

Site: Industri-Plex
Break: 7.22
Other: 15048

DUNDEE PARK PROPERTIES

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July 30, 1985

Mr. Richard T. Leighton
Waste Management Division
EPA
JFK Building - R1907
Government Center
Boston, Mass. 02203

Subject: Stauffer Phase II Report

Dear Rick:

I am the owner of property that abuts the Industri-Plex hazardous waste study area on the north, in Woburn, MA.

After careful review of the Stauffer Phase II document by both myself and my engineering consultants, GZA, Inc., I am submitting the following general and specific comments on the report.

It is noted that only the Feasibility Study (FS) volume of Stauffer's Remedial Investigation/Feasibility Study report was provided for review. GZA requested a copy of the RI report from EPA but did not receive it.

GENERAL COMMENTS

We believe Stauffer's consultants have viewed the problem too strictly. The choices they have suggested and cost estimates prepared, specifically with regard to the cover material of the heavy metals and the hide treatment, do not allow for any compromise solutions. They offer, as solutions to the heavy metal problem, either total cover, total excavation to an off site RCRA facility, or creation of a large RCRA facility on site for all of the material. For the hides, they suggest cover and venting of only the east pile and no treatment of the west, central, or south piles.

I believe EPA should select a solution from a combination of options. There is compromise somewhere that is both environmentally safe, yet cost effective.

Also, we believe there can be reuse to the site. The heavy metals, because of their relative inertness, can be dealt with in a manner that still protects the environment. We would like to discuss that option with the EPA.

SPECIFIC COMMENTS

1. According to the plans presented in Stauffer's FS (Figures D, E, and F) neither hides nor contaminated soils (which could constitute a potential health threat) are present on Dundee Park property. Furthermore, the benzene/toluene groundwater contamination volume is shown to originate at a point well south of the Dundee Park property line. The inference, therefore, is that the Dundee Park parcel is not affected by the contamination observed within the Industri-Plex site.

As data from GZA's previous studies (report dated July 1982) have indicated, plans depicting the extent of contamination presented in Stauffer's FS are inaccurate. In reality, a significant portion of the east hide pile lies on Dundee Park property. In addition, elevated levels of benzene and toluene were found in GZA wells B-1 and B-7A, within the west and east hide piles, respectively, on Dundee Park property. Within the following table, samples from GZA's previous studies which exhibited elevated levels of contamination beyond the areas depicted by Stauffer are summarized.

<u>Sample Number</u>	<u>Depth</u>	<u>Contaminant Levels</u>
TP-4 S-1	1' - 2'	180 mg/kg-Pb
TP-4 S-2	3' - 5'	10,000 mg/kg-Cr
TP-12 S-4	11' - 12'	380 mg/kg-Cr
B-1 S-3	3' - 4'	330 mg/kg-Pb
B-7 S-3	8' - 9.5'	2,300 mg/kg-Cr
B-7 S-4	18' - 19.5'	19,000 mg/kg-Cr
B-1 (OW)	Groundwater	16 mg/l Benzene 16 mg/l Toluene

It is noted that, although concentrations in these samples exceed the 100 ppm criterion which Stauffer used to define contaminated soil areas for Figure E, they lie within the potential exposure threat criteria

(greater than 300 ppm As, 600 ppm Pb, or 1,000 ppm Cr in top 2 feet). However, we anticipate that a number of areas within the west and east hide piles within Dundee Park property may exceed these criteria. The detection of elevated levels of benzene and toluene by GZA within the hide piles has also been largely ignored by Stauffer.

These discrepancies in Stauffer's data presentation and interpretations may have some implications with respect to the affects of remedial action plans on the Dundee Park site. Of primary concern is the question of the precise extent of the east hide pile.

