MASSDEP MONITORING CHECKLIST FOR CLOSURE ACTIVITIES AT GENERAL CHEMICAL CORP.

Date of inspection Aug 15 Inspector AL Nardone (Print name)

Arrival Time 2 PM Departure Time 5:40 PM

GCC's contact person for this date Steve Ganley (GCC) Bill Kenney (Prime Engineering)

List operations observed based on categories shown below:

5:40 PM Workers cleaning up - More sampling tomorrow.

Circle each observed work location(s)/process(es) and Check if any dust, odors or emissions are observed at the property fence-line.

	Visible Dust/Aerosols	Odors	Emissions at Fence-line	
Building No. 1:				
Scarification of floors				
N/A Power washing of walls & berms				
Building No. 2:				
Scarification of floors				
Power washing of walls & berms				
• Power washing ramp to Bldg #2			yes	- brief - see note 1.
Tank Farm:				
Power washing & cleaning of tank interiors				
Power washing secondary containment & floor				
Dismantling & removal				
Other power washing:				
Bulk tank truck loading/ unloading area				
Container loading/unloading area				

Scarifying loading ramp in front of Bldg No. 2 - (See text photo) Photos 4 & 5 2:30 PM Scarifying small containment area directly below former piping manifold. See photo 6

Building No.1-- PCB sampling/staging area/central storage bay:

PCB sampling conducted? Yes ____ No ✓

If yes, PCB sampling conducted according to Section IX, Attachment 6. of the Closure Plan ?

Yes _____ No _____

Notes: For any of the items circled above (except PCB sampling):

1) provide below (and on additional sheet if necessary) written details of your observations and any photos taken;
2) identify whether there is/was a need for MassDEP to require GCC to change the observed activity;
3) summarize discussions with facility contact person on the required action;
4) describe and summarize any corrective actions instituted by the facility; and
5) discuss the effectiveness of required corrective action(s)

Note 1 2:05PM PID alarm - workers simple green powerwashing nearby wall, Work stoped. They finished cleaning 1400ppbV. Tank farm sec. containment areas now cleaned - nothing to indicate any scarification or sampling conducted. Some small patches of sealant missing but cement underneath looks clean - Photos 7, 8 & 9 taken.

Note 2 Bldg No. 1 - PCB holding area - 10 grids 2 holes, 1 grid 3 holes, rest 1

Note 3 Bldg No. 1 3 - 1yd boxes "Concrete dust w lead" labeled H.W. Accum date 8-10-12
17-55 gal drums - Some labeled H.W. Looks like accumulated H.W from closure activities,
~~Provide a summary of any changes in GCC's work plan or schedule (i.e., change in work hours for the day or next day):~~

Note 4 Bldg. No. 1
Some drums labeled "PPE and Oily rust", Trichloro ethene/Speedi Solids 8-9-12.
"Oily Solids", "Metal Rust" 7-25-12, "Oily Floor sweepings" 7-25-12.

Note 5 Bldg No. 1 grids ~~2~~ 5'x5' - Some areas additionally scarified. Samples also taken each grid front 1/2 of the Bldg.

[See additional notes and photos page 5]

List all photos taken including short description/title for each (add additional lines/sheets as necessary).

Photo (1) samples to be taken
(2) at loading/unloading bulk rack
(3) also Prime taking sample 2:16PM
(4) Tent front of Bldg No. 2 & spots to scarify
(5) also
(6) small containment area being scarified

2.

(12) Bldg No. 1 Boxes and drums
Looking into bldg-rt side
(13) Looking into bldg center rear PCB holding area-marked w grid system - 5 boxes x 4 boxes

(14) Bldg No. 1 - left rear side
(15) Looking at left wall/floor

(16) Looking at right wall/floor
(17) Photo Boxes and drums in Bldg No. 1

Photo 2 (7) Photos of missing sealant in tank farm
Photo 3 (8)

(9)
(10) Debris still remaining behind tank farm
Looking toward rear fence.
(11) Looking other direction looks like they removed some soil.

Air Monitoring, all inspectors

1. Check to ensure that required air monitoring devices are in place (Y/N): Weather station: Y

Down-wind Fence-line PID: ___ (See Note 7) Mobile PID: ___ Three dust meters: ___

For Air Monitoring Staff inspectors:

1. Check readings on General Chemical and MassDEP PIDs on hourly basis and record below
2. Were any readings on General Chemical PIDs above 10 ppbv/v? Y (Y/N) See Note 1.
3. Were any readings on MassDEP PID above 0.1 ppmv/v? ___ (Y/N) N/A
4. On dates where SUMMA canisters are in place (expected to be 3 days only): N/A
   a. Check that one canister is upwind, and one canister is downwind:___ (Y/N)
   b. Check pressure in each canister on an hourly basis to monitor pressure drop and record below

GCC Down-wind Fence-line PID	Time	Measurement

GCC Mobile PID	Time	Measurement

MassDEP PID	Time	Measurement

Downwind SUMMA Canister	Time	Pressure Measurement

Downwind SUMMA Canister **Time** **Pressure measurement**

Inspector signature: Al Nardone Date Aug 15, 2012

FOLLOWUP INSTRUCTIONS FOR THE MORNING AFTER INSPECTION:

1. Scan your completed inspection form when you return to the office to create a PDF, and save it in this folder: Y:\Web_Share\General_Chemical_Reports. (See sample)
   Please use the subfolder for the date on which the inspection was done.

2. Upload/save any photos in this folder: Q:\BWP\General Chemical Cleaning. (See sample)
   Please use the subfolder for the date on which the photos were taken, and post the photos in the order in which you are listing them in your inspection report.

EMERGENCY CONTACTS AND PHONE NUMBERS

MASSDEP

Bill Sirull/MassDEP—Boston (617-292-5838)
Al Nardone/MassDEP---Boston (617-292-5580)

FRAMINGHAM FIRE DEPARTMENT

Chief Gary T. Daugherty, Framingham Fire Department (508-532-5930)
Deputy Chief John C. Magri, Framingham Fire Department (508-532-5930)

GENERAL CHEMICAL CORPORATION

(TBD), General Chemical Corporation (week of July 30)
Stephen Ganley, General Chemical Corporation (508-872-5000)
Michael Persico, General Chemical Corporation

(18) (19)
2 Pictures taken after scarification at former piping manifold.

(20) (21)
Bldg No. 2, scarified floor - note lower wall removal & totes fuel oil.

(22) (23)
2 pictures after scarification tent ramp to Bldg No. 2

Small pink stain to be scarfed or sampled.

(24) (25)
Picture of coring at loading/unloading dock shows 2 sizes of cornings. ~~Taken~~ Also, pic of cornings taken on small adjacent wall.

Note 6 "Muliple samples taken at Loading rack. Each sample too small so composited them. In total of 4 samples" per Prime rep.
Prime also sampling into left wall of this area.

Observed only very small amounts of dust per hole. Around 30-40 samples fills 1" dia test tube 1" deep.
I asked Prime rep. to document this in his report.

Note 7 Today's Air monitoring: East wall 2
2 = VOC monitor and particulate monitor

North, adj to Bldg No. 1 — 1 dust monitor
SW 2
South 2

Note 8 Additional scarification to remove stain residue under tent on ramp to Bldg No. 2 @ 4:20 PM - Additional cleaning - still red spots - may sample this - looks like a red dye.

Note 9 At former loading dock coring - some 1" dia & some 1/2 dia. Photo taken of this and wall.
4:50 PM - Prime & workers start sampling the wall to left of loading rack.