U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Lewis Chemical - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: **POLREP #4**
Progress
Lewis Chemical
01NE
Hyde Park, MA
Latitude: 42.2528593 Longitude: -71.1197482

To:
From: Athanasios Hatzopoulos, OSC
Date: 7/13/2023
Reporting Period: 6/26/2023 to 7/14/2023

1. Introduction

1.1 Background

Site Number:	01NE	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	1/26/2023
Response Authority:		**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	4/4/2023	**Start Date:**	3/16/2023
Demob Date:		**Completion Date:**	
CERCLIS ID:	MAD053455911	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category
Time critical removal action.

1.1.2 Site Description

The Site is approximately a one-acre vacant lot that is contaminated with polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs), and metals. It is located in a mixed commercial residential neighborhood in Hyde Park, Massachusetts, and comprised of three parcels. Two are owned by the City of Boston (city) and the third owned by the Commonwealth of Massachusetts and managed by the Massachusetts Department of Conservation and Recreation (DCR) as environmental preservation land. Approximately 20,858 people reside within one mile of the Site. Also, within one-mile radius there are 15 schools, three nursing homes and six childcare centers. It is adjacent to the Neponset river and based on information in EPA' s EJSCREEN environmental justice screening tool, 11 of 12 Environmental Justice Indexes for the area within a one-mile radius of the site exceed the 80th percentile on a state basis and 5 of 12 exceed the 80th percentile on a national basis.

On June 21, 2022, and November 9, 2022, MassDEP and city respectively requested EPA's assistance to address hazardous substances existing at the Site. In October 2022, EPA initiated a Preliminary Assessment/Site Investigation and confirmed that the contaminants in Site soils pose a risk to public health and the environment.

1.1.2.1 Location
The Site is located at Fairmount Court and at 12-24 Fairmount Court . The city acquired Fairmount Court in 1990 through a tax foreclosure and in 2001 became owner of 12-24 Fairmount Court, the larger of the two parcels and the location of former industrial facilities, also through a tax foreclosure. The square footage of the two parcels is approximately 30,120 square feet. The Commonwealth owns the third parcel comprising the Site which is approximately 8,500 square feet, running along the Neponset River. The entire Site abuts the Neponset River to the south, with approximately 580 feet of frontage.
The elevated Fairmount Massachusetts Bay Transportation Authority (MBTA) train station and railroad tracks are adjacent and located to the north and northwest of the Site with approximately 520 feet of common boundary. Fairmount Court dead ends at the northeast entrance of the Site. The Site is located at latitude 42° 15' 10.368" N, and longitude 71° 07' 11.136" W.

1.1.2.2 Description of Threat
The primary hazardous substances at the Site include, but are not limited to PCBs, VOCs and metals. These are "hazardous substances" as defined by Section 101(14) of CERCLA and 40 CFR § 302.4. In October 2022, EPA initiated a Preliminary Assessment/Site Investigation (PA/SI) to evaluate if the hazardous substances in Site soils pose a risk to public health or the environment. Sampling data indicate the presence of elevated levels of PCBs, VOCs, and metals in soils. The Site soils are exposed to weathering and are likely migrating to the Neponset River. Access to the Site is largely unrestricted. Human exposures to these contaminants present a potential health threat.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results
Historically the city and DCR have performed soil sampling activities at the Site. Soil data collected by DCR shows that PCBs were detected in 373 of 540 soil samples collected between June 2020 and March

2021 as part of investigations to characterize the extent of PCBs in soil. Concentrations of PCBs in 234 of the 373 soil samples where PCBs were detected contained concentrations above the Massachusetts Contingency Plan (MCP) Method 1, S-1 Standard of 1 mg/kg, and 87 of 373 samples contained PCBs at 50 mg/kg or above. Based on samples collected by the City of Boston, the soil on the city-owned parcels is contaminated with PCBs at levels consistent with Commonwealth-owned parcel. Additionally, both data sets reveal that soil areas where PCBs have been detected are also contaminated with elevated levels of volatile organic compounds (VOCs) and metals. The levels of PCBs, VOCs, and metals are also exceed EPA's Removal Management Levels1 (RMLs). The results of the sampling data can be found in the document section of this website.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

A time-critical removal action (RA) was recommended in the Site Investigation Closure Memorandum dated December 21, 2022. An Action Memorandum was prepared and signed by the SEMD Director on January 26, 2023. The results of the sampling data can be found in the Lewis Chemical Site file.

2.1.2 Response Actions to Date

For information on prior response actions performed, please refer to POLREP #3.

Weeks of June 26, July 3, and July 10 2023
The following tasks were performed:

Continued excavation work at the furthest end of the Site (the south west end between the Neponset River and MBTA train tracks). The area being excavated is made up of buried leather-like manufacturing wastes (leather scraps, etc.), soil, and other building demolition debris. Laboratory analysis of samples show that this material is contaminated with soils that contains PCBs less than 50 mg/kg.

