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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
OFFICE OF SITE REMEDIATION AND RESTORATION  
SITE EVALUATION AND RESPONSE, SECTION II  
1 CONGRESS STREET  
SUITE 1100 - HBR  
BOSTON, MA 02114-2023

MEMORANDUM

DATE: February 27, 2003

SUBJ: Site Investigation Closure  
Coastal Metal Plating  
Merrimac, Massachusetts

FROM: Ted Bazenas, On-Scene Coordinator  
Site Evaluation & Response Section II

TO: Coastal Metal Plating Site File

THRU: Steven R. Novick, Section Chief  
Site Evaluation & Response Section II

In accordance with section 300.400 of the NCP, a Removal Site Evaluation, consisting of a file review, site visit and sample collection and analysis, has been undertaken for the Coastal Metal Plating Site in Merrimac, Massachusetts. Preliminary analysis has been received from the EPA New England Regional Laboratory. The findings of the Removal Site Evaluation, have been evaluated under the criteria set forth in section 300.415 of the NCP and section 104(a), (b) of CERCLA, 42 U.S.C. § 9604(a), (b). The Removal Site Evaluation has led to the determination that a Removal Action is appropriate at this time.

The findings of the Removal Site Evaluation are as follows:

1. Source and nature of the release or threat of release:

a. On February 13, 2003, a site visit to the facility revealed that all utility services had been discontinued. Plating baths containing cyanide solutions, extremely caustic solutions and extremely acidic solutions remain on the plating lines which have not operated in over 12 months. The building has no heat; plating baths and pipes are subject to freezing. The building has no fire suppression; the Merrimac Fire Department has expressed concern over the potential for an uncontrolled fire.

2. Evaluation of the threat to public health, welfare and the environment:



a. Federal Agency for Toxic Substances and Disease Registry:

Threat \_\_\_\_\_ No Threat \_\_\_\_\_ Evaluation  x   
Not Necessary

b. Endangerment to the ecosystem:

Threat \_\_\_\_\_ No Threat \_\_\_\_\_ Evaluation  x   
Not Necessary

3. **The Removal Site Evaluation was terminated pursuant to section 300.410(f) of the NCP for the following reason(s):**

- There is no release.
- The source is neither a "vessel" nor a "facility" as defined in section 300.5 of the NCP.
- The release involves neither a hazardous substance, nor a pollutant or contaminant that may present an imminent and substantial danger to public health or welfare.
- The amount, quantity, or concentration released does not warrant Federal response.
- The release consists of a situation specified in section 300.400(b) subject to limitations on response.
- A party responsible for the release, or any other person, is providing appropriate response, and on-scene monitoring by the government is not required.
- The Removal Site Evaluation is complete.

4. As reflected in Section 3. above, the Removal Site Evaluation was terminated due to its completion and for other reasons. Therefore, the following factors were considered in determining the appropriateness of a Removal Action pursuant to section 300.415(b)(2) of the NCP:

- Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;
- Actual or potential contamination of drinking water supplies or sensitive ecosystems;
- Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or

other bulk storage containers, that may pose a threat of release;

- ( ) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate;
  - ( X ) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;
  - ( X ) Threat of fire or explosion;
  - ( X ) The availability of other appropriate Federal or State response mechanisms to respond to the release; and
  - ( X ) Other situations or factors that may pose threats to public health or welfare or the environment.
5. The Site was referred to the EPA by the Massachusetts Department of Environmental Protection. No state funds are available for addressing hazardous materials at the Site.
  6. EPA OSC Bzenas and support contractors visited the Site on February 13, 2003 with the Merrimac Fire Department. Samples were collected from six plating baths. Analysis was performed by the EPA New England Regional Laboratory. The owner has filed for Chapter 11 bankruptcy.
  7. Preliminary results indicate up to 1% cyanide in plating solutions and pH ranging from extremely acidic (pH 0) to extremely caustic (pH 13). Therefore, a Removal Action under section 300.415 of the NCP is **necessary** at this time.
- cc: Dave McIntyre, Chief, SERS I  
Richard Chalpin, MADEP Northeast Regional Office