

**REMOVAL PROGRAM
AFTER ACTION REPORT
FOR THE
CASS TOY COMPANY (FORMER) SITE
ATHOL, WORCESTER COUNTY, MASSACHUSETTS
12 OCTOBER THROUGH 23 NOVEMBER 2020**

Prepared For:

U.S. Environmental Protection Agency
Region I
Emergency Planning and Response Branch
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912

CONTRACT NO. 68HE0120D0001

TO/AD NO. TOFP-01-20-10-0002

SITE ID. 01QG

TASK NO. 0065

DC NO. R-50187

Submitted By:

Weston Solutions, Inc.
Region I
Superfund Technical Assessment and Response Team
101 Billerica Avenue, Building 5
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1.0 INTRODUCTION

The following report, entitled *Removal Program After Action Report for the Cass Toy Company (Former) Site, Athol, Worcester County, Massachusetts, 12 October Through 23 November 2020*, is a chronological summary of the response actions taken by the U.S. Environmental Protection Agency (EPA), Region I, Emergency Planning and Response Branch (EPRB). The report details the situation as it developed, actions taken, and resources committed.

Site activities included mobilizing personnel from Weston Solutions, Inc. (Weston), EPA's Superfund Technical Assessment and Response Team (START) V contractor, and Environmental Restoration, LLC, EPA's Emergency and Rapid Response Services (ERRS) contractor, to the Site to conduct Removal Action support activities.

Site activities conducted by START included: mobilizing personnel and equipment; delineating the Exclusion Zone (EZ), the Contamination Reduction Zone (CRZ), and Clean Zone (SZ); documenting and photodocumenting site conditions and activities; using EPA's Viper telemetry system to collect data while conducting daily air monitoring using particulate air monitors; collecting post-excavation soil samples; and demobilizing personnel and equipment.

Site activities conducted by ERRS included: mobilizing personnel and equipment; clearing brush and vegetation from the area surrounding the Site; excavating and stockpiling soil with asbestos-containing material (ACM) and non-ACM (wood and metal debris, miscellaneous debris); conducting transportation and disposal (T&D) activities; backfilling excavations; conducting site restoration activities; and demobilizing personnel and equipment.

2.0 SITE CONDITIONS AND BACKGROUND

2.1 Site Location and Description

The Cass Toy Company (Former) Site (the Site) is located at 62 Canal Street in Athol, Worcester County, Massachusetts (MA) (see Appendix A, Figure 1) [1]. The Site is approximately 1.3 acres and is identified on the Town of Athol Geographic Information System (GIS) and Property Database as Lot No. 105. The Site is a vacant lot, bordered to the north by residential and commercial properties; to the east by Canal Street and residential properties; to the south by residential properties and wooded areas; and to the west by the Millers River (see Appendix A, Figure 2) [2].

The Site and surrounding properties are served by municipal water and sewer. The Site is located within an Interim Wellhead Protection Area and Mapped Zone II for the Town of Athol Public Water Supply. The Site is within 500 feet of surface water, and within 500 feet of an endangered species habitat.

2.2 Site History/Previous Actions

From 1896 to approximately 2003, the former N.D. Cass Company manufactured a wide variety of children's toys and musical instruments, including pianos, drums, chalkboards, and wooden furniture.

On 19 January 2012, Massachusetts Department of Environmental Protection (MassDEP) was notified by the Athol Fire Department (AFD) regarding potential petroleum and chemical releases due to a large fire at the former N.D. Cass Company, located at 62 Canal Street, Athol, MA. MassDEP responded to provide support to the incident. According to MassDEP, there did not appear to be any release of petroleum or chemicals resulting from the fire. However, it was suspected that asbestos materials within the building may have been released during the fire. Due to the fire, the building was destroyed, resulting in five debris piles remaining on the Site.

In 2017, the Town of Athol hired a contractor to sample the five debris piles for asbestos contamination. Of the five debris piles, asbestos contamination was detected in two debris piles.

In January 2019, the Montachusett Regional Planning Commission hired a contractor to sample the debris piles to further determine if asbestos was present. Two of the largest piles were sampled, and ACM was identified by laboratory analysis. In pile number (no.) 1, roofing material was found to contain chrysotile asbestos at 5%, although felt-lime roofing material was non-detect. In pile no. 2, transite wallboard was found to contain 18% chrysotile asbestos [3].

