

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region I

**Subject:** POLREP #9  
Lewis Chemical  
01NE  
Hyde Park, MA  
Latitude: 42.2528593 Longitude: -71.1197482

**To:**  
**From:** Athanasios Hatzopoulos, OSC  
**Date:** 1/26/2024  
**Reporting Period:** 11/13/23-1/26/24

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	01NE	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	1/26/2023
<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 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 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. 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:

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November 13, 2023, thru January 26, 2024

Continued excavating and stockpiling approximately 1,200 tons of PCB and VOC contaminated soil from the west, central and eastern portions of the Site (city and DCR owned land which contains the former concrete foundation pad). The soil excavation was implemented to a depth of approximately 3.5-4 feet under the pad. Sporadic VOC odors and elevated VOC emission levels were noted on both AreaRAEs and multiRAEs in the immediate area of the excavation. The VOC suppressant foam was applied to excavated areas and excavated soils where VOC odors were present, with satisfactory results. Additionally, in areas with no VOC concerns, copious amounts of water was also used for dust suppression.

Large boulders and numerous large concrete blocks were also encountered below the foundation pad, some in the range of 6 feet by 6 feet by 6 feet, as well as concrete footings up to 5 feet deep. These were also excavated. The concrete (pad and footings) was further broken into smaller pieces and staged to the east against the bridge abutment. Several broken clay pipes were found in and below the foundation areas.

No work was conducted from November 22 to 26, 2023, December 11 and 18, 2023 and December 22 to January 2, 2024, due to a combination of holidays, schedules, and weather conditions.

PCB and VOC post-excavation soil sampling results were received from the excavated areas: a) leather-like waste area/far west end of the Site. PCBs ranged from 0.92 mg/kg to 54 mg/kg, and b) excavated areas under the concrete pad at a depth of 3.5-4 feet below original ground surface. PCBs ranged from 13 mg/kg to 230 mg/kg. VOC analytical results from the excavated areas also indicated exceedances above the EPA RMLs. The OSCs met with the EPA PCB Coordinator to discuss tentative PCB action levels and requirements for the state and city owned parcels undergoing removal activities.

Received acceptance approval for 2,000 tons from Heritage Environmental Services located in Roachdale, Indiana. Loadout and transportation began on January 23 and will continue until the 1,200 tons are transported off site. From January 23 to 25, 23 trucks (approximately 850 tons) were transported off site during this time period. All truck loadout and transportation activities have been 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. 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.

Continued securing the excavated 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.

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

Representatives from MassDEP, city and CDR also visited the Site to get updates and observe work progress.

To date no rodents have been observed at the Site. Inspection of the rodent traps is done monthly by a hired licensed exterminator.

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	1,230.21 tons		Landfill	Casella USA landfill, Coventry, VT

PCBs	Soil debris	860 tons		Landfill	Heritage Landfill, Roachdale, Indiana
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## 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, \$100,000 was used from the \$653,000 extramural contingency funds and added to the original \$185,000 START funding. \$185,000 (original START)+\$100,000 (original extramural)= \$285,000 START

### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$3,080,000.00	\$1,700,000.00	\$1,380,000.00	44.81%
START	\$285,000.00	\$249,430.00	\$35,570.00	12.48%
Extramural Contingency 20%	\$553,000.00	\$0.00	\$553,000.00	100.00%
<b>Intramural Costs</b>				
USEPA - Direct	\$100,000.00	\$90,000.00	\$10,000.00	10.00%
<b>Total Site Costs</b>	<b>\$4,018,000.00</b>	<b>\$2,039,430.00</b>	<b>\$1,978,570.00</b>	<b>49.24%</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-4 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.