

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: POLREP #12
Final
Lewis Chemical
01NE
Hyde Park, MA
Latitude: 42.2528593 Longitude: -71.1197482

To: POLREP distribution, EPA

From: Athanasios Hatzopoulos, OSC

Date: 10/22/2024

Reporting Period: 7/1/2024 to 10/22/2024

1. Introduction

1.1 Background

Site Number:	01NE	Contract Number:	
D.O. Number:		Action Memo Date:	3/27/2024
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:	10/22/2024	Completion Date:	10/22/2024
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. 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 July 1, 2024 through September 27, 2024.

July 1, 2024 to September 27, 2024

During this reporting period ERRS continued and completed the Site restoration activities as follows:

Purchased and accepted delivery of the following soil and stone amounts to complete the Site restoration:

- 675 tons of 3-inch minus gravel (29 truck loads)
- 70 tons of 1.5-inch minus gravel (three truck loads)
- 704 cubic yards of topsoil (32 truck loads)
- 44.5 tons of stone dust (two truck loads)

The 3-inch gravel was spread across the Site and compacted in 6-inch lifts with a vibratory roller. Water was used for dust suppression and also to aid the compaction of the gravel. All armor stone (riverbank stone) removed during earlier excavation activities was replaced along the riverbank at the original configuration and height of the riverbank. Once all the armor stone and gravel were in place, topsoil was spread throughout the Site at a height of 6 inches. An erosion control sock was also installed along the top of the armor stone along the entire length of the riverbank. During the topsoil spreading activities, EPA, DCR and the City discussed the construction of an access way to the river for future river work. DCR, the City and EPA agreed to a plan that would entail changing the riverbank grade in order to facilitate access to the river. The access way to the river was constructed using armor stone at the lowest point of the access way to the river. The access roadway included a layer of geotextile fabric, a layer of stone dust, a layer of 1.5-inch stone, and a final layer of stone dust for compaction purposes. This process was also wetted down with water and compacted using a vibratory roller and a plate compactor. An armor stone wall was constructed at the base of the access way to keep any soil from falling onto the access way.

During this time frame, EPA provided periodic updates to the city, MassDEP and DCR of work being performed.

START periodically visited the Site, recorded and photo documented the removal activities.

On July 29, 2024, a meeting with the Lower Neponset River Remediation Team, EPA Enforcement Team, EPA Removal Team and the MassDEP representative was held onsite to view the activities and receive updates.

The Site was hydroseeded on September 10 and watered daily by the hydroseed contractor.

On September 20, the fence for Aspen Consulting, in consultation and approval of the Aspen Consulting, was replaced with similar new fence.

On October 4, a Press Event was held at the Site to celebrate the Lewis Chemical Site as well as other nearby EPA Sites. The event was attended by members of EPA including Regional Administrator David Cash, members of the City of Boston including Mayor Michelle Wu, Massachusetts Department of Conservation & Recreation (DCR), Massachusetts Department of Environmental Protection (MassDEP), as well as members of community organizations and the press.

As requested by Aspen, on October 22, EPA restored Aspen's roadway used for T&D purposes by spreading 3/8" crushed stone.

On October 22, the OSC inspected the Site and verified that all EPA personnel and equipment, including contractors have been demobilized and that all Site work is complete.

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

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
PCBs	Leather/pleather/soil/debris	1,230 tons		Landfill	Casella USA landfill, Coventry, VT
PCBs/VOCs/lead	Soil debris	4,470 tons		Landfill	Heritage Landfill, Roachdale, Indiana

2.2 Planning Section

2.2.1 Anticipated Activities

None

2.2.1.1 Planned Response Activities

None

2.2.1.2 Next Steps

Refer the Site to MassDEP and the City to follow up with other long term measures that may be required to address remaining Site risks, including post removal site controls.

2.2.2 Issues

None

2.3 Logistics Section

n/a

2.4 Finance Section

2.4.1 Narrative

This table reflects original AM ceiling and funding requested in AMA.

COST CATEGORY	CURRENT CEILING	PROPOSED INCREASE	PROPOSED CEILING
<i>REGIONAL REMOVAL ALLOWANCE COSTS:¹</i>			
ERRS ² Contractor	\$3,080,000	\$840,000	\$3,920,000
Interagency Agreement	\$0	\$0	\$0
<i>OTHER EXTRAMURAL COSTS NOT FUNDED FROM THE REGIONAL ALLOWANCE:</i>			
START Contractor	\$185,000	\$160,000	\$345,000
Extramural Subtotal	\$3,265,000	\$1,000,000	\$4,265,000
Extramural Contingency 20%	\$653,000	\$0	\$653,000
TOTAL, REMOVAL ACTION CEILING	\$3,918,000	\$1,000,000	\$4,918,000

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$4,458,000.00	\$3,500,000.00	\$958,000.00	21.49%
START	\$460,000.00	\$360,000.00	\$100,000.00	21.74%
Intramural Costs				
USEPA - Direct	\$0.00	\$180,000.00	(\$180,000.00)	0.00%
Total Site Costs	\$4,918,000.00	\$4,040,000.00	\$878,000.00	17.85%

* 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.