

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region I

**Subject:** POLREP #10  
Progress  
Lewis Chemical  
01NE  
Hyde Park, MA  
Latitude: 42.2528593 Longitude: -71.1197482

**To:**  
**From:** Athanasios Hatzopoulos, OSC  
**Date:** 4/22/2024  
**Reporting Period:** 1/27/24 to 4/19/24

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	01NE	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	3/27/2024
<b>Response Authority:</b>		<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	4/4/2023	<b>Start Date:</b>	3/16/2023
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	MAD053455911	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 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 80<sup>th</sup> percentile on a state basis and 5 of 12 exceed the 80<sup>th</sup> 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 Levels<sup>1</sup> (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. An Amended Action Memorandum was prepared and signed by the SEMD Director on March 27, 2024. 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 previous POLREPs. The following tasks were performed during this reporting period of January 27, 2024 through April 19, 2024.

#### **January 29 to February 29, 2024**

Continued transportation and disposal of the PCB/VOC contaminated soil that began on January 23, 2024. Loadout for this phase of transportation utilized a total of 25-28 cubic yard roll-off containers to the Heritage Environmental Services landfill (Heritage) located in Roachdale, Indiana. All truck loadout and transportation activities were performed following a traffic plan that was agreed by the City of Boston Police and Fire Departments. To avoid traffic issues and maintain consistency with the traffic plan, all load out activity began at 6 am daily, using the same drivers throughout the entire truck loadout. Trucks were not allowed to leave the Site within a 15-minute window of a train arriving and departing the Fairmount train station. Trucks were also held up until all commuter vehicles had left the parking area in front of the station. Once the roadway was clear, each truck was escorted into the Aspen Consulting yard and up onto Fairmount Ave., where trucks turned onto Truman Parkway and eventually to Route 93. Police details were used to allow unimpeded access of trucks to and from the Site. The remaining contaminated soil was consolidated into one small stockpile in the northeast corner of the foundation pad and secured (covered) with polyethylene sheeting.

From February 2, 2024, to February 15, 2024, continued excavating in the central part of the Site where the concrete pad and foundation had been removed. Excavation was 2 to 4 feet deep depending on how much concrete was removed from the surface, with the goal of 4 feet below the original surface of the concrete. A berm was left on the eastern side of the ponded area to keep water from entering the new excavation area.

Additional large concrete blocks were encountered, as well as bricks and a metal vat/bin. Conducted breaking of the concrete slab foundation and concrete blocks and separating steel rebar. Concrete and bricks were broken up and transported to the concrete stockpile at the east end of the Site. Water was used for dust control during excavation and concrete breaking.

On February 5, 2024, representatives from Boston Water and Sewer Department (BWSD) were on Site to inspect the 6-inch water line and gate valve found in the north central area of the Site. BWSD believed it was on private property, which EPA corrected to indicate that the pipe is in fact on city-owned property. BWSD did not know if it was live or where the shut-off valve was but said they would investigate further and respond.

From February 19, 2024, to February 29, 2024, another round of contaminated soil loadout was conducted through Heritage. All truck loadout and transportation activities were performed following a traffic plan that was agreed by the City of Boston Police and Fire Departments, as described above. A total of 27 trucks were loaded. This concluded this phase of loadout. Remaining contaminated soil was consolidated into one small stockpile in the northeast corner of the foundation pad and secured with polyethylene sheeting.

On February 21, 2024, 10 samples from the broken-up concrete were collected for PCB analysis. The samples were hand delivered and analyzed by the NERL/LSAD. No PCBs were detected.

Excavated a series of test pits to approximately 6 feet to peat layer at discreet areas of the Site. This was done to identify future areas that when excavated may need immediate VOC suppressant foam control.

START laid out a grid (15-foot x 15-foot and 15-foot x 10-foot depending on road width) along the upland road and collected 17 surface soil samples (including one duplicate) for PCB analyses. The samples were hand delivered to NERL/LSAD. Based on these sample results, the road was excavated down approximately 1 foot.

START laid out a grid (approximately 20-foot by 15-foot) in the central excavation area and collected 22 samples (including two duplicates) for VOC, PCB, and metals analyses. The samples were hand delivered to NERL/LSAD.

On February 27, 2024, excavation on the riverbank started. The process entailed removing the chain link fence along the top of the riverbank, removing the armor stone/rip-rap and soil under the stones and leaving one row of the stones above the water line of the river. After excavation was complete, temporary erosion controls and high-visibility fence were installed at the top of the bank.

#### **March 4 to April 19, 2024**

During March and April of 2024, continued excavating and stockpiling contaminated soils in order to meet the MassDEP Standards for Soil Remediation and EPA RMLs. Multiple heavy rainstorms impeded Site work, causing missed workdays and excessive amounts of rainwater ponding in excavation areas, impeding site activities.

On March 27, 2024, an Amended Action Memorandum was issued by EPA which increased project funding and extended the duration of the project.

On April 3, 2024, ERRS collected soil samples from the contaminated soil stockpile for disposal analysis.

On April 12, 2024 ERRS, received acceptance approval for 1,500 tons from Heritage. Final loadout activities would begin on April 25, 2024.

On April 16, 2024, START conducted post-excavation soil characterization by establishing grids along the entire excavated Site area. Samples were screened by the EPA mobile laboratory that was on Site for metals and PCBs. 20% of the samples were selected for confirmatory analysis at NERL/LSAD.

In addition to the above, the following activities were also performed throughout the duration of this timeframe:

Secured the excavated stockpiles wastes with reinforced polyethylene cover during nonworking hours.

Continued perimeter particulate air monitoring using DustTraks throughout excavation and staging activities, and continued VOC monitoring using photoionization detectors (PIDs) on AreaRAEs.

Documented the ongoing removal action activities. Provided periodic updates to the city, MassDEP and DCR of work being performed.

Met on Site with representatives from MassDEP, city and DCR and provided updates. .

Continued monthly inspection of the rodent traps by a hired licensed exterminator with no rodents found.

Recorded and photo documented the removal activities.

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

#### 2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
PCBs	Leather/pleather/soil/debris	1,230 tons		Landfill	Casella USA landfill, Coventry, VT
PCBs/VOCs/lead	Soil debris	2,142 tons		Landfill	Heritage Landfill, Roachdale, Indiana

## 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

### 2.4.1 Narrative

During this period, an additional \$1,000,000 in funding was added via an Amended Action Memorandum; this is reflected in the Budgeted funding levels shown below:

**Estimated Costs \***

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$4,458,000.00	\$2,300,000.00	\$2,158,000.00	48.41%
START	\$460,000.00	\$325,566.00	\$134,434.00	29.22%
<b>Intramural Costs</b>				
USEPA - Direct	\$0.00	\$180,000.00	(\$180,000.00)	0.00%
<b>Total Site Costs</b>	<b>\$4,918,000.00</b>	<b>\$2,805,566.00</b>	<b>\$2,112,434.00</b>	<b>42.95%</b>

\* 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-1 staff

ERRS- 5 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.