

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Fay Street Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region I

**Subject:** POLREP #2  
Fay Street Site  
  
Lowell, MA  
Latitude: 42.6233265 Longitude: -71.3042681

**To:**  
**From:** Elsbeth Hearn, OSC - Environmental Engineer  
**Date:** 10/8/2014  
**Reporting Period:** 7/24/2014 - 10/17/2014

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	01LH	<b>Contract Number:</b>	EP-W-08-061 TO #0062
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	8/21/2014
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	7/17/2014	<b>Start Date:</b>	7/17/2014
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	MAN000106163	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Time-Critical Removal Action

#### 1.1.2 Site Description

Refer to the Initial Polrep for more detailed information about Site Description.

The site is comprised of three residential parcels surrounding 86 Fay Street. These three lots consist of the Swede Village Condominium Complex (106 Lundburg Street), a single family residence (74 Fay Street), and an empty lot that is owned by the same owner of the single family residence (78 Fay Street).

##### 1.1.2.1 Location

The Site is located at properties along Fay Street and Lundburg Street in Lowell, MA.

##### 1.1.2.2 Description of Threat

Refer to the Initial Polrep for more detailed information on the description of threat.

From the 1800s through the early 1900s, areas of the site were reportedly utilized as a dumping ground for ash from the Middlesex North Agricultural Fairgrounds. Heavy metals such as lead and arsenic, and polycyclic-aromatic hydrocarbons (PAHs) are present in the ash and pose a threat to the local population.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Refer to the Initial Polrep for more detailed information on the Preliminary Assessment and Site Inspection Results.

Since the initial PASI, more extensive sampling at the site has shown that contaminated soil extends much farther onto the properties than originally determined. This was part of the reason for the request for a ceiling increase in the August 2014 Action Memo Amendment.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

ERRS began excavation activities on 24 July 2014 at the Fay Street Properties. Approximately 3 feet of soil was removed from the entire excavation area, except for a portion of the area under a 150-year old maple tree under which 1.5 feet of soil was removed from roots. This excavation was performed with a powerful vacuum truck that allowed excavation to proceed while leaving the roots undisturbed. Excavation activities on this property were completed at the end of August and restoration activities began in September. The city right of way along Fay Street was included in the area excavated.

On 22 September 2014 excavation activities began on 106 Lundburg Street Property and have continued since. All soil is awaiting transportation and disposal approvals that are ongoing.

#### 2.1.2 Response Actions to Date

EPA has conducted removal assessment events in July 2013, June 2014, and again in early July 2014 to determine the extent of contamination at the Site. No removal activities have begun to date but are scheduled to begin on 23 July 2014.

EPA has organized two public meetings for the impacted community. One was held in December 2013 and the second, a community meeting for the Swede Village residents, was held on 14 July 2014. The July meeting addressed the concerns of the residents as removal activities begin.

EPA & EPA ERRS & START contractors mobilized to the Site in July and have completed excavating contaminated soil on one residential property that consists of two parcels. Excavation began on the second property (Swede Village Condominiums) in September.

- Preparation of 86 Fay Street & surrounding properties for excavation and staging activities (re-grading parts of 86 Fay Street, moving of saplings planted by the city, delivery of office trailer & storage box & dumpster & equipment, removing of fence along property lines, installing temporary fence along property line of O'Donnell Field, preparing the lay-down staging area for contaminated soil stockpile);
- Excavation and installation of permeable soil cap with warning layer at 74 & 78 Fay Street;
- Excavation of city of Lowell right-of-way near Fay Street;
- Soil vacuuming around 150-year old Silver Maple Tree on 74 Fay Street;
- Installation of impenetrable geotextile around dripline of Maple tree;
- Determination that boundaries of contaminated soil extend into the city field adjacent to the property (work in this area will commence once Swede Village is complete). Trees and brush were cleared in preparation of this work;
- Backfill & topsoil & grading of 74 & 78 Fay Street;
- Hydro-seed of 74 & 78 Fay Street to begin restoration activities on these properties;
- Excavation activities at 106 Lundburg Street (Swede Village) began in September 2014;
- Excavation of areas behind the mailbox at Swede Village to 1 foot depth, and ash was discovered at depth in the area adjacent to the parking lot, so installation of permeable cap with warning layer was necessary at 3 feet bgs;
- Backfill, topsoil, grading, and hydroseed of area behind the mailboxes at Swede Village;
- Initiation of transportation & disposal process (soil is not permitted to go to certain landfills as daily cover due to the potential presence of ash - the initial pile of soil passed all TCLP sample results);
- Collaboration with engineers at Weston Solutions to develop a grading plan & engineered solution to slope management on the Swede Village Property. Final plan was stamped in October 2014;
- Collection and analysis of post-excavation samples for on-site analysis;
- Collection of air monitoring data utilizing the EPA VIPER telemetry system.