On 6 March 2020, EPA and START mobilized to the Site to conduct sampling activities. START personnel collected six bulk asbestos samples (including one duplicate) from two rubble/debris piles, and three bulk asbestos samples in the backfilled foundation area adjacent to Canal Street. START also collected one soil sample from the soil pile adjacent to the entrance area, and one composite soil sample (including one duplicate) from five areas in the backfilled foundation area adjacent to Canal Street. Subsequently, on 30 June 2020, EPA and Weston START mobilized to the Site to conduct sampling activities on the 11 Linden Park property (Lot 114). START personnel established a grid over accessible portions of Lot 114 and collected 10 surface soil samples (including one duplicate) from nine locations [4].

Analytical results from on-site samples indicated two sample locations contained 12% chrysotile in transite wallboard, and one location contained 1% chrysotile roofing; the remainder of the samples were less than 1% or non-detect.

Analytical results of the Lot 114 property samples indicated that all asbestos results were less than 1%, or non-detect, and that all metals concentrations were below the EPA Removal Management Levels for Residential Soil.

3.0 SUMMARY OF FEDERAL RESPONSE ACTIONS

3.1 Organization of the Response

ORGANIZATION OF THE RESPONSE		
Organization	Representatives	Responsibilities
U.S. Environmental Protection Agency (EPA) Emergency Planning and Response Branch (EPRB) 5 Post Office Square, Suite 100 Boston, Massachusetts 02109-3912 (617) 918-1217 Young (617) 918-1359 Bowden Office	Catherine Young Allyson Bowden	EPA On-Scene Coordinator (OSC) responsible for the initiation, oversight, and completion of all removal activities. The OSC coordinated with State and local officials.

ORGANIZATION OF THE RESPONSE		
Organization	Representatives	Responsibilities
Weston Solutions, Inc. (Weston) Superfund Technical Assessment and Response Team (START) 101 Billerica Avenue, Building 5, Suite 103 North Billerica, Massachusetts 01862	Tyler Evans Chris Dupree Eric Ackerman	START Site Personnel that provided the OSC with technical assistance, site documentation, site health and safety monitoring, air monitoring, and draft and final report preparation.
Environmental Restoration, LLC (ER LLC) Emergency and Rapid Response Services (ERRS) 110 Granby Street Bloomfield, CT 06002	Blake MacKinney	Response Manager (RM) for the ERRS contractor that performed removal activities. The RM was responsible for oversight and organization of mobilization, demobilization, and waste removal activities.

3.2 Mobilization and Site Preparation

The Site-specific removal health and safety plan (HASP) was reviewed and signed by all personnel before any work commenced. In addition, emergency telephone numbers and directions to the hospital were posted and work zones were delineated. All activities were performed in appropriate personal protective equipment (PPE) in accordance with the HASP. The HASP was prepared by START personnel as a separate document, entitled *Health and Safety Plan for the Cass Toy Company (Former), Athol, Worcester County, Massachusetts* [5]. On 12 October 2020, the mobilization and staging of Emergency and Rapid Response Services (ERRS) equipment was initiated.

Site preparation activities conducted by ERRS personnel consisted of mobilizing one container express (CONEX) storage box, one excavator, one skid steer, two portable toilets, and a diesel-powered electrical generator.

3.3 Chronology of Removal Activities

Week of 24 August 2020

EPA Superfund and Emergency Management Division (SEMD) Director Bryan Olson signed the Action Memorandum approving the proposed removal action.

21 September 2020

A site walk was conducted with the following personnel:

- Catherine Young – US EPA OSC
- Blake MacKinney – ER, LLC Response Manager (RM)

Week of 12 October 2020

Personnel on site:

OSC – EPA	Catherine Young Allyson Bowden
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START – Weston	Tyler Evans Chris Dupree
ERRS Response Manager (RM) – ER, LLC	Blake MacKinney
ERRS Crew – ER, LLC	1 operator 4 laborers

Equipment on site:

Type	Quantity
Excavator	1
Man-Lifts	2
Storage Container	1
Portable Toilet	2
Generator	1
Decontamination/Dress Out Trailer	1

Activities for the week included:

- Developed a site-specific work plan providing estimates of materials, time and costs.
- Mobilized personnel and equipment to the Site.
- Conducted brush and vegetation removal from the Site.
- Signed the Site-specific Health and Safety Plan.
- Delineated work zones and decontamination area.
- Conducted separation of ACM debris from debris piles on site.

