



Department of Environmental Protection

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This Update of MassDEP activities in Southeast Framingham is being forwarded to the Public Involvement mailing list for the General Chemical site to keep you informed of actions that have been taken since the last Update on General Chemical that was sent to you on March 24, 2017.

Update #4 – MassDEP’s South Framingham Initiative – August 7, 2017

MassDEP is devoting significant staff time to help improve environmental quality in South Framingham. This is the fourth update of MassDEP’s work in this area of town. Update #3 was sent on February 9, 2017. At this point, MassDEP’s efforts are focused on ensuring the assessment and cleanup of several large, historic waste sites in South Framingham.

Waste Site Cleanup Program

The MassDEP Waste Site Cleanup program has focused its efforts on improving environmental quality in South Framingham on three particular sites:

- 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 site located at 350 Irving Street.

Former General Chemical facility, Leland Street – In a March 24, 2017 email to the Public Involvement mailing list for the General Chemical site, MassDEP alerted the public that General Chemical would not be conducting any further assessment or cleanup actions at their site. An attorney representing General Chemical had informed MassDEP on March 7, 2017 that General Chemical had spent down almost all of its “operating budget,” and would not be able to conduct any further work at the site.

As a result of that development, MassDEP has taken the following actions:

- MassDEP has secured the funds of the Financial Assurance Mechanism (FAM) that was established for this site. A letter of credit in the amount of \$1.85 million was secured and deposited in an account for use by MassDEP to conduct cleanup actions and monitoring activities. However, even though it is a significant amount of money, it is substantially less than

the cost estimated by General Chemical's Licensed Site Professional to adequately clean up the entire site.

- MassDEP has procured the services of a State contractor to conduct site monitoring and cleanup activities. The company that was selected is CB&I, a national company with a local office in Canton, MA (for more information about CB&I, see <http://www.cbi.com/Home and the attached> "General Statement of Qualifications").
- Concurrent with securing the FAM, MassDEP and the Office of the Attorney General are investigating whether there are any corporate entities with ties to General Chemical and/or Trinity General with assets that could be obtained for the cleanup work. The Attorney General's office has also agreed to review available financial records of General Chemical or any associated company that may have liability.
- MassDEP has reached out to the Environmental Protection Agency to see what resources they may have that can be brought to bear. We have contacted EPA's remediation experts at their National Risk Management Research Laboratory, Groundwater and Ecosystems Restoration Division in Ada, Oklahoma to solicit their opinion on cleanup options in light of a more limited cleanup budget. We have also met with EPA's Region 1 staff to discuss the possibility of the General Chemical site qualifying for the National Priorities List (NPL), aka "Superfund." Listing the site on the NPL would qualify the site for federal resources to address the cleanup needed at the site. EPA Region 1 agreed to review the information available for this site and, by the Fall of 2017, provide MassDEP with their preliminary opinion of whether the site is a viable candidate for the NPL. EPA Region 1 also indicated to MassDEP that conducting a partial cleanup in advance of an NPL listing may affect its qualification for the Superfund program. MassDEP expects to receive further clarification on this issue when EPA provides its preliminary opinion of the site being a candidate for the NPL.
- After obtaining access agreements with various property owners, the semi-annual sampling of groundwater and surface water locations was conducted by MassDEP's contractors, CB&I, from July 17-20, 2017. Results of this sampling round should be available in mid-to-late-August.

MassDEP has re-evaluated the draft cleanup plan that was submitted by General Chemical, and has determined that a thermal remedial approach at the General Chemical property where most of the contaminant "source" is located would be the most effective cleanup option. MassDEP will assign CB&I to further explore a thermal treatment remedy to confirm its applicability to the site. The timing of CB&I's assignment and proceeding with cleanup will be affected by the input received from EPA Region 1 this upcoming Fall. Some of the available funding will also be used to continue the semi-annual monitoring of groundwater and surface water. Once we have a specific plan of action, there will be an opportunity for public comment on the plan. In the interim, please contact MassDEP project manager Rodene Lamkin (rodene.lamkin@state.ma.us) or Steve Johnson (stephen.johnson@state.ma.us) for more information on this site.

All reports and other submittals from General Chemical can be viewed on MassDEP's on-line file viewer for Release Tracking Number 3-19174. The link for MassDEP's files is http://public.dep.state.ma.us/wsc_viewer/main.aspx.

Mary Dennison Park, Beaver Street – The next milestone in the eventual restoration of Mary Dennison Park is completion of what is called a Comprehensive Site Assessment, which is due in February 2018. While a significant amount of testing has been conducted at the park over the past two years, the Comprehensive Site Assessment will include the results of certain tasks that were not initially conducted, and expand on some of the testing that has been completed already. A memorandum was submitted by the Licensed Site Professional via email on March 17, 2017 summarizing the preliminary results of the assessment conducted in the Fall of 2016. The results include the following findings:

