

United States Environmental Protection Agency
Region I
POLLUTION REPORT

Date: Saturday, June 18, 2005

From: Randy Rice

Subject: Second Polrep

Bay State Plating and Polishing, Inc.
300 Canal Street, Lawrence, MA
Latitude: 42.7058000
Longitude: -71.1589000

POLREP No.:	2	Site #:	01CP
Reporting Period:	6/6 - 6/17/2005	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.

Current Activities

Week of 6 June 2005:

ERRS completed the staging of all small containers in the plating room. Shaw transportation and disposal (T&D) coordinator Barry Taggart collected samples from the drums and vats and began the disposal process. Samples were sent to a lab for analysis.

A vat cutting area was established on the driveway adjacent to the building.

ERRS personnel continued with the pumping of vat liquids into poly drums, and began transporting the cleaned empty vats and the full drums outside to the cutting area. A 30-yard roll off container and a 40-foot storage box were delivered and staged on the driveway alongside the building. ERRS personnel used a cut-off saw to cut the vats and debris into three-foot sections.

A bob-cat was delivered to facilitate the movement of the drums and vats.

A second 30-yard roll off container was delivered on 10 June, to house additional vat pieces and used PPE.

Approximately 20 yards of process gravel fill was delivered to smooth out the driveway area where the two roll-off containers and the storage box were placed.

Approximately 33 vats have been emptied and/or cut, yielding 135 full drums to date. 57 of these (caustic, pH >5) are stored in the storage box.

Two MonoTox cyanide monitors, supplied by Shaw Environmental, were placed in locations adjacent to

and above the plating room, and monitored every hour during site activities by START Mahany.

Paul Giddings, Massachusetts Department of Environmental Protection (MADEP) emergency responder, provided coverage for OSC Lussier for June 10.

Week of 13 June 2005:

ERRS personnel continued with the pumping of liquids from the vats and the cutting activities.

Paul Giddings, MADEP, provided coverage for OSC Lussier on June 13 and 14.

The two roll-off containers were filled with hazardous debris consisting of cut up vats and metal from the plating room, floor sweepings and PPE. A third roll-container was delivered and placed on the driveway alongside the building.

T&D coordinator Taggart was on site to arrange for the disposal of the drums, small containers and debris.

ERRS personnel set up the CRZ for the polishing room and started removing the lead and cyanide contaminated debris and dust. Dust was vacuumed using a HEPA vacuum and the debris was placed into plastic bags.

Due to the immense size of a steel vat in the plating area (10'L x 4' H x 4'W and weighing one ton), it will be cleaned and will remain in the room.

Only debris that is considered to be contaminated will be removed from the both rooms and disposed.

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

Complete the removal of vats and debris from the plating room. Sweep and vacuum floor. Remove poly sheeting from walls.

Dispose of roll-off containers.

Obtain another storage box and stage drums in it.

Continue with the clean up of the polishing room.
Arrange for disposal.

Continue with air monitoring activities.

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.

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