Pool to the north, U.S. Route 1 to the east and Beech Street and a new hotel development to the west.

1.1.2.2 Description of Threat
PCBs and lead were detected in soil samples at the Site. PCBs and lead are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. 9601(14). The PCB concentrations present at the Site exceed the default cleanup standards considered protective of public health including: EPA's PCB Cleanup and Disposal Regulations, 40 CFR Section 761.61, (1 mg/kg for unrestricted use, and 10 to 100 mg/kg with a compliant cap); the preliminary remediation goals (1 mg/kg for residential areas, 10 to 25 mg/kg for industrial use) specified in EPA OSWER Directive 9355.4-01; and the MCP Method 1 default standard of 2 mg/kg for both residential and industrial soils.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results
The highest concentrations for both hazardous substances detected are compared to the remediation standards identified in the Massachusetts Contingency Plan (MCP) as follows:

Hazardous Substance	Highest Concentrations Detected	MCP Soil Remediation Standards
		S-1 (high frequency/intensity use area)
Lead	17,300 mg/kg	300 mg/kg
PCBs	208,000 mg/kg	2 mg/kg

2. Current Activities

2.1 Operations Section

2.1.1 Narrative
On May 14, 2013, an Action Memorandum to conduct the Removal Action was signed by the Office Director of the Office of Site Remediation and Restoration. .

2.1.2 Response Actions to Date
On June 11, 2013, Emergency Rapid Response Services (ERRS), MassDEP, and Superfund Technical Assessment and Response Team (START) conducted a Site walk and initiated the Removal Action.

On June 19, 2013, a meeting was held at the Marriott Residence Inn located across the street from the site. In attendance were the OSC, ERRS, MassDEP, MassDOT, and representatives from the City of Chelsea, the city's contractors, Weston & Sampson, the hotel development firm, and the hotel firm's contractors. The topics discussed included site access, planned future development, planning, concerns with the school located to the north, and traffic congestion.

For the duration of removal activities, DustTrak particulate monitors will be used to conduct perimeter air monitoring.

All soil that is excavated and staged will be covered with polyethylene throughout the duration of the removal action.

6/17/13 to 6/21/13

The following activities were conducted:

- Mobilizing equipment, supplies, and personnel.
- Clearing and chipping of vegetation, brush, and trees.
- Repairing the perimeter fence.
- Collecting scrap metals and debris from throughout the site.

6/24/13 to 6/28/13

The following activities were conducted:

- Mobilizing equipment and supplies, including office trailers.
- Clearing and chipping of vegetation, brush, and trees.
- Repairing the perimeter fence, and installing a fabric screen along the fence.
- Conducting test pit excavation activities to obtain aliquots of soil for composite disposal samples from 0-3 feet.
- Conducting perimeter particulate air monitoring using DustTrak particulate meters.

Results from the DustTrak monitors during this period have shown that they are below the OSHA PEL for particulates as outlined in the site HASP.

7/1/13 to 7/12/13

The following activities were conducted:

- Continuing test pit excavation activities to obtain aliquots of soil for composite disposal samples from 0-1 and 1-3 feet.
- Conducting perimeter particulate air monitoring using DustTrak particulate meters.

On July 2, 2013, a press event was held at the site.

Results from the DustTrak monitors during this period have shown that they are below the OSHA PEL for particulates as outlined in the site HASP.
Representatives from MassDEP and the City of Chelsea contractor visited the site to observe progress.
On July 12, 2013, a UST was discovered during disposal sample test pit excavation.

7/15/13 to 7/19/13

The following activities were conducted:

- Continuing test pit excavation activities to obtain aliquots of soil for composite disposal samples from 0-1 and 1-3 feet.
- Installing a silt fence along the perimeter of the site to minimize soil migration from spray water (dust suppression).

Results from the DustTrak monitors during this period have shown that they are below the OSHA PEL for particulates as outlined in the site HASP.
On July 17, 2013, personnel identified another possible UST in the proposed excavation area. A metal detector was used to identify the location of the tank. Both aforementioned tanks will be removed as the excavation progresses into the tank area.

7/22/13 to 7/25/13

The following activities were conducted:

- Preparing a staging area for excavated soils.
- Preparing a roadway and turnaround area for disposal trucks.
- Installing a silt fence along the perimeter of the site to minimize soil migration from spray water (dust suppression).
- Excavating contaminated soils from the southern end of the site, and staging the soil in the prepared area.

Results from the DustTrak monitors during this period have shown that they are below the OSHA PEL for particulates as outlined in the site HASP.

7/29/13 to 8/2/13

The following activities were conducted:

- Collecting perimeter and personal air samples for lead and PCB analysis.
- Excavating contaminated soils from the southern end of the site, and staging the soil in the prepared area.
- Loading trucks with contaminated soil, for transportation to the disposal facility.

Results from the DustTrak monitors during this period have shown that they are below the OSHA PEL for particulates as outlined in the site HASP.
Representatives from MassDEP and the City of Chelsea contractor visited the site to observe progress.
Contaminated soil was sent to Wayne Disposal, Inc. in Belleville, Michigan for disposal.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities

The OSC will coordinate with the EPA's Office of Public Affairs Community Involvement staff to continue to disseminate information regarding the project to the City and the impacted residents. A public meeting to discuss the removal action is planned to be held on June 17, 201,3 at the City of Chelsea High School.

2.2.1.1 Planned Response Activities

Conduct air monitoring and implement dust control measures as appropriate during the Removal Action;

Clear vegetation as needed;

Provide non-working hour site security and maintain security fencing as determined necessary by the OSC;

Excavate and dispose off-site soils with PCB concentrations greater than (>) 1 mg/kg to a depth of one foot

below ground surface across the entire Site. Additional contaminated areas, which may continue to act as a source material, will be excavated at depth, at the discretion of the EPA OSC;

Excavate and dispose off-site soils with PCB concentrations greater than or equal to (≥) 50 mg/kg at any location in the northern portion of the Site, and excavate and dispose off-site, soils located in the southern portion of the Site to achieve an average PCB concentration of less than or equal to (≤) 100 mg/kg. The soils or waste streams will be an amalgam of soil/pavement/concrete pads/rock, etc.;

Stabilize soil, as required for TCLP lead. At this time, soil sampling has revealed that portions of the soil to be excavated have exceeded the TCLP lead standard. As a result on-site treatment of soil is necessary to reduce the leachable lead to a level that allows material to be cost effectively transported and disposed of in a land disposal facility;

Installation of a visual marker to delineate contaminated soils (if any) which may remain at depth or which cannot otherwise be excavated. At the discretion of the OSC, backfill and restore disturbed areas and repair response-related damages;

Restoration/Backfilling will be conducted by the developer;

Demobilize all personnel and equipment from the Site and leave existing security fence in-place

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

2.5.1 Safety Officer

2.5.2 Liaison Officer

2.5.3 Information Officer

Emily Zimmerman

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

USEPA
MassDEP

4. Personnel On Site

No information available at this time.

5. Definition of Terms

ERRS- Emergency Rapid Response Services
EPA/USEPA - U.S. Environmental Protection Agency
MassDEP - Massachusetts Department of Environmental Protection
NERL - Office of Evironmental Measurement and Evaluation
OSC - On-Scene Coordinator
PA/SI - Preliminary Assessment/Site Investigation
RM - Response Manager
START - Superfund Technical Assessment and Response Team
T&D - Transportation and Disposal
PCBs - Polychlorinated biphenyls
TSCA - Toxics Substances Control Act
MCP - Massachussets Contingency Plan
CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.