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Update #2 – MassDEP’s South Framingham Initiative – March 31, 2016

As you know, MassDEP is conducting an initiative to help improve environmental quality in South Framingham. This is the second Update of MassDEP’s efforts; Update #1 was sent on October 15, 2015.

MassDEP Web Page for South Framingham

MassDEP has created a web page specific to our activities in South Framingham, where information and photos about all of our activities in South Framingham can be found in one place. The web page can be accessed at: <http://www.mass.gov/eea/agencies/massdep/service/justice/south-framingham/>

South Framingham Compliance Assistance Day – October 28, 2015

In Update #1, MassDEP informed you that we were planning a “compliance assistance day” for local businesses in South Framingham. Nearly 100 businesses in the South Framingham area are registered with MassDEP as being subject to Hazardous Waste regulations, Air Quality regulations, and/or other regulatory programs. About 85 of these businesses generate small volumes of waste oil and/or other hazardous wastes as part of their business activities. Most of these businesses are in the automotive repair or auto body sectors.

On October 28, 2015, MassDEP dispatched thirteen 2-person teams to South Framingham with the goal of visiting all of the businesses in the area that were registered with MassDEP. MassDEP visited approximately 90 businesses in total, providing each with a Compliance Assistance Guide created by MassDEP to help promote environmental compliance. The Guide outlines key steps for businesses to take to ensure compliance with the rules for managing hazardous waste, provides additional hazardous waste resources, and contains MassDEP contact information. The Guide was made available in English, Spanish and Portuguese. MassDEP staff noted any businesses that were closed or were no longer generating hazardous waste. Staff also visited other area businesses (which were not listed with MassDEP) that could potentially benefit from receiving the Guide. Area businesses were largely receptive to the outreach. MassDEP believes that this compliance assistance effort provided some key compliance information, resources and MassDEP contact information to the businesses in South Framingham.

A future, more detailed update on the results and recommendations from our compliance assistance efforts will be provided on MassDEP's web page cited above.

Waste Site Cleanup Program

The Waste Site Cleanup program's approach for improving environmental quality is South Framingham is two-fold:

1. *Continue our direct involvement in several large waste sites in the area:*
 - a. the now-closed General Chemical facility on Leland Street;
 - b. the Mary Dennison Park on Beaver Street, which was constructed on a former dump used by the Town of Framingham and Dennison Manufacturing Company; and
 - c. the former Commonwealth Gas manufactured gas plant (MGP) site located at 350 Irving Street.
2. *Evaluate other sites in South Framingham with the potential to impact Beaver Dam Brook.* This effort will involve screening the Waste Site Cleanup files for sites reported to MassDEP for having releases of oil or hazardous materials, and identifying any of those sites with potential impacts to Beaver Dam Brook.

Updates on General Chemical, Mary Dennison Park, and the former Commonwealth Gas sites

General Chemical Site – In November, 2015, the environmental consultants for General Chemical submitted their report on some supplemental site assessment activities required by MassDEP to complete their Comprehensive Site Assessment. The report was placed in the Framingham Public Library, the Public Health Office at the Memorial Building, and is electronically available at MassDEP's on-line file viewer at <http://public.dep.state.ma.us/fileviewer/Rtn.aspx?rtn=3-0019174>.

Also in November, 2015, the semi-annual monitoring program that is required as part of the Administrative Consent Order between MassDEP and General Chemical/Trinity General was conducted. The Fall 2015 monitoring report was filed with MassDEP on January 11, 2016, and that report is also available for public review at MassDEP's on-line file viewer.

MassDEP conducted a second round of private well testing in Sherborn in November, 2015, at the request of the Sherborn Board of Selectmen. Fourteen private wells were tested due to concerns that the contamination from the General Chemical site could be reaching the residential locations in Sherborn where the water supply for the home is a private well. The results showed that no contaminants were detected above 1 part per billion, and none of the wells had the chemical 1,4-dioxane which had been detected in 2 wells during the initial well testing in 2012. The Town of Sherborn continues to be concerned about the General Chemical site and has asked MassDEP to attend a Board of Selectmen's meeting on March 31 to discuss the matter.

Last, a major milestone for the General Chemical site since the last update is the submittal of a proposed cleanup plan by the environmental consultants working for General Chemical. A public meeting will be held on April 14 for General Chemical's Licensed Site Professional to present the proposed cleanup plan, and to begin the public comment period on the draft plan.

Mary Dennison Park - In November, 2015, the cleanup of two areas of surface soil contamination at Mary Dennison Park took place. The two locations had lead concentrations that warranted a quicker cleanup than the rest of the park. The cleanup was a joint effort between the Town of Framingham and Avery Dennison Corporation. The next milestone in the cleanup and rehabilitation of the park is the Comprehensive Site Assessment. MassDEP expects to receive the scope of work in the near future for that step in the waste site cleanup process.

