

CREATIVE PACKAGING AND PAPER SITE
(Site Identification Code – 01LB)

REMOVAL ACTION
ADMINISTRATIVE RECORD FILE

AND

INDEX

Prepared For:

U.S. Environmental Protection Agency
Region I
Emergency Planning and Response Branch
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912

CONTRACT NO. EP-W-05-042

TDD NO. 01-13-07-0003

TASK NO. 0894

DC NO. R-7487

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September 2013

INTRODUCTION

This document is the Index to the Administrative Record File for the Creative Packaging and Paper Site Removal Action. The Index cites site-specific documents and guidance documents used by U.S. Environmental Protection Agency (EPA) staff in selecting a removal action at the site. The removal action will protect public health, welfare, and the environment by removing hazardous substances, such as asbestos-containing material (ACM), and ignitable, corrosive, and reactive chemicals, from the Site. At this time, it does not appear that there is a viable potentially responsible party (PRP) to conduct the removal action; therefore, the removal is proceeding as a Fund-lead action. Activities under the removal action include the following:

- Conducting a site walk with the environmental remediation contractor and structural engineer to assess the structural safety layout of the Site, and to determine required equipment, personnel, and utilities.
- Developing and implementing a site-specific Health and Safety Plan (HASP).
- Developing a site-specific work plan providing estimates of materials, time, and costs.
- Providing site security as necessary.
- Mobilizing personnel and equipment.
- Delineating work zones and decontamination area.
- Performing air monitoring at the perimeter of the Site throughout invasive site activities.
- Sampling, bulking or overpacking, and staging containers and materials already identified through inventory.
- Pumping out the contaminants from any vats or tanks; and then neutralizing, cleaning, and disabling those containers so they are no longer usable.
- Removing and disposing of identified drums, containers, and ACM.
- Performing any additional sampling, analysis, characterization, neutralization, bulking or overpacking, and removal of hazardous substances as deemed necessary by the On-Scene Coordinator (OSC).
- Identifying and characterizing wastestreams, and developing waste disposal profiles.
- Providing transportation and disposal of hazardous substances to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)-approved off-site disposal and recycling facilities in a safe and as cost-effective a manner as possible.
- Repairing response-related damages.
- Demobilizing resources.

The Administrative Record File is available for public review, by appointment, at the U.S. EPA Records Center, 5 Post Office Square, Suite 100, Boston, Massachusetts, 02109-3912; and at the Worcester Public Library, 3 Salem Square, Worcester, Massachusetts, 01608. Questions concerning the Administrative Record File should be addressed to Allen Jarrell, EPA On-Scene Coordinator.

The Administrative Record File is required by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9613 (k), and EPA's implementing regulations, 40 CFR § 300.800.-825.

PLEASE NOTE:

THE DOCUMENTS COMPILED IN THIS ADMINISTRATIVE RECORD FILE HAVE BEEN REPRODUCED FROM THE BEST AVAILABLE COPIES, OR AS PROVIDED IN ELECTRONIC FILES.

SITE-SPECIFIC DOCUMENTS

ADMINISTRATIVE RECORD FILE INDEX

for the

Creative Packaging and Paper Site Removal Action

REMOVAL

Correspondence (Site File 2.01)

1. Letter from Mary Gardner, Deputy Regional Director, Massachusetts Department of Environmental Protection (MassDEP), to US EPA Region 1, Attn: Allan Jarrell, On-Scene Coordinator, regarding Former Creative Paper, 175 James Street, Worcester, MA, and requesting EPA's assistance at the site, dated/signed 29 March 2013.
2. Memorandum from Allen K. Jarrell, On-Scene Coordinator, Emergency Response and Removal Section I, Emergency Planning and Response Branch (EPRB), Office of Site Remediation and Restoration (OSRR), EPA Region I, through David McIntyre, Chief, Emergency Response and Removal Section I, EPRB, OSRR, EPA Region I, to the Creative Packaging and Paper Site File, regarding the Site Investigation Closure at the Creative Packaging and Paper Site, 261 Clover Street, Worcester, MA, dated 15 July 2013.

Removal Reports (Site File 2.02)

3. "Removal Program Preliminary Assessment/Site Investigation Report for the Creative Packaging and Paper Site, Worcester, Worcester County, Massachusetts, 27 February and 18 Through 20 March 2013", prepared by Weston Solutions, Inc., Superfund Technical Assessment and Response Team III (START), for EPA Region I, dated June 2013.

Action Memorandum (Site File 2.09)

4. Memorandum from Allen K. Jarrell, On-Scene Coordinator, Emergency Response and Removal Section I, EPA Region I, through David McIntyre, Chief, Emergency Response and Removal Section I, and Stanley Chin, Acting Chief, Emergency Planning & Response Branch, EPA Region I, to James T. Owens III, Director, Office of Site Remediation and Restoration, EPA Region I, regarding a Request for a Removal Action at the Creative Packaging and Paper Site, Worcester, Worcester County, Massachusetts, dated 17 July 2013, and signed by James T. Owens, III, on 18 July 2013. (The Enforcement Section of the Memorandum is withheld as being CONFIDENTIAL.)

POTENTIALLY RESPONSIBLE PARTY (PRP)

PRP-Specific Documents (Site File 11.09)

5. Letter from Stanley D. Chin, Acting Chief, Emergency Planning and Response Branch, EPA Region I, to Creative Paper, Inc., Creative Packaging, Inc., 175 James Street, Worcester, MA 01603, c/o James Hamilton, 2701 Mahogany Place, Palm Beach Gardens, FL 33418 and Richard Perlman, 300 2nd Avenue, Needham Heights, MA 02494, regarding Notice of Potential Liability and Invitation to Perform or Finance Proposed Cleanup Activities for the Creative Packaging and Paper Site, Worcester, MA, dated 22 July 2013.
6. Letter from Stanley D. Chin, Acting Chief, Emergency Planning and Response Branch, EPA Region I, to R&J Realty, LLP, 175 James Street, Worcester, MA 01603, c/o Nancy Hamilton, General Partner, 2701 Mahogany Place, Palm Beach Gardens, FL, 33418 and Sheila Perlman, General Partner, 300 2nd Avenue, Needham Heights, MA 02494, regarding Notice of Potential Liability and Invitation to Perform or Finance Proposed Cleanup Activities for the Creative Packaging and Paper Site, Worcester, MA, dated 22 July 2013.

COMMUNITY RELATIONS

News Clippings/Press Releases (Site File 13.03)

7. “Administrative Record File Available for the Creative Packaging and Paper Site Removal Action,” text of the display announcement as it was requested to appear in the *Telegram & Gazette*, Worcester, Massachusetts.

Please see the following website for more information regarding the Creative Packaging and Paper Site Removal Action:

<http://www.epaosc.org/creativepackagingandpaper>

SELECTED KEY GUIDANCE DOCUMENTS

EPA guidance documents may be reviewed at the U.S. EPA Records Center, 5 Post Office Square, Suite 100, Boston, Massachusetts.

1. Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. § 9601 et seq.
2. "National Oil and Hazardous Substances Pollution Contingency Plan," Code of Federal Regulations (Title 40, Part 300) 1990.
3. "Revised Guidance on Compiling Administrative Records for CERCLA Response Actions", U.S. EPA, Office of Site Remediation Enforcement, Office of Superfund Remediation and Technology Innovation, Office of Emergency Management, September 2010.
4. Superfund Amendments and Reauthorization Act of 1986.