

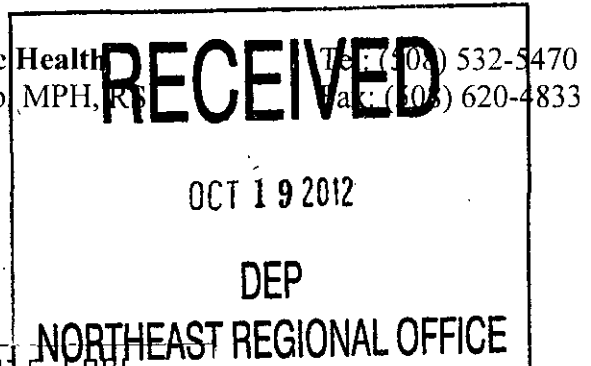


**TOWN OF FRAMINGHAM**  
**Board of Health**  
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**Board of Health**

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Ethan Mascoop, MPH, RD



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October 15, 2012

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Ms. Karen Stromberg  
Massachusetts Department of Environmental Protection  
Bureau of Waste Site Cleanup  
205B Lowell Street  
Wilmington, MA 01887

RTN 3-0019174 133-135 AND 91 LELAND ST FRAMINGHAM

RE: Board of Health Comments for Development of MCP Public Information Plan – General Chemical Corp., 133 Leland Street, Framingham, MA

Dear Ms. Stromberg:

The Town of Framingham Board of Health was recently informed by the Massachusetts Department of Environmental Protection (MassDEP) and GES, Inc. (consultants for General Chemical Corp.) that General Chemical Corp.'s (GCC) hazardous waste site at 133 Leland Street in Framingham, MA has been designated as a Public Involvement Plan (PIP) site under the Massachusetts Contingency Plan (MCP) regulations. The Board of Health is providing you with these comments regarding the development of the PIP.

In general, the PIP should include the following:

- 1) MCP Regulations: The PIP should follow rules at 310 CMR 40.1400 and should be developed upon MassDEP's Model PIP Plan; the process and schedule should be clear and concise, and address the community's needs and requests;
- 2) Languages: Translations to the appropriate languages for the community must be included (Portuguese, Spanish), for both written and verbal (meetings) information;
- 3) GCC should comply with all PIP requirements listed in the 2012 BOH Site Assignment for GCC; and
- 4) Web-based information: The core of the public notification process should be through a fully functional internet site developed and managed by GCC.

We acknowledge that the PIP process is time-consuming and resource-intensive; however, we assume that the cost of meeting the PIP requirements will be the responsibility of GCC, rather than the Town or MassDEP. Outlined below are more detailed comments regarding the PIP site designation and development of the PIP.

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### Web-Based Information:

A PIP website should be developed that has the following features:

- a) The website should have a pull down menu on the home page that allows the site viewer to select the language, for example using a translation icon. Google Translator and other equivalent software allows for this function on a standard website. An example is the Williamspto.org website.
- b) The web page should have a comprehensive document reference list by author and date that includes all the relevant documents related to the GCC site such as site investigation, remediation, approved work plans, draft work plans, studies, status and progress reports, regulatory submittals, public correspondence and other information for the GCC site and should be regularly updated. Each of these documents should individually be scanned and available for download including all text, figures, tables and appendices in a manner that easily allows downloading from the web page.
- c) The web page should allow persons to sign up to get direct mailings and be officially added to the PIP group.
- d) The web page should allow for persons to enter questions about specific documents or general questions and for GCC to post responses in a timely manner available for others to review the Q&A, unless the commenter specifically requests that the response not be posted.
- e) The web site should have information that is more recent (most recent quarter) posted at an additional location in the web page. Thus, interested parties can check for new updates instead of having to sort through the cumulative documents listing. The recent documents would include such documents as the most recent status/progress reports, draft and final sampling plans, newly issued reports, new correspondence, and new Q&A. The web page should be updated to remove old information each quarter and replace with the newer data as it is developed. The web page should be updated at least monthly.
- f) The web page should include a discussion of upcoming plans such as proposed sampling, decommissioning activities, post closure activities, well and boring installation, dates of planned activities and length of activity including a calendar of activities for the next month. The upcoming information should also include the information about any heavy equipment and noisy equipment that will be used and hours of operation.
- g) The web page should have contact information of key GCC contact persons for site work by name, position, responsibility and work phone, email and cell phone number. The site should also list key MassDEP and Town of Framingham (as agreed upon by the Town) contact information by name, position, responsibility, email and work phone number.
- h) The site should include information about any safety and health plans that are being implemented, ongoing environmental monitoring, and/or any site specific action levels using being used to control neighborhood exposure. A plan should be provided for health alerts to Town representatives and the affected community in the event of a reportable release from the GCC site.

### Other Comments:

- 1) Repository information: With regard to additional document repositories, GCC should compare their lists of historical documents to those on file at the Framingham Main Library. In the event the library is

missing any documents or they have been lost or incomplete, then GCC shall submit new copies to the library. All new documents produced for the GCC site shall be sent to the library for filing.

- 2) Public Notices: The public notices should be posted in the Boston Globe, MetroWest Daily, and Framingham Tab newspapers.

Comments on PIP presentation to the community (Presentation should cover the following topics):

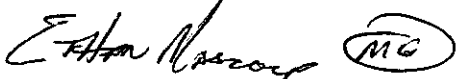
- 1) Describe overall PIP Process including flow diagrams and comment response opportunities, availability of documents, timelines for process
- 2) Clarify the distinction between the RCRA “Closure” Process and the MCP “Remedial Action;” provide an overall discussion of what has been done at the site to date, under what program, to partially achieve cleanup including recent closure activities. Describe areas cleaned-up, wastes/structures removed, cleanup verification techniques and results, describe any closure activities remaining and timeline for release of closure report
- 3) describe the nature and extent of known and suspected remaining contamination in each medium (soil, SW, GW, soil gas, sediment)
- 4) Describe potential health impacts associated with released contaminants to human health and environment, routes of exposure such from contaminants in air, soil gas, surface water, sediment, aqueduct, drinking water
- 5) Describe the MCP site investigation and remediation process as it applies to GCC ,and the timeline for MCP actions going forward
- 6) Describe various entities involved in site cleanup such as MassDEP, local Board of Health, and local Conservation Commission
- 7) Describe how contamination that has migrated off the GCC property to Exelon, Century Estates Condominium property, town property, residences, car wash, and Town of Sherborn/private wells will be addressed in the future
- 8) Describe currently ongoing site investigation work plan (Data Gap plan) and any initial information results based on visual or field monitoring that has been conducted (assuming laboratory data not yet available)
- 9) Describe methods for assuring that GCC will have sufficient money set aside to finish the characterization and remediation
- 10) Provide contact information for GCC
- 11) Provide information on web pages set up by GCC to inform the community about the site (discussion of web site content described above)
- 12) Have a Spanish/ Portuguese translator available
- 13) Address the community’s concerns about impacts to the school and neighborhood
- 14) Address the community’s concerns about the future use of that parcel of land and downgradient properties impacted by the groundwater contaminants.

We appreciate your reaching out to us for comments, and intend to work cooperatively with all parties during this process.

General Chemical Corp. – PIP Site Comments  
133 Leland Street, Framingham, MA  
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If you have any questions, please contact me at (508) 532-5470.

Very truly yours,



Ethan Mascoop, MPH, MUA, RS  
Director of Public Health  
Framingham Board of Health

cc: Mr. Steven Johnson, DRD, NERO – MassDEP  
Members Board of Health  
Robert Halpin, Town Manager  
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