



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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June 21, 2012

Stephen M. Ganley, General Manager
General Chemical Corporation
133-138 Leland Street
Framingham, MA 01702

Dear Mr. Ganley:

By letter dated March 1, 2012, General Chemical Corporation (GCC) notified the Massachusetts Department of Environmental Protection (MassDEP) of its intent to close the licensed hazardous waste storage facility located at 133 Leland Street in Framingham, Massachusetts in accordance with the Massachusetts hazardous waste regulations, 310 CMR 30.000, and the closure plan incorporated into the GCC license.

In addition, GCC has submitted supplemental information providing additional detail regarding planned closure activities in a document titled "General Chemical Corporation, Facility Closure Plan, Hazardous Waste Management Facility, MA, License N0. 27B/2006." This document was initially submitted on May 25, 2012 and has been revised several times with the most recent version of the submittal dated June 14, 2012.

MassDEP has reviewed GCC's closure plan (Plan), the documents described above, other information provided by GCC in meetings, comments received from the Framingham Board of Health, Fire Department, School Department and other town officials as well as comments received from interested citizens in evaluating the proposed GCC Pilot Study (Pilot). Based on its review of all information available, MassDEP hereby authorizes GCC to proceed with the Pilot as described in the Plan scheduled for June 26, 2012 from 8:00 PM to about 12:00 AM in compliance with the requirements of the hazardous waste closure regulations, 310 CMR 30.580, GCC's hazardous waste facility license closure plan and the conditions and requirements listed below:

This information is available in alternate format. Call Michelle Waters-Ekanem, Diversity Director, at 617-292-5751. TDD# 1-866-539-7622 or 1-617-574-6868
MassDEP Website: www.mass.gov/dep

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1. Pilot cleaning and testing operations shall occur at Building No. 1 and Tank No.5.
2. Pilot cleaning and testing operations for Building No. 1 and Tank No. 5 shall not overlap so that emissions from each operation can be monitored separately.
3. Pilot cleaning and testing for Building No. 1 and Tank No. 5 shall include cleaning using Simple Green for the purpose of determining if the air monitoring system can detect 2-butoxyethanol (the constituent of concern in Simple Green).
4. GCC shall disable operation of all exhaust fans in Building No. 1 during the Pilot.
5. The Pilot shall generate information to demonstrate whether or not the power washing cleaning method will achieve the clean debris performance standard for concrete, i.e., removal of at least 0.6 cm of the surface layer and treatment to the clean debris standard. GCC may use other cleaning methods such as scarification as part of its Pilot and shall report the results as part of its final report (Report).
6. The Plan states that the weather station will be placed immediately outside Building No. 1. MassDEP requires that it be placed at a location(s) and height(s) near Building No.1 and Tank No. 5 that best reflects upwind and downwind conditions.
7. For VOC sampling, MassDEP requires that one summa canister be placed upwind of Building No. 1 and Tank No. 5 and a minimum of two canisters downwind, in locations most likely to capture building and tank emissions. Additionally, air sampling with a summa canister is required to be used within Building No. 1 and adjacent to Tank No. 5 during the Pilot to get worst case data which is GCC's stated objective for the Pilot. Exact locations of monitors shall be determined at the time of testing in consultation with MassDEP on-site staff.
8. Summa canisters shall be closed immediately upon completion of monitoring.
9. For dust monitoring, MassDEP requires that one Dustrak monitor be placed upwind of Building No. 1 and Tank No. 5 and a minimum of two dust monitors be placed downwind, in locations most likely to capture building and tank emissions. Additionally, one of the down-wind Dustrak monitoring points for Building No. 1 shall be co-located with the high volume particulate sampler adjacent to the door of Building No. 1. The upwind and downwind locations may otherwise be co-located with the VOC monitors. Exact locations shall be determined at the time of testing in consultation with MassDEP on-site staff.
10. In analyzing the VOC canisters via EPA Method TO-15, and the high-volume particulate

sampler via EPA Methods 8081, 8270, and 6200, GCC shall follow the procedures described in the MassDEP document, WSC #10-320, "The Compendium of Quality Assurance and Quality Control Requirements and Performance Standards for Selected Analytical Methods Used in Support of Response Actions for the Massachusetts Contingency Plan (MCP)". For EPA Methods TO-15 and 8270, this shall include the use of the full analyte lists and the reporting of Tentatively Identified Compounds, including 2-butoxyethanol (the constituent of concern in Simple Green) and any additional constituents that are not target analytes but have been identified as potential chemicals of concern at the facility.

11. GCC shall submit to MassDEP copies of the Total Ion Chromatograms for all VOC and Semi-VOC analyses (i.e., EPA Method TO)-15 and 8270 as part of the Report described in 12 below.
12. GCC shall submit a Report as soon as possible after June 26, but no later than July 13, 2012, which shall include, but not be limited to the following:
 - a. A description summarizing the work, activities and testing done during the Pilot including all information described in conditions 1-11 above.
 - b. A description of any deviations from the Plan and this authorization to proceed with the Pilot.
 - c. Methods and results of testing.
 - d. Conclusions from the Pilot and recommendations for future cleaning and monitoring.
 - e. Copies of all laboratory analytical reports from the testing and shipping documents for all wastes generated during the pilot.

GCC shall submit the Report via email as a PDF document to Al Nardone in MassDEP's Boston Office and to John Fitzgerald in MassDEP's Northeast Regional Office.

If you have any questions, please contact Al Nardone of my staff at 617-292-5880.

Sincerely,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

Steven A. DeGabriele
Director, Business Compliance Division
Bureau of Waste Prevention

CERTIFIED MAIL No. :

Ecc: Al Nardone, BWP/Boston
Bill Sirull, BWP/Boston
John Fitzgerald, NERO
Laurel MacKay, OGC/Boston
Robert W. Ritchie, OGC/Boston

Robert Halpin, Town Manager
Ethan Mascoop, Framingham BOH
Michael Hugo, Framingham BOH
Steven Hiersche, Framingham School Department
Matt Torti, Framingham School Department
Beverly Hugo, Framingham School Committee
Christopher J. Petrini, Framingham Town Counsel
Gary Daugherty, Chief, Framingham Fire Department
John Magri, Assistant Chief, Framingham fire department
Roger Demler, Sherborn Groundwater Protection
Robin Welch, Principal, Woodrow Wilson School

Michael Persico, President, GCC
Stephen E. Pozner, Pozitive Environmental Solutions, Inc.
Robert S. Rego, P.E./ Prime Engineering, Inc.