

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT (POLREP)**

**I. HEADING**

**Date:** September 30, 2002  
**Subject:** Temple Stuart Site, Baldwinville, Massachusetts:  
Removal Action  
**From:** US EPA New England, Boston, MA  
**On-Scene Coordinator:** Mary Ellen Stanton  
**Polrep No.:** Initial - #1

**II. BACKGROUND**

**Site No.:** 01AC  
**Task Order No.:** 80  
**Response Authority:** CERCLA  
**ERNS No.:** N/A  
**CERCLIS #:** MAD985297969  
**NPL Status:** Not on the NPL  
**State Notification:** Massachusetts Department of Environmental Protection  
(MA DEP) notified  
**Action Memorandum:** Approved July 15, 2002  
**Action Memo Addendum #1** Approved August 20, 2002  
**Start Date:** July 22, 2002  
**Completion Date:** December 28, 2002

**III. SITE INFORMATION**

**A. Physical Location/Site Characteristics**

The Site is a 23-acre property with five abandoned, adjoining buildings and a garage, all in various stages of deterioration, located in a largely residential area at 4 Holman Street approximately three eighths of a mile from the center of Baldwinville, Massachusetts. Baldwinville is one of four villages in the Town of Templeton, population 7000. Several hundred residents live within a quarter mile. Located within a mile are an elementary school, a reform school, a nursing home, and two units of housing for the elderly.

The Site is bounded to the northeast by woods, wetlands, and a landfill area; to the northwest by Route 202; to the southeast by Holman Street and residences; and to the southwest by active railroad lines and residences. The public traverses through the property between Route 202 and local residential areas. Geographic coordinates of the center of the Site are 42° 36' 37" north latitude and 72° 04' 33.5" west longitude.

## **B. Removal Site Evaluation**

On November 9, 2001, I conducted a Removal Site Evaluation, meeting with contractor personnel from the Superfund Technical Assessment and Response Team (START), Massachusetts Department of Environmental Protection (MA DEP) representatives, representatives of the Site owner, the Templeton Board of Health Representative, and the Templeton Building Commissioner. We conducted exterior Site reconnaissance, followed by checking accessible interior portions of two buildings. Analysis of six bulk samples taken inside indicated the presence of friable asbestos at concentrations of up to 55 percent. We observed a rectangular tank with an approximately 10,000 gallon capacity in the boiler room. The tank's contents were unknown, and sampling it was not possible during the visit. I collected seven ACM samples outside. One sample from the surface of a debris pile indicated that friable asbestos (17%) had been disposed of outdoors.

Deteriorated and collapsing floors caused many building areas to be unsafe and inaccessible. In addition, windows formerly boarded up had been uncovered, and there was evidence of vandalism and deliberate entry of unauthorized personnel into Site buildings. A makeshift set of skateboard ramps, extensive graffiti, and burned areas inside the buildings indicated that they had been entered repeatedly over a considerable length of time.

Information available in the MA DEP files, and observation of the "landfill" area, indicated that further sampling of surface soils may be necessary in order to determine whether levels of contaminants present in this unrestricted area directly adjacent to residences pose a direct contact threat.

## **C. Other Actions To-Date**

Subsequent to the PA/SI, EPA issued a closure memorandum on February 28, 2002, indicating that a removal action was warranted at the Site. On March 13, 2002, EPA sent a Notice of Potential Liability (Notice Letter) to the Temple Stuart Site owner informing him of his responsibility and inviting him to undertake the removal action under an EPA administrative order. On May 9, 2002, EPA sent a followup letter to the site owner, stating that the company's response to the Notice Letter continued to be overdue. On May 16, 2002, private counsel for the site owner left a telephone message for EPA Enforcement Counsel regarding the owner's inability to pay for the cleanup, but did not discuss site access in the message, nor did he ever provide a written access agreement. EPA subsequently received a letter dated May 29, 2002, from the owner's law firm, stating that the firm no longer represented the site owner, referring all future correspondence to the owner's in-house attorney.

On July 8, 2002, the Emergency Planning & Response Branch Chief signed an administrative order for property access. The site owner's representative signed it on July 15, 2002.

On July 22, 2002, Acting OSRR Director Richard Cavagnero signed the Action Memorandum which documented known site conditions and specified potential cleanup actions. After mobilization, the OSC more closely investigated conditions at the Site, which included finding more extensive deterioration of the buildings than had previously been observed. This necessitated more demolition than had originally been anticipated. The OSC prepared Action Memo Addendum #1, increasing the Removal Scope of Work and the project ceiling.

On August 20, 2002, the Acting OSRR Director signed Action Memo Addendum #1.