For the duration of the removal action:

- Daily airborne particulate monitoring was conducted in work areas using four TSI DustTrak Model DRX units. Data was captured via the VIPER telemetry system with results recorded via VIPER Deployment Manager.
- START photodocumented site activities (see Appendix B, Photodocumentation Log).
- All Non-Hazardous Waste shipped off site was recorded on Hazardous Waste Manifest Logs (see Appendix C).

Week of 26 October 2020

Personnel on site:

OSC – EPA	Catherine Young Allyson Bowden Allen Jarrell
START – Weston	Tyler Evans Eric Ackerman
ERRS RM – ER, LLC	Blake MacKinney
ERRS Crew – ER, LLC	1 operator 5 laborers

Equipment on site:

Type	Quantity
Excavator	1
Man-Lifts	2

Type	Quantity
Storage Container	1
Portable Toilet	2
Generator	1
Decontamination/Dress Out Trailer	1

Activities for the week included:

- Mobilized personnel to the Site.
- Excavated, separated, and stockpiled ACM-contaminated soil and debris.
- Lined 60-cubic-yard truck trailers with polyethylene sheeting and filled the trailers with ACM debris for U.S. Department of Transportation (DOT)-regulated transport to the disposal facility.
- Applied water on soil/debris piles for dust suppression.

Key dates:

Between 26 and 30 October 2020, a total of 16 trailers of ACM soil and debris departed the Site for transport to the disposal facility (Waste USA, Coventry, Vermont).

Week of 2 November 2020

Personnel on site:

OSC – EPA	Catherine Young Allyson Bowden Allen Jarrell
ERRS RM – ER, LLC	Blake MacKinney
ERRS Crew – ER, LLC	1 operator 4 laborers

Equipment on site:

Type	Quantity
Excavator	1
Man-Lifts	2
Storage Container	1
Portable Toilet	2
Generator	1
Decontamination/Dress Out Trailer	1

Activities for the week included:

- Excavated, separated, and stockpiled ACM-contaminated soil and debris.
- Lined 60-cubic-yard truck trailers with polyethylene sheeting and filled the trailers with ACM debris for U.S. DOT-regulated transport to the disposal facility.
- Applied water on soil piles for dust suppression.
- Demobilized personnel and equipment.

Key dates:

On 2 November 2020, ERRS completed the load-out of ACM soil and debris from the site, initiated decontamination of equipment, and demobilized equipment and supplies.

10 November 2020

EPA OSCs Allen Jarrell and Allyson Bowden and START members Bonnie Mace and Jacques Elias mobilized to Site. START personnel established a grid over the Site and collected 19 post-excavation soil samples for bulk ACM analysis at EPA Laboratory Services and Applied Sciences Division (LSASD) New England Regional Laboratory (NERL). Sampling activities were performed in accordance with the Site Sampling and Analysis Plan (SAP), which was prepared as a separate document, entitled *Sampling and Analysis Plan for the Cass Toy Company (Former) Site, Athol, Worcester County, Massachusetts* [7]. START personnel completed the Scribe chain-of-custody record and delivered the samples.

Analytical results indicated there were no actionable levels of asbestos in the post-excavation samples.

Week of 23 November 2020

Personnel on site:

ERRS RM – ER, LLC	Blake MacKinney
ERRS Crew – ER, LLC	1 laborer

Activities for the week included:

- Demobilized equipment and completed Site activities.

Key dates:

On 23 November 2020, ERRS completed demobilization of all remaining equipment and supplies.