As of July 14, approximately 1,500 cubic yards have been excavated and staged at the northeast corner of the Site for disposal. The excavated wastes are secured with reinforced polyethylene cover during non-working hours. Any metal and other larger concrete building debris unearthed during this process has been washed, segregated, and staged in different areas. The debris will be sampled and if free of contaminants will be recycled or reused on Site.

Continued the use of water as an engineering control to suppress dust while moving/using equipment, throughout all excavation and staging. Approximately 2,500 gallons of water have been sprayed each day.

Continued air monitoring using DustTraks throughout all of the excavation and staging activities, and documenting the on-going removal action activities. No air monitoring exceedances were detected.

During the excavation of the leather material, a concrete structure was found/uncovered on the Site. The visible portion of the structure is situated between the Lewis Chemical property and MBTA . It is not known how far it extends onto the MBTA property. The OSC directed its contractor to stop work in that area and contacted MBTA & Keolis and requested they come to the Site for an inspection. Representatives came to the Site and will come again next week with the MBTA Engineering Director.

Provided updates to the City, MassDEP and DCR of work being performed.

Received and reviewed the Transportation and Disposal (T&D) contractors proposals. Held meeting with potential contractors to discuss type of trucks that will be used used, their carrying volumes, traffic plans and routes that can be used to transport waste off site. At this time the contractor proposals offer smaller trucks that can maneuver from Fairmount Avenue , into Fairmount Court, around the MBTA entrance, and in and out of the Site. The carrying volume of each truck is 17 tons. This limited amount of volume per truck results to higher transportation costs. To lower the transportation cost, the OSC requested ER to rebid the T&D bid to include larger trucks that can carry 28 tons per load. This process of using larger trucks, will require a neighboring property owner to allow the larger trucks to enter his property and maneuver from Fairmount Court, around the MBTA entrance and into the Lewis Chemical Site. The property owner has already granted EPA written access to do so, and a meeting has been set for July 17 to go over the details.

It was agreed by all, that to control truck traffic in and out of the Site, Boston Police will be present at the intersection of Fairmount Court and Fairmount Avenue.

EPA CIC visited the Site. Informational signs have been added to three locations on Site with contact information for those who have questions or concerns throughout this process. Two signs are on Fairmount Avenue (on the fence near each entrance to the Fairmount Station), and one is on the entrance gate of the Site. MassDEP and CDW (Environmental Consultants to DCR) also visited the Site to observe progress.

Due to rodent complaints from properties across the Neponset River, a pest control company has been hired to install traps throughout the Site. Rodents have not been observed/detected during the entirety of the removal action.

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

2.1.4 Progress Metrics

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

2.2 Planning Section

2.2.1 Anticipated Activities

The goal of the RA is to minimize the direct contact threat and remove the source contamination by excavating and disposing of soils contaminated with PCBs and other hazardous substances. The excavated areas will be resampled, delineated with geotechnical fabric, and backfilled with clean soil. After EPA has completed removal and cleanup work, post-removal site controls (such as deed restrictions if necessary) will be implemented by the city or by DCR under MassDEP oversight.

2.2.1.1 Planned Response Activities

- Continue developing and implementing a Community Involvement Plan for the duration of the RA.
- Continue developing/amending the scope of work as the RA progresses.
- Continue Site security as necessary based on conditions.
- Mobilizing additional personnel and equipment.
- Re-delineating work zones and decontamination area as work progresses.
- Continue performing air monitoring and implementing dust control and suppression for worker protection and public health, as needed.
- Continue excavating soil contaminated with PCBs and other collocated contaminants.
- If necessary, treating and disposing surface/ground water accumulated in excavated areas.
- Conducting onsite decontamination of larger debris, and segregating hazard-free debris.
- Administering traffic management plan for the disposal of hazardous wastes and incoming clean soil.
- Conducting post-excavation soil characterization to verify and document conditions that remain
- Providing and placing geotextile fabric and warning barrier across excavation areas.
- Transporting and disposing of contaminated soil at EPA approved disposal facilities. Removing and disposing other hazardous substances discovered during this removal action.
- Backfilling excavated areas and capping the excavated footprint of the Site.
- Repairing response related damages; and
- Demobilizing resources.

2.2.1.2 Next Steps

Next steps include the activities outlined in the previous two sections.

2.2.2 Issues

None at the moment

2.3 Logistics Section

n/a

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$3,080,000.00	$340,000.00	$2,740,000.00	88.96%
START	$185,000.00	$89,000.00	$96,000.00	51.89%
Extramural Contingency 20%	$653,000.00	$0.00	$653,000.00	100.00%
Intramural Costs				
USEPA - Direct	$100,000.00	$45,000.00	$55,000.00	55.00%
Total Site Costs	$4,018,000.00	$474,000.00	$3,544,000.00	88.20%

* 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

No information to report at this time.

2.5.2 Liaison Officer

No information to report at this time.

2.5.3 Information Officer

No information to report at this time.

3. Participating Entities

3.1 Unified Command

n/a

3.2 Cooperating Agencies

MassDEP/DCR
City of Boston

4. Personnel On Site

EPA OSC
START-3 staff
ERRS-6 staff

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.