EPA REGION I
REMOVAL PRELIMINARY ASSESSMENT

Hilton Chrome, 75 Holly St., Lawrence, MA

Name: Hilton Chrome **Location:** 75 Holly St.
Town: Lawrence **County:** Essex **State:** MA

Site Status: ☐ **NPL** X **NON-NPL** ☐ **RCRA** ☐ **TSCA**
☐ **ACTIVE** ☐ **ABANDONED** ☐ **OTHER**

X **Attached Google Earth Map of Location** X **Site I.D. No.:** 01HW

Latitude: 42.7144N **Longitude:** -071.1749W

Referral

☐ **Citizen** X **City/Town** X **State**
☐ **Preremedial** ☐ **RCRA** ☐ **Other: Remedial**

Name of referring party: Victor Fonkem, MassDEP **Telephone:** 978.694.3395
Address: victor.fonkem@state.ma.us

Contacts Identified

1) Dick Hilton, Hilton Chrome **Telephone:** 978.479.7686 (c), 978.840.1653 (h)
2) Inspector Frank Skusevich, LFD **Telephone:** 978.360.2787 (c), 978.620.3423 (w)
3) Lt. Paul Maccarone, LFD **Telephone:** 978.314.2543 (c), 978.620.3418 (w)
4) Don Naim, OSHA **Telephone:** 978.837.4471 (w)

Source of Information

X Verbal: Verbal report of inspection from MassDEP.
X Report: Analytical data report by EPA START contractor
X Other: Email written summary of MassDEP inspection and interview with the operator of the facility, including photos.
X Other: EPA/START PA/SI inventory of vats/containers and field screening results.

Potential Responsible Parties

Name: Dick Hilton **Telephone:** 978.479.7686 (c), 978.840.1653 (h)
Address: 1175 Elm Street, Leominster, MA 01453

Operator: same as above **Telephone:** same as above
Address: same as above

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Site Access

Authorizing Person: Dick Hilton, owner/operator
Date: 12/18/2011 **Telephone:** 978.479.7686(c), 978.840.1653(h)
Authorizing Person: Jack Bergman, Assistant Chief, Lawrence FD; LFD has secured and is controlling access to the Site.
Date: 12/13/2011 **Telephone:** 978.620.3400

X Obtained	**☐ Not Obtained**
X **Verbal**	**X Written**

Physical Site Characterization

Background Information: The site is a metal finishing/electroplating facility that was operating until November 2011. MassDEP and City of Lawrence officials inspected the site on 12/1/2011 with the owner due to complaints regarding housekeeping. As a result of the inspection the Lawrence building inspector shut down operations at the facility, secured electric and gas service and all plating operations were shut down indefinitely.

Description of Substances Possibly Present, Known or Alleged: Approximately 45 various sized open rectangular-shaped polypropylene plating, rinsing and waste vats and tanks were observed containing hundreds of gallons of plating and rinsing fluids. Also present were several dozen drums with labeled chemicals, wastes and unknown fluids. The facility also has a waste water treatment system in the main building comprised of approximately 10 tanks and vats that were filled with fluids and two containers of labeled solid sludge waste. An inventory of materials included: hydrochloric, nitric and sulfuric acid, 50% sodium hydroxide, acid copper solution, granular copper cyanide and sodium cyanide. There were also a number of empty vats and drums in the facility and on the facility grounds.

The facility condition is degraded; portions of the roof have failed, the foundations of a sulfuric acid vat are compromised and the vats is askew and one vat of acid copper solution had leaked into a contained sump area in poor condition before being pumped to another vat.

Existing Analytical Data

X Real-Time Monitoring Data: Monitoring was conducted on January 25-26 2012**.** The site atmosphere met ambient standards by screening with a MultiRAE Plus fitted with oxygen, lower explosive limit, volatile organic compounds and hydrogen sulfide sensors and radioactive material was not detected. Acidity testing with pH paper indicated several vats or drums with a pH of 0-1 and 13-14. Monitoring with an Ahura FD Ramman Spectrometer on liquids was performed on several samples. The owner/operator of the facility labeled the majority of the full and partially full vats and drums with their contents; he also labeled several drums, vats and/or bags with a hazardous waste label denoting their contents.