Former Commonwealth Gas site – MassDEP has required Eversource to submit a Revised Comprehensive Site Assessment by September 2016. The field work to support the Revised Comprehensive Site Assessment began in November 2015 with the testing of abutting properties to determine how far contaminants from the former manufactured gas operations may have spread onto the abutting properties. Further testing on both the 350 Irving Street property and abutting properties was started the week of February 29, 2016, and is expected to extend into April. MassDEP provided comments to the Town of Framingham associated with Notices of Intent submitted to the local Conservation Commission for the proposed site assessment activities. Signs have also been posted around the 350 Irving Street property saying, “No Trespassing – MassDEP Disposal Site RTN 3-589 – Further Information Call (800) 592-2000 – Eversource”.

Concurrently, MassDEP staff have reviewed a plan for remedial activities associated with: 1) the removal of the contents from a former tar well; 2) the construction of a permanent bridge support over an MWRA emergency water supply aqueduct that bisects the Site; and 3) the re-location of an active natural gas line currently located on a portion of the Site. The remedial work began the week of March 28, 2016 and is expected to take approximately 6 weeks. MassDEP staff will be on-site at the initiation of the former tar well cleanup to collect ambient air samples and analyze them in our lab. MassDEP staff will be conducting periodic Site visits in the upcoming weeks to observe the ongoing assessment and remedial activities at the Site. During the first day of excavations, a previously unmarked and unknown gas line was struck by the excavation crew requiring the evacuation of local businesses within the immediate vicinity. The gas line was successfully capped and excavation activities resumed the following morning.

Evaluation of other waste sites in South Framingham

At the time when the South Framingham project began, MassDEP had received notification of 148 locations where oil or hazardous materials had been found within South Framingham. MassDEP’s goal is to prioritize any sites where activities could adversely impact Beaver Dam Brook. In order to prioritize sites with potential impacts to Beaver Dam Brook, the locations within 1000 feet of the brook were identified using Geographic Information Systems mapping. The mapping, in conjunction with reviewing reports in MassDEP files, identified 63 locations or sites which have been prioritized for more detailed review.

Approximately 75% (48) of the 63 sites within the Beaver Dam Brook study area are considered “closed” in the Waste Site Cleanup program with either a Permanent Solution with no restrictions (43 sites), or a Permanent Solution with an “Activity and Use Limitation”. An Activity and Use Limitation is a deed notice that is used when there are levels of oil or hazardous material left at the site and where certain activities and/or uses must be restricted to ensure there are no risks from the remaining contaminants. In addition to the 48 closed sites, studies at four other sites have concluded that the contamination found on the property is from another nearby site, and four more sites are being actively cleaned up and

monitored but have not completed their cleanup yet. The remaining 7 sites have been discovered more recently, and are still in the assessment phase of the waste site cleanup process.

The following information and data for each of the 63 sites near Beaver Dam Brook in South Framingham are being compiled in a database:

- location
- distance to Beaver Dam Brook
- type(s) and concentrations of contamination
- whether contaminant types bioaccumulate
- surface water and sediment sampling data
- human health and ecological risk conclusions
- compliance issues

This information will be used to make decisions regarding the likelihood of contamination reaching Beaver Dam Brook, and to make recommendations for follow-up.

To date, 35 of the 63 sites closest to Beaver Dam Brook have undergone a preliminary review. No significant noncompliance has been identified from the reviews so far. A few sites have recommendations for inspections or other follow-up.

Discussion: Most of the sites reviewed have petroleum-related spills and have been cleaned up. Petroleum is not considered a persistent chemical because it biodegrades in the environment. The closed petroleum sites are not expected to present a long-term environmental threat to Beaver Dam Brook. Also, MassDEP's review found that many sites are either a significant distance away from the brook or have documentation that migration of contaminants has decreased to negligible levels close to the brook. A few sites have more persistent chemicals, including metals and polycyclic aromatic hydrocarbons (PAHs). Sites with polychlorinated biphenyls (PCBs) or pesticides have not been identified.

The two sites with the greatest potential to impact the brook (one of which has already been shown to have impacts to the Brook) have been identified and are sites that MassDEP has already assigned to staff to oversee: the former Commonwealth Gas site and Mary Dennison Park. Another site in the area has been assigned for a MassDEP audit.

Next Steps: The primary goal is to complete a preliminary review on the remaining sites and make recommendations for follow-up activities. Additional research regarding historical manufacturing business in the study area is recommended, with a focus on those industries that could have impacted the brook in the past.