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

Access agreements have been distributed to all impacted parties.

Enforcement activities are ongoing.

#### 2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

- Removal activities will continue on the Swede Village Property;
- Excavation on the city field property is anticipated to begin once Swede Village Property is complete.
- Soil with contamination above a level of concern will be excavated and stockpiled;

- Stockpiled soil will be transported and disposed of offsite once approved at a landfill;
- A permeable soil cap will be placed over the excavated area if all contamination cannot be removed,;
- In areas under trees, a similar method of vacuuming the soil will be used with an impenetrable geotextile;
- Engineered grading & slope solution plan will be implemented;
- Work will begin at 106 Lundburg Street once the two Fay Street properties are completed;
- Each property will be restored.

#### **2.2.1.1 Planned Response Activities**

See "Anticipated Activities."

#### **2.2.1.2 Next Steps**

EPA will begin Transportation and Disposal activities in late October.

#### **2.2.2 Issues**

Excavation Issues:

The condominium complex located at 106 Lundburg Street will be a complicated excavation. A number of underground utilities are located adjacent to stand-alone condo buildings. Excavation will require small equipment and hand-digging to prevent damage to underground utilities and permanent structures.

Dust Control Issues:

EPA will continuously monitor for contaminated dust and employ dust control measures to ensure that no contamination leaves the site. Up to four (4) DataRAMs will be deployed surrounding excavation operations and the EPA VIPER system will be used to continuously monitor for dust. Dust monitoring operation concentrations were developed in conjunction with the Massachusetts Department of Public Health (MA DPH) and the Agency for Toxic Substances and Disease Registry (ATSDR).

### **2.3 Logistics Section**

ERRS equipment on-Site:

Cat 321C Excavator (1)  
 Skidsteer (1)  
 Mini excavator (1)  
 Dump Truck (1)  
 Pressure Washer (1 charged when used)  
 Generator (1)  
 Command Trailer (1)  
 Storage Container (1)  
 Personnel Trucks (1-2)

### **2.4 Finance Section**

No information available at this time.

### **2.5 Other Command Staff**

#### **2.5.1 Safety Officer**

The Site Safety Officer is the on-site OSC.

Daily safety meetings are conducted before commencement of work.

#### **2.5.2 Liaison Officer**

On-Scene Coordinator is working with coordinating agencies as necessary.

#### **2.5.3 Information Officer**

Community outreach is on-going. There have been two community meetings, and the On-Scene Coordinator in conjunction with the Community Involvement Coordinator are available to answer any community concerns. The community has been made aware that the EPA Command Post is open for community members to have their questions answered by the EPA OSC and contact information for all agencies has been made widely available.

## **3. Participating Entities**

### **3.1 Unified Command**

### **3.2 Cooperating Agencies**

- Massachusetts Department of Environmental Protection (MassDEP)
- Massachusetts Department of Public Health (MA DPH)
- Agency for Toxic Substances and Disease Registry (ATSDR)
- The City of Lowell

#### **4. Personnel On Site**

Personnel on-Site:

One (1) EPA OSC  
One to Five (1-5) ERRS  
One (1) START

#### **5. Definition of Terms**

EPA = U.S. Environmental Protection Agency  
MassDEP = Massachusetts Department of Environmental Protection  
MA DPH = Massachusetts Department of Public Health  
ATSDR = Agency for Toxic Substances and Disease Registry  
START = Superfund Technical Assistance Response Team (EPA Contractor)  
ERRS = Emergency & Rapid Response Services (EPA Contractor)  
PAH = Polycyclic Aromatic COmpounds  
bgs = Below ground surface

#### **6. Additional sources of information**

##### **6.1 Internet location of additional information/report**

[www.epasoc.org/faystreet](http://www.epasoc.org/faystreet)

##### **6.2 Reporting Schedule**

Polreps will be distributed every 1-2 months.

#### **7. Situational Reference Materials**

No information available at this time.