If the Stauffer recommendation to the encroachment of the material onto Dundee Park property is to simply cover and vent the east pile with 30" of material, grade at 3:1 to prevent further anaerobic deterioration and emanation of noxious fumes, and not touch the west pile at all, then we disagree with that recommendation for the following reasons:

- grading of at least 3:1 of the sides of the east pile on the northern edge without disturbance of the pile will mean loss of developable land on Dundee Park property, which means loss of income to a "pile" of material which Dundee Park did not deposit; we protested to the developer when it occurred and we have spent thousands of dollars on engineering and testing to evaluate what affect that material may have on the property!
- the west pile, which we believe also encroaches on the property, is not recommended for cover at all. Is it to remain an ungraded pile of rubble?

We hope we do not suffer loss of income, have title insurance problems, and have to bear some of the costs of the cover and maintenance, when we have done nothing and caused nothing. We are the victim of an abutter's indiscretion and EPA delay. We commend Stauffer for taking responsibility for one of the hide piles - but they should take responsibility for grading all of the piles - not just the east.

As modification to the Stauffer recommendation on the hides and cover of the east pile, we suggest the following:

- if possible, remove the hides that were pushed onto Dundee Park property, on both the east and west piles, and grade back from the property line at 3:1, making sure neither the cover material nor the hides remain on the property. The material removed could be placed on central or south hide piles and covered with 30" of material. If that is not possible because of the release of noxious odors, we want as little loss of property as possible and we will not be responsible for any cost relating to relocation, cover, or annual maintenance.
 - with respect to the area west of the south pond, Stauffer has apparently proposed limited cover operations. This does not include areas on Dundee Park property where elevated levels of contamination are known or anticipated to exist at or near ground surface - e.g.: the deposit of red-stained fill along the west bank of the south pond. We recommend that the entire contaminated soil area along the west side of the pond be treated as a unit and be covered as recommended by Stauffer (30 inches of soil and vegetation).
2. The remaining element of Stauffer's proposed remedial plan, interception and treatment of the benzene/toluene plume, does not appear to have major implications with respect to the Dundee Park site. However, it should be noted that the elevated levels of benzene and toluene observed within the hide piles on the site indicate that these deposits may constitute a potential source of the groundwater contamination. The presence of a possibly continuing source of contamination on Dundee Park property carries potentially significant implications which must be considered.
 3. In the spirit of cooperation with the City of Woburn, Dundee Park had agreed to allow the City to create, on the property, a temporary secure cell to hold heavy metal contaminated trench borrow removed from a City of

Woburn waterline replacement in New Boston Street. The waterline was to extend service in New Boston Street that was essential to development of the property north of the New Boston Street bridge. Dundee Park paid for the engineering cost on behalf of the City. The City received a State grant to extend the waterline..

EPA and DEQE forbade the City from accepting the low bid and entering into the contract to extend the water service until acceptance of the Stauffer recommendations.

Stauffer proposed establishment of a trust account to cover the cost of contaminated soil disposal in the event that breaks in the waterlines or addition of new services make excavation necessary. We recommend that instead of waiting for problems to develop, that the waterlines be replaced now and contaminated soils removed as an integral part of the remedial program for the Industri-Plex site. This would particularly apply to water lines; sewer lines would be less critical. We also recommend that utility lines along the northern portion of Commerce Way and along Atlantic Avenue be investigated in a manner similar to the study of the New Boston Street and Merrimac Street lines (funded by Dundee Park and prepared by GZA).

The evaluation of Stauffer's Feasibility Study can be summarized as follows:

1. Plans delineating areas of contamination are of insufficient accuracy to adequately design remedial measures.
2. The proposed remedial plan for the east hide pile appears to be the most reasonable approach to this area.
3. Planned covering of contaminated soil areas is considered adequate as a conceptual approach to remediation; however, EPA should reevaluate the proposed area to be covered. In particular, the entire west hide pile area should be included in the remedial program.

4. EPA should conduct further study of the benzene and toluene contamination within the east and west hide piles.
5. The issue of utility lines surrounded by contaminated soil should be addressed directly as an integral part of the remedial program rather than simply establishing a contingency plan.

We commend Stauffer for completing the study and taking cleanup responsibility for the hides. We hope the EPA acts expeditiously to make a decision and get on with the cleanup. The innocent property owners and abutters should not be penalized further for the acts of the former and present owners of the site.

Sincerely,



Augustine P. Sheehy

APS/alm

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