X Sampling Data: Eleven liquid samples were taken from drums and vats to confirm their contents as they couldn't be determined from the owner/operators knowledge, container markings or field monitoring methods. As of this date, the analytical results aren't yet available.

REMOVAL PRELIMINARY ASSESSMENT

Potential Threat

Description of potential hazards to the environment and/or population-identify any of the criteria for a Removal Action (from NCP) that may be met by the site under 40 CFR 300.415 [b] [2]:

X Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants.

X Actual or potential contamination of drinking water supplies or sensitive ecosystems.

X 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.

☐ Other situations or factors that may pose threats to public health or welfare or the environment.

Prior Response Activities

X PRP X **STATE** X **FEDERAL** X **OTHER (City)**

Brief Description: The PRP labeled the majority of the containers with their contents and placed hazardous waste labels on known wastes to his best knowledge. He also better secured some materials and conducted a facility walk through. The MassDEP inspected the facility with OSHA and city FD and building inspector officials on 12/1/2011. The building inspector secured access to the site and gas and electric utilities. The city fire department is controlling access to the site.

Priority for Site Investigation

X High ☐ **Medium** ☐ **Low** ☐ **None**

Comments: A site investigation was performed concurrently with the preliminary assessment.

Report Generation

Originator: Michael Barry
Affiliation: US EPA Region 1 OSC
TDD No.: 01-12-01-0001 (for START PA/SI support)
Date: February 2, 2012
Telephone: 617-918-1344
Task No.: (Contract EP-W-05-042)

EPA REGION I
REMOVAL SITE INVESTIGATION

Inspection Information

Site Name: Hilton Chrome **Address:** 75 Holly Street
Town: Lawrence **County:** Essex **State:** MA
Date of Inspection: 1/25-26 2012 **Time of Inspection:** 0700 – 1600 Daily
Weather Conditions: Sunny, 25 – 40 degrees F
Site Status at Time of Inspection: ☐ **ACTIVE** **X INACTIVE**
Comments: Two-day inspection with field monitoring, site inventory and sampling.

Agencies/Personnel Performing Inspection

	Names	Program
X EPA:	Michael Barry	Superfund Removal Program
X EPA Contractor:	Chris Dupree	START III Contract-Weston Solutions
	Eric Ackermann	START III Contract-Weston Solutions
	Bill Mahaney	START III Contract-Weston Solutions
	Colin Cardin	START III Contract-Weston Solutions
	Andrew Danikas	START III Contract-Weston Solutions
X State:	Victor Fonkem	MassDEP Emergency Response Program, Bureau of Waste Site Cleanup
X City:	Frank Skusevich	Inspector, Lawrence Fire Department
	Paul Maccarone	LT, Lawrence Fire Department
X Current Owner	Dick Hilton	Owner/operator

Physical Site Characteristics

See attached Google Earth view and hand-drawn site schematic.

Parameter		Quantities/Extent
X Cylinders:		Approximately 25 old fire extinguishers
X Drums:		24 drums of known & unknown chemicals & 12 drums of hazwaste
		Approximately 25 empty drums
		Approximately four containers of hazardous chemicals
☐ **Lagoons:**		
X Tanks:	**X Above:**	Six full treatment system tanks of 300-1000 gallons each
	☐ **Below:**	
X Vats:		**Approximately** 50 vats & sumps of metal plating & processing fluids, mostly full/partially full
		Nine vats of labeled hazardous waste
		Approximately 20 empty vats

Physical Site Characteristics (Concluded)

☐ **Asbestos:** None observed
☐ **Piles:** None observed
☐ **Stained Soil:** None observed
☐ **Sheens:** None observed
☐ **Stressed Vegetation:** None observed
☐ **Landfill:** None observed
☐ **Other:** Three boxes of photo chemicals in small bottles
A number of chemicals small, lab sized containers
Large amount of non-hazardous debris and trash throughout the facility
☐ **Population in Vicinity:** Per the EPA New England ArcGIS database nighttime populations near the facility are: 0.25 mile-3,666, 0.5 mile-14,311, 1.0 mile-40,530; daytime populations are slightly lower.
☐ **Wells:** ☐ **Drinking:**
☐ **Monitoring:**
☐ **Other:** The facility used a well for processing water only.

Physical Site Observations