- *Delineation of the boundaries of past waste disposal*; 21 test pits were excavated along the north, northwest, and northeast park boundary in October 2016. Visual and analytical results indicate the need for off-property assessment, including residential properties on Beaver Street and Morton Street.
- *Additional soil testing*; additional soil testing was conducted in areas of the park that have had limited testing, like the embankment to Beaver Dam Brook. Nine borings were completed along the embankment in October 2016, with results consistent with previously collected data. An additional 34 shallow (0-3 feet) soil samples were also collected across the park to fill in data gaps. Measurements of lead concentrations using X-ray fluorescence have identified additional areas that require testing. This work will be conducted in August 2017.
- *Surface water and sediment testing in Beaver Dam Brook*; additional surface water samples were collected in October 2016 and additional sediment samples (0-6 inches) were collected in November 2016. Based on the results, no additional surface water or sediment sampling is planned. MassDEP's Office of Research & Standards is currently reviewing the data.
- *Additional groundwater testing*; additional groundwater samples were collected in October 2016. Based on the results, no additional groundwater sampling is planned.
- *Assessment of the utilities that run beneath the park*; soil samples adjacent to utilities and water samples from within the drain lines were collected in October 2016.

Additional activities that have taken place at Mary Dennison Park since MassDEP's February, 2017 Update include:

- Quarterly inspection reports for the Eastern Playground continue to be submitted to ensure that cover materials within the playground remain intact.
- A draft Scope of Work for a complete Risk Characterization of the site was submitted via email on July 13, 2017. MassDEP is reviewing the submittal, with input from our Office of Research & Standards.
- MassDEP provided comments to Avery Dennison and the Town of Framingham on a draft proposal for testing beyond the park property boundary. MassDEP anticipates receiving an updated testing plan in the near future.

The majority of testing outlined in the Comprehensive Site Assessment Scope of Work has been completed. Upon receipt of additional information to resolve any remaining questions, and input from our Office of Research & Standards, MassDEP will be providing Avery Dennison and the Town of Framingham with comments to assist in the completion of the Comprehensive Site Assessment for Mary

Dennison Park. The Comprehensive Site Assessment cannot be completed until testing is conducted on neighboring properties to determine if landfill wastes extend beyond the park property boundary. Once the Comprehensive Site Assessment is completed, a cleanup plan (called a Remedial Action Plan) can be developed.

The reports and correspondence for this site can be found on MassDEP's on-line file viewer for Release Tracking Number 3-32015.

Former Commonwealth Gas site, 350 Irving Street – Since the last Update, Eversource and its environmental consultants proceeded with a cleanup of asbestos-containing materials, PCB-contaminated soils, a new area where tar was identified on the ground surface, and MassDEP has completed its audit of a Revised Phase II Comprehensive Site Assessment for the 350 Irving Street site.

- *Asbestos*: During site inspections conducted by MassDEP, an area of surficial asbestos-containing materials was identified in the wooded area of the northern portion of the 350 Irving Street property. MassDEP directed Eversource to remove the surficial asbestos-containing material, which was done on April 13, 2017. Seven bags of asbestos-containing material and one partially-filled 55-gallon drum were shipped to an off-site disposal facility.
- *PCB Cleanup*: In May, 2017, Eversource began to excavate PCB-contaminated soils from a wooded area on the southeastern portion of the 350 Irving Street property. Two containers of PCB-contaminated soil were removed from the site on May 9 & 10, 2017, and additional soil that was initially stockpiled was also subsequently removed. Based upon confirmatory sampling results, the initial excavation efforts did not remove all the PCB-contaminated soil, and additional work is necessary. Access to the area will continue to be restricted by temporary fencing until the work can be conducted. If the additional soil removal is unable to proceed this summer, the excavation will be backfilled and additional work will likely be completed in conjunction with the future cleanup of the southern wetlands.
- *Tar seep*: On June 14, 2017, a new tar seep was observed on the ground surface of a portion of the site where Landscape Depot operates. Eversource provided a description of the tar seep to MassDEP on June 22, 2017. The surficial tar has been removed, and access to that area remains restricted. Tar seeps on the Wellesley Trucking property also recurred with the onset of the warm weather. Eversource has instituted a program of weekly inspections to identify and immediately address any further tar seeps on the property.
- *MassDEP Audit*: On June 16, 2017, MassDEP issued a Notice of Audit Findings to Eversource Energy. This Notice documented MassDEP's review of a Revised Phase II Comprehensive Site Assessment that documented the following work conducted since the Fall of 2015: additional testing of soil, groundwater, surface water and sediments; additional investigations of underground pipes and other infrastructure that had been left after the manufactured gas plant closed; gauging and recovery of separate phase oils; additional testing in the mulch storage yard; a revised risk assessment; and additional investigation of a former underground tar holder. Despite the considerable amount of testing at the 350 Irving Street site, MassDEP disagreed with a number of interpretations of the site data by Eversource's environmental consultants. As a result, MassDEP required Eversource to submit an Audit Follow-up Plan which

will address MassDEP's audit findings. To help resolve some of the disagreements in the data interpretations, MassDEP will be meeting with Eversource and its consultants in August, 2017.

Last, in July, 2017, Eversource posted multi-lingual signs (English, Spanish and Portuguese) around the perimeter of the 350 Irving Street property, along the Sudbury Aqueduct, and on the temporary fencing around the PCB soil excavation in the southern wooded area, to inform trespassers and other members of the public that hazardous materials are present at the site.

The PCB cleanup plan, MasDEP's Notice of Audit Findings, and the other submittals referenced above for the 350 Irving Street site can be found on MassDEP's on-line file viewer for Release Tracking Number 3-0589.

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