4.0 ESTIMATED COSTS OF THE REMOVAL ACTION

EPA resources committed under this Removal Action are summarized below:

Cost Category	Ceiling	Costs Incurred	Remainder
Regional Removal Allowance Costs			
ERRS	\$250,000	\$135,746.13	\$114,253.87
START Contractor	\$150,000	\$25,704.54	\$124,295.46
Other Extramural Costs Not Funded from the Regional Allowance			
Extramural Contingency	\$80,000	\$0	\$80,000
Total Removal Project Costs	\$480,000	\$161,450.67	\$318,549.33

This accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. 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.

REFERENCES

- [1] US. Geological Survey. 1983. 7.5-minute topographic map, Athol, Massachusetts.
- [2] Esri, i-cubed, USDA FSA, USGS, AEX, GeoEye, Getmapping, Aerogrid, IGP. 2019. ArcGIS.com World Imagery Map. April.
- [3] Massachusetts Department of Environmental Protection. 13 June 2012. Response Action Outcome Statement, Former Cass Toy Factory.
- [4] Weston Solutions, Inc. September 2020. *Removal Program Preliminary Assessment/Site Investigation Report for the Cass Toy Company (Former) Site, Athol, Worcester County, Massachusetts, 6 March 2020 and 30 June 2020.*
- [5] Weston Solutions, Inc. February 2020. *Health and Safety Plan for Cass Toy Company (Former) Site, Athol, Worcester County, Massachusetts.*
- [6] Weston Solutions, Inc. July 2020. *Standard Operating Procedure for Thermo Environmental Instruments PID/FID Model TVA2020*, SOP No. WSI/S5-023, Superfund Technical Assessment and Response Team V (START), Billerica, MA.
- [7] Weston Solutions, Inc. October 2020. *Sampling and Analysis Plan for the Cass Toy Company (Former) Site, Athol, Worcester County, Massachusetts.*

Appendices

Appendix A

Figures

- Figure 1 - Site Location Map
- Figure 2 - Site Diagram
- Figure 3 - Post-Excavation Soil Sample Location Map

