

United States Environmental Protection Agency
Region I
POLLUTION REPORT

Date: Wednesday, June 1, 2005

From: Randy Rice

Subject: Initiation of Action

Bay State Plating and Polishing, Inc.

300 Canal Street, Lawrence, MA

Latitude: 42.7058000

Longitude: -71.1589000

POLREP No.:	1	Site #:	01CP
Reporting Period:	5/26 - 6/1/2005	D.O. #:	
Start Date:	5/26/2005	Response Authority:	CERCLA
Mob Date:	5/31/2005	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	MAN000104180	Contract #	68-W-03-037
RCRIS ID #:			

Site Description

The Site, owned by Pacific Mills Acquisition, LLC, is located on the third floor of Building 6 at 300 Canal Street in Lawrence, Massachusetts. Its geographic coordinates are 42E 42N 23.1" north latitude and 71E 9N 30.4" west longitude.

There are an estimated 60 business tenants within the surrounding former mill, which is known locally as the "Pacific Mills Industrial Complex". The City of Lawrence has a population of 72,000; the Site is located within the central business district, within fifty feet of a canal.

The Site is on the third floor of a five-story building, with neighboring active businesses above, below and beside its poorly constructed partition walls.

The Bay State Plating and Polishing Company, Inc. operated as a tenant at 300 Canal Street from 1997 to July 2004, when the company was evicted for non-payment of rent. The assets of the operator were seized by the Essex County Sheriff's Department; assets include the contents of the plating room and finishing room. On 27 July 2004, MADEP and a contractor retained by the owner performed a site survey, including a partial inventory of materials stored. In January 2005, the OSC was contacted by the property owner's attorney, who described the situation. EPA then initiated a PA/SI to evaluate the non-oil release at this inactive metal plating and finishing facility.

According to the EPA Region 1 Environmental Justice Mapping Tool, the Site is in a low income and minority environmental justice area.

Current Activities

May 26, 2005 - OSC Stanton conducted a site tour with Shaw (ERRS contractor) and Weston (START contractor) personnel to assess layout of the Site, and determine appropriate equipment, personnel, and utilities needed. START developed a health and safety plan.

May 31, 2005 - OSC's Lussier and Stanton and Shaw and Weston personnel mobilized. Shaw delineated the work zone and the decontamination area and constructed engineering controls to minimize impacts of cleanup on nearby tenants through migration of vapors, liquids or debris. OSC's Lussier and Stanton met with tenants of the building to discuss the pending removal action.

June 1, 2005 - Shaw completed the installation of polyethylene sheeting over the vats and started the installation of sheeting on the adjoining wall of an adjacent business. Shaw staged all empty containers near an exit door in the plating room. Shaw gathered all small containers and staged them in the plating area.

Planned Removal Actions

1. Conduct a site tour with contractor personnel to assess layout of the Site, and determine appropriate equipment, personnel, and utilities needed;
2. Develop and implement a health and safety plan;

3. Prepare an air monitoring plan, assuring protection of cleanup workers and nearby building tenants;
4. Provide site security sufficient to eliminate unauthorized access to the Site building areas;
5. Mobilize personnel and equipment;
6. Delineate work zones and decontamination area;
7. Construct engineering controls to minimize impacts of cleanup on nearby tenants through migration of vapors, liquids or debris;
8. Perform air monitoring as required;
9. Plan proper sampling, identification, and characterization of hazardous materials;
10. Perform consolidation, appropriate segregation and staging, and off site disposal of materials at an EPA approved disposal facility in accordance with the EPA Off-Site Rule, 58 F.R. 49200, effective October 22, 1993. Coordinate disposal of all hazardous materials in accordance with federal, state, and local regulations;
11. Decontaminate and dispose of all RCRA-empty drums, vats, and small containers;
12. Assess and characterize any additional hazardous materials discovered during the course of this action;
13. Clean areas of contamination found on building surfaces including plating floor liner, floors, ceilings, and walls; and
14. Perform any necessary Site restoration, and demobilize.

Next Steps

1. Sample vats.
2. Transfer liquids from the vats to drums.
3. Dispose of empty containers.

Key Issues

The Site's location in a heavily used industrial mill complex, along with its situation on the third floor of a five-story building with businesses above, below and beside its poorly built partition walls, could immediately threaten other workers and passersby from a release of hazardous substances. Other tenants in the building pass the Site area regularly during their daily business. The facility does not have security to deter vandals or trespassers from breaking into the building and risking exposure to the highly concentrated, toxic and corrosive chemicals. The mill complex is located near city and county government offices, the Lawrence central business district, public schools, senior citizen housing, and city parks.

[response.epa.gov/BayStatePlating](https://www.epa.gov/response/BayStatePlating)