

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Former Tombarello and Sons Property Site (second removal action) - Removal Polrep
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: POLREP #2
Final POLREP
Former Tombarello and Sons Property Site (second removal action)

Lawrence, MA
Latitude: 42.7174990 Longitude: -71.1410129

To: Polrep Distribution, USEPA-R1

From: Tom Condon, OSC

Date: 3/28/2019

Reporting Period: 12/13/2018 to 2/11/2019

1. Introduction

1.1 Background

Site Number:	01FQ	Contract Number:	EP-S1-16-01
D.O. Number:	68HE118F0314	Action Memo Date:	9/13/2018
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	12/3/2018	Start Date:	12/3/2108
Demob Date:	2/11/2019	Completion Date:	2/11/2019
CERCLIS ID:	MAD019426238	RCRIS ID:	
ERNS No.:		State Notification:	MassDEP notified
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time Critical Removal

1.1.2 Site Description

The Site is the former location of John C. Tombarello and Sons Inc., (and subsequently American Recycling Inc.) which operated a metal recycling facility from 1947 until 2001. It is believed that site operations resulted in the release of PCBs, heavy metals and petroleum products resulting in contaminated surface soils.

In 2011 EPA undertook a removal action at the Site which involved the removal of PCB contaminated soil from a portion of the Former Tombarello and Sons Property, as well as several abutting residential properties. This second removal action addresses contaminated soil on a different portion of the Site.

1.1.2.1 Location

The Site is located 207 Marston Street (Map 33, Lot 17-2); (42 43' 10.88 North latitude, 071 08' 29.41 West longitude) and is in a mixed industrial/residential area. It is bounded on the east by I-495, on the west by Marston Street, on the north by residential properties located on Hoffman Avenue, and on the south by industrial properties. A middle school is located across Marston Street.

1.1.2.2 Description of Threat

Surface soils are contaminated with PCBs and Lead. The Department of Health and Human Services (DHHS) has concluded that both PCBs and Lead may be reasonably be anticipated to be carcinogens. Although access to the Site is restricted, there is significant evidence of trespassing on the Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The Site is currently owned by the City of Lawrence. The City has been working with EPA's Brownfields Program and MassDEP to fully characterize and develop a cleanup plan for the Site. A Targeted Brownfields Assessment was conducted, which indicated the presence of PCB and heavy metal contamination in surface soils at several locations on the Site.

At the request of EPA's Brownfields Program, a Removal Preliminary Assessment and Site Investigation (PA/SI) was conducted. The results of the PA/SI identified one area on the Site with PCB concentrations above levels of concern, and a potentially high probability of human contact. The findings of the PA/SI were documented in a March 2, 2018 Closure Memorandum, with a recommendation that a time-critical removal action be conducted.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA conducted a removal action at the Former Tombarello and Sons Site.

2.1.2 Response Actions to Date

EPA's ERRS contractor mobilized to the Site on December 3, 2018, and began preparing the Site. Excavation of contaminated soil was initiated on December 5,

and the excavated soil was stockpiled on-site. Excavation was completed on December 11. The total volume excavated is estimated at 1,000 cubic yards.

On December 12, EPA's START contractor collected samples from the base and sides of the excavated area, to document post-removal conditions. On December 13, the ERRS contractor began backfilling the excavation with clean fill.

On December 12 and 13, the ERRS contractor treated the excavated soil with a stabilizing agent to prevent lead from leaching from the soil. Samples were collected on December 13, which will be analyzed to determine if the treatment was successful in meeting TCLP requirements for disposal.

By December 17, EPA had completed backfilling the excavated areas, and temporarily suspended site operations pending results of the TCLP analyses.

EPA received analytical reports indicating that the treated soil passed TCLP, and on February 4, 2019, EPA returned to the Site. Between February 5 and February 8, Thirty-two truckloads of stabilized soil, with a total weight of 657.65 tons, were shipped off-site to Heritage Environmental Services, LLC, in Roachdale, Indiana, for disposal.

EPA completed restoration of response related damage, and demobilized from the site on February 11, 2019.

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

No viable Potentially Responsible Parties have been identified.

2.1.4 Progress Metrics

Date	Wastestream	Manifest Number	Total Quantity		Container Type/No.		Transporter	Destination
2/5/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959921 WAS	39,680	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/5/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959922 WAS	41,720	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/5/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959923 WAS	44,160	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/5/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959925 WAS	41,500	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/5/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959924 WAS	31,120	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/5/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959926 WAS	37,280	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/5/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959927 WAS	40,020	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/5/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959928 WAS	40,280	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/5/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959929 WAS	30,980	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/5/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959930 WAS	40,260	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/5/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959931 WAS	43,900	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN

2/5/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959932 WAS	41,820	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/6/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959933 WAS	43,560	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/6/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959934 WAS	40,600	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/6/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959940 WAS	45,680	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/6/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959935 WAS	39,740	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/6/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959937 WAS	44,100	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/6/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959936 WAS	45,780	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/6/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959938 WAS	42,180	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/6/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959941 WAS	43,040	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/6/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959939 WAS	44,660	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/6/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959942 WAS	41,500	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN

2/6/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959943 WAS	37,680	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/6/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959945 WAS	40,260	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/6/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959947 WAS	41,080	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/6/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959946 WAS	46,420	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/6/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959944 WAS	41,240	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/6/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959950 WAS	38,560	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/7/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959948 WAS	29,000	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/7/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959949 WAS	45,560	P	CM	1	Goulet Trucking Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/7/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000953042 WAS	38,920	P	CM	1	Heritage Transport LLC	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN
2/8/2019	RQ, UN3432 Polychlorinated Biphenyls, Solid, Mixture, 9 PGIII, (PCB Remediation Waste), (RQ = 1 LB.), ERG#171	000959951 WAS	53,020	P	DT	1	U.S. Bulk Transport Inc.	Heritage Environmental Services 4370 W County Road 1275 N Roachdale, IN

N.O.S. = not otherwise specified
 UN = United Nations
 No. = Number
 CM = Containers, metal
 LB. = Pounds
 ERG# = Emergency Response Guide

PG = Packing Group
 RQ = Reportable Quantity
 DOT = Department of Transportation
 PCB = Polychlorinated Biphenyl
 P = Pounds

2.2 Planning Section

2.2.1 Anticipated Activities

N/A

2.3 Logistics Section

N/A

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	%
Extramural Costs				
ERRS - Cleanup Contractor	\$1,000,000.00	\$625,000.00	\$375,000.00	37.50%
TAT/START	\$100,000.00	\$62,000.00	\$38,000.00	38.00%
Intramural Costs				
USEPA - Direct	\$80,000.00	\$25,000.00	\$55,000.00	68.75%
Total Site Costs				
	\$1,180,000.00	\$712,000.00	\$468,000.00	39.66%

* 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

Site Operations were conducted in accordance with a Site Specific Health and Safety Plan

2.5.2 Liaison Officer

N/A

2.5.3 Information Officer

An EPA Community Involvement Coordinator (CIC) was assigned to the site. The EPA CIC created a fact sheet on the project for distribution to the public, and conducted outreach activities to the community.

3. Participating Entities

3.1 Unified Command

EPA

3.2 Cooperating Agencies

City of Lawrence and MassDEP

4. Personnel On Site

N/A

5. Definition of Terms

N/A

6. Additional sources of information

6.1 Internet location of additional information/report

N/A

6.2 Reporting Schedule

N/A

7. Situational Reference Materials

N/A