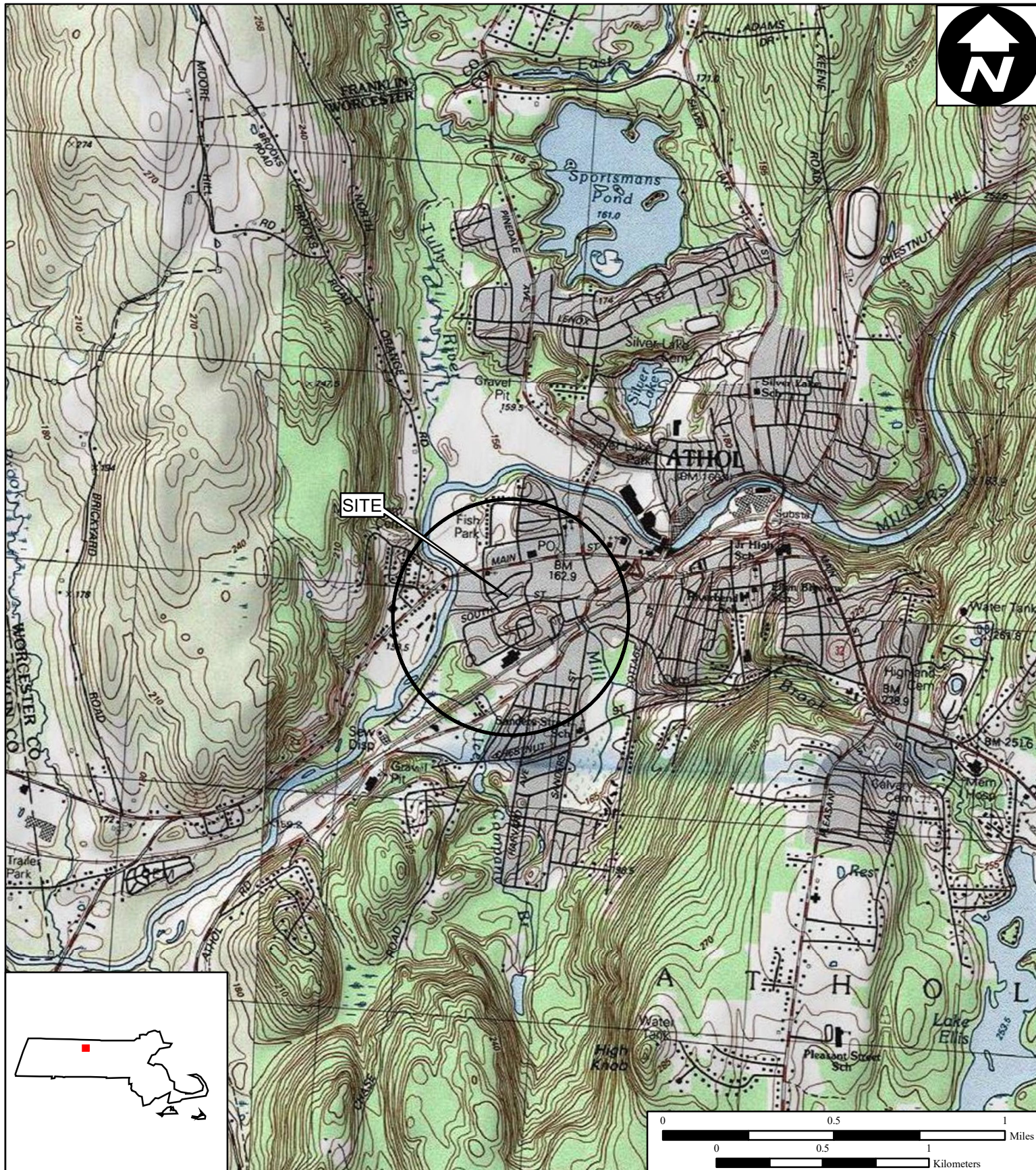


Figure 1

Site Location Map

**Cass Toy Company (Former) Site
62 Canal Street
Athol, Massachusetts**

**EPA Region I
Superfund Technical Assessment and
Response Team (START) V
Contract No. 68HE0120D0001**

AD Number: TOFP-01-20-10-0002
Created by: T. Evans
Created on: 28 February 2020
Modified by: T. Evans
Modified on: 19 October 2020

Data Sources:

Topos: MicroPath/USGS/USA Topo Maps
Quadrangle Name: Athol, Massachusetts
All other data: START









Figure 2

Site Diagram

**Cass Toy Company (Former) Site
62 Canal Street
Athol, Massachusetts**

**EPA Region I
Superfund Technical Assessment and
Response Team (START) V
Contract No. 68HE0120D0001
AD Number: TOFP-01-20-10-0002
Created by: T. Evans
Created on: 9 June 2020
Modified by: T. Evans
Modified on: 19 October 2020**

LEGEND

-  Site Boundary
-  Staging Area
-  Conex Box
-  Decontamination Area



0 20 40 80 120 160
Feet

Data Sources:

Imagery: ESRI, i-cubed, USDA FSA, USGS
AEX, GeoEye, Getmapping, Aerogrid, IGP
Topos: MicroPath
All other data: START



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS,
USDA, USGS, AeroGRID, IGN, and the GIS User Community

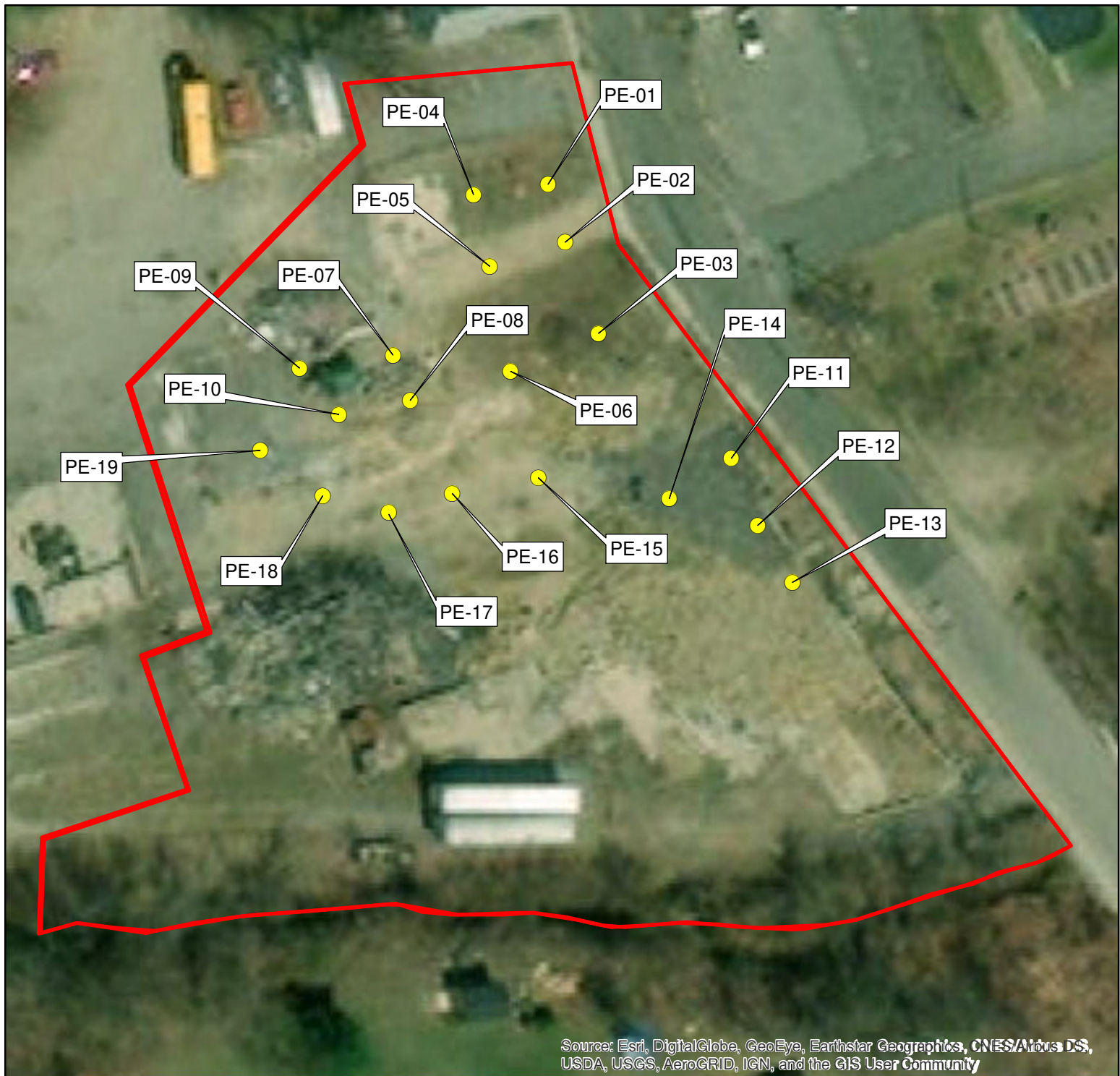



Figure 3
Post-Excavation
Soil Sample Location Map


Cass Toy Company (Former) Site
62 Canal Street
Athol, Massachusetts


EPA Region I
Superfund Technical Assessment and
Response Team (START) V
Contract No. 68HE0120D0001

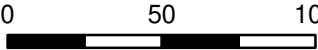
AD Number: TOFP-01-20-10-0002
Created by: T. Evans
Created on: 9 June 2020
Modified by: B. Mace
Modified on: 14 December 2020

LEGEND

 Site Boundary

 Post-Excavation Soil Sample Location




0 50 100
Feet

Data Sources:

Imagery: ESRI, i-cubed, USDA FSA, USGS
AEX, GeoEye, Getmapping, Aerogrid, IGP
Topos: MicroPath
All other data: START



Appendix B

Photodocumentation Log

PHOTODOCUMENTATION LOG
Cass Toy Company (Former) Site • Athol, Massachusetts



SCENE: View of the scissor lifts used to provide Emergency and Rapid Response Services (ERRS) personnel access to dump truck beds for wrapping asbestos-containing material (ACM) in polyethylene sheeting per Department of Transportation (DOT) specifications. Photograph taken facing east.

DATE: 13 October 2020

TIME: 0707 hours

PHOTOGRAPHER: T. Evans

CAMERA: Apple iPhone 8



SCENE: View of the excavator and debris piles on the Cass Toy Company (Former) Site. Photograph taken facing southeast.

DATE: 13 October 2020

TIME: 1011 hours

PHOTOGRAPHER: T. Evans

CAMERA: Apple iPhone 8

PHOTODOCUMENTATION LOG
Cass Toy Company (Former) Site • Athol, Massachusetts



SCENE: View of the Staging Area, located on the western portion of the Site. Photograph taken facing west.

DATE: 13 October 2020

PHOTOGRAPHER: T. Evans

TIME: 1013 hours

CAMERA: Apple iPhone 8



SCENE: View of the debris pile on Site containing ACM, wood, metal, and plastic debris. Photograph taken facing southeast.

DATE: 13 October 2020

PHOTOGRAPHER: T. Evans

TIME: 1152 hours

CAMERA: Apple iPhone 8

PHOTODOCUMENTATION LOG
Cass Toy Company (Former) Site • Athol, Massachusetts



SCENE: View of the ERRS decontamination area for equipment and personnel. Photograph taken facing south.

DATE: 14 October 2020

PHOTOGRAPHER: T. Evans

TIME: 1008 hours

CAMERA: Apple iPhone 8



SCENE: View of the debris pile and one of the four perimeter particulate air monitoring stations (DRX DustTraks) using the VIPER telemetry system. Photograph taken facing east.

DATE: 14 October 2020

PHOTOGRAPHER: T. Evans

TIME: 1114 hours

CAMERA: Apple iPhone 8

PHOTODOCUMENTATION LOG
Cass Toy Company (Former) Site • Athol, Massachusetts



SCENE: View of loading activities for ACM debris conducted by ERRS personnel. Photograph taken facing west.

DATE: 27 October 2020

PHOTOGRAPHER: T. Evans

TIME: 0743 hours

CAMERA: Apple iPhone 8



SCENE: View of the Container Express (CONEX) storage container with ERRS personal protective equipment (PPE) and supplies. Photograph taken facing west.

DATE: 28 October 2020

PHOTOGRAPHER: T. Evans

TIME: 1108 hours

CAMERA: Apple iPhone 8

PHOTODOCUMENTATION LOG
Cass Toy Company (Former) Site • Athol, Massachusetts



SCENE: View of the unlabeled containers and miscellaneous hazardous materials staged for overpacking and disposal. Photograph taken facing south.

DATE: 28 October 2020

PHOTOGRAPHER: T. Evans

TIME: 1109 hours

CAMERA: Apple iPhone 8

Appendix C

Waste Disposal Summary Table

**WASTE DISPOSAL SUMMARY TABLE
CASS TOY COMPANY (FORMER)
ATHOL, MASSACHUSETTS**

Disposal Facility:		Waste USA 21 Landfill Lane Coventry, VT 05825
Description of Materials:		RQ, NA2212, Asbestos, 9, III, DT, Lined dump trailer
Date	Waste Tracking Number	Trucking Company
10/26/2020	64298-L1	E.A .Russell Trucking
10/26/2020	64298-L2	E.A .Russell Trucking
10/26/2020	64298-L3	E.A .Russell Trucking
10/26/2020	64298-L4	E.A .Russell Trucking
10/27/2020	64298-L5	E.A .Russell Trucking
10/27/2020	64298-L6	E.A .Russell Trucking
10/27/2020	64298-L7	E.A .Russell Trucking
10/28/2020	64298-L8	E.A .Russell Trucking
10/28/2020	64298-L9	E.A .Russell Trucking
10/28/2020	64298-L10	E.A .Russell Trucking
10/29/2020	64298-L11	E.A .Russell Trucking
10/29/2020	64298-L12	E.A .Russell Trucking
10/29/2020	64298-L13	E.A .Russell Trucking
10/29/2020	64298-L14	E.A .Russell Trucking
10/30/2020	64298-L15	E.A .Russell Trucking
10/30/2020	64298-L16	E.A .Russell Trucking
11/4/2020	64298-L17	E.A .Russell Trucking
11/4/2020	64298-L18	E.A .Russell Trucking
11/4/2020	64298-L19	E.A .Russell Trucking

VT = Vermont

NA = North America

DT = Dump truck