#### **IV. RESPONSE INFORMATION**

##### **A. Situation**

##### **1. Current Situation**

The current situation is as described above. The EPA Removal Action is ongoing.

##### **2. Removal Activities to-Date**

Preparation for asbestos removal began on August 22, 2002, with actual removal beginning on August 28, 2002. To date, approximately 250 bags and 35 fiber drums of asbestos-containing material (ACM) have been removed and stored on-site in a lined, secured and posted trailer.

Demolition of the boiler room and adjacent "lathe room" began on September 23, 2002, and should be complete by October 3, 2002.

#### July 2002

- Met with State, town representatives to describe work planned and set up appropriate contacts.
- Performed site walk with State senator, EPA and Town representatives, cleanup contractor, and press representative.
- Inspected portions of site interior buildings with response manager and civil engineer. Buildings have deteriorated significantly since the Removal Site Evaluation in November 2001. Demolition of many areas of the site buildings will be necessary to perform the asbestos abatement.

#### August 2002

- Performed further structural evaluation of site building areas.
- Secured and posted site.

- Bid and awarded subcontract for asbestos abatement.
- Met with MA DEP representatives to discuss changes in site conditions and planned removal actions.
- Initiated asbestos removal activities. First floor of “lathe room” complete.
- START performed perimeter monitoring during asbestos removal.
- Held public involvement session, with Town and State officials attending. EPA Public Affairs assisted by expediting preparation of site fact sheet.
- Initiated after-hours police security due to continued trespassing noted in extremely dangerous building areas.

### September 2002

- Asbestos removal began on piping, new boiler in boiler room. START continued to perform perimeter monitoring during asbestos removal. All perimeter samples are being provided to MA DEP; all sample results have been acceptable.
- EPA performed bulk asbestos sampling of accessible suspect material throughout site. Almost all samples were clean, with exception of friable material found protruding from boiler casing.
- The OSC held many discussions with representatives of the site owner about removing large paper machine stored on the first floor of the former “sanding department” in Building A.
- Removal of asbestos from first floor of “sanding department” in Building A completed.
- Removal of boiler casing begun. Subcontractor’s failure to take reasonable precautions to secure boiler’s structural integrity during removal of friable asbestos from boiler and firebox casing resulted in a physically hazardous condition. All asbestos abatement was halted at the direction of the Response Manager.
- Due to hazardous condition of boiler room, site security hours were extended.
- The OSC held a meeting with representatives of MA DEP and MA Department of Occupational Safety to discuss site hazard issues, and future work practices and waste segregation. The OSC will confirm our discussion with a brief letter to each agency.
- Demolition of boiler room and rigging out of cleaned boilers completed.
- “Lathe room” portion of Building A demolished.

### **B. Planned Removal Activities**

Further removal activities planned include:

- Planning and implementing demolition, waste segregation and proper disposal of remaining site buildings containing friable asbestos
- Continued consultation with the Town of Templeton public safety officials to plan securing of affected Site areas, and minimizing the potential for unauthorized access to these areas. This may require the continued provision of after-hours security.
- Conduct air monitoring as necessary during demolition activities.
- Investigate and stabilize containers found to contain hazardous materials.
- Investigate surface soil conditions and any associated contamination in the former landfill

- area; perform excavation and removal of soil material if necessary.
- Coordinate with MA DEP on any actions required under the Clean Water Act and the Oil Pollution Act.
- Assess and characterize any additional hazardous materials discovered during the course of this action.
- Conclude removal actions; perform any necessary and appropriate Site restoration, and demobilize.

**V. COST INFORMATION**

	<u>CEILING</u>	<u>SPENT</u>	<u>REMAINDER</u>
<b>ERRS Costs</b> ("Committed") costs as of 9/17/02	\$1,100,000	\$123,389	\$976,611
<b>START</b> (as of 9/20/02)	<u>\$ 100,000</u>	<u>\$ 20,744</u>	<u>\$ 79,256</u>
<b>Extramural Subtotal</b>	\$1,200,000		
<b>20% Contingency</b>	<u>\$ 240,000</u>	<u>\$ 0</u>	<u>\$ 240,000</u>
<b>Extramural Total</b>	\$1,440,000		
<b>EPA Regional Personnel</b> (estimated as of 9/27/02)	<u>\$ 125,000</u>	<u>\$ 25,000</u>	<u>\$100,000</u>
<b>Total Project Ceiling</b>	<b>\$ \$1,565,000</b>	<b>\$ 169,133</b>	<b>\$ 1,395,867</b>

The above 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.

**CASE PENDING**