



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NORTHEAST REGIONAL OFFICE

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DEC 23 2009

Mr. David McIntyre
Chief, Emergency Response and
Removal Section
EPA New England
One Congress Street, Suite 1100
Boston, MA 02114-2023

RE: LAWRENCE: Former Tombarello and Sons
207 Marston Street
RTN: 3-18126
Request for Assistance

Dear Mr. McIntyre:

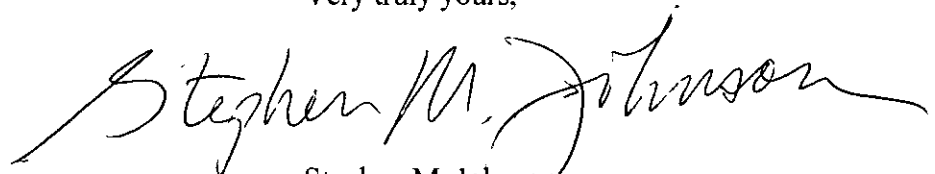
The purpose of this letter is to restate our previous request for assistance from USEPA's Emergency Response and Removal Section to perform remedial activities at the subject site and at the impacted residential properties on Hofmann Avenue that abut the site. Since levels of PCBs and metals exist at the site and the abutting residential properties that may pose significant risk to public health, MassDEP recommends that, at a minimum, soil removal and/or capping on the source property be explored to prevent exposure and to abate the potential health risks that are present to the public. Previous environmental sampling at the source property identified very high levels of metals, specifically lead, and polychlorinated biphenyls (PCBs) and there were several areas documented as being "hot spots" where contaminant levels may pose an "Imminent Hazard". However, subsequent scavaging for metal debris on site caused soils to be moved around on the source property such that the previous soil sampling data may not be indicative of current contaminant conditions. Therefore, it will be necessary to conduct additional soil testing to define the vertical and horizontal extent of contamination at the source property prior to determining a remedial strategy. The previous metal scavaging generated a large soil stockpile in the rear of the property, and there continues to be a large continuous soil berm along the north and northeastern boundaries of the property both of which require further assessment and likely remediation. The source property is currently fenced on all four sides. The fence along Hofmann Avenue is six foot high stockade which has been recently replaced and repaired in many areas. The fence along Marston Street is six foot high chain link with a locked gate at the front entrance. The fence along the bermed portion of the site is four foot high post and barbed wire. There is currently no fence separating the site from the Waste Management facility operations which abut the site to the southeast.

As discussed in our April 2, 2008 letter to USEPA, an MCP Method 3 Imminent Hazard Evaluation was performed for each of the nine residential properties on Hofmann Avenue where surficial soil sampling was performed under the direction of MassDEP in October 2007. The

resulting data for all nine residential properties showed levels above those that may pose an Imminent Hazard to human health from a homegrown produce consumption pathway. At the time of MassDEP sampling, only one of the nine residences cultivated a vegetable garden for consumption. This garden was subsequently abandoned. Since none of the nine properties currently cultivates a vegetable garden for consumption, this exposure pathway is a potential future risk. Currently, using MassDEP Method 1 Risk Characterization standards, four of the residences (19, 41, 51 & 53 Hofmann Avenue) have average concentrations of lead, PCBs, and/or metals in soil above MassDEP's GW-2/GW-3 S-1 soil standards which may pose a significant risk to the health of the residents. In addition, five of the residences (21, 25, 41, 51 and 53 Hofmann Avenue) have average concentrations of PCBs above 1 mg/kg, which is USEPA's cleanup level for residential exposure in surficial soil. It is MassDEP intention, with the assistance of USEPA, to remediate the surficial soil within the back yards of the six residences with contaminant levels above MassDEP and USEPA standards to a maximum depth of three feet below ground surface using MassDEP's S-1 soil standards and/or published Background⁽²⁾ concentrations for metals and 1 mg/kg for PCBs as cleanup standards. If a level of No Significant Risk cannot be achieved at a property, then we will recommend that an Activity and Use Limitation (AUL) be placed on the deed for the property.

Thank you for your consideration of this project. Please contact Valerie Thompson at the letterhead address or at (978) 694-3348 to discuss this request at your convenience. We look forward to hearing from you in the near future.

Very truly yours,



Stephen M. Johnson,
Deputy Regional Director
Bureau of Waste Site Cleanup
Northeast Regional Office

⁽²⁾ Published Background concentrations for metals were obtained from MassDEP's Technical Update Background Levels of Polycyclic Aromatic Hydrocarbons and Metals in Soil, May 2002 [Table 1 - Concentration in "Natural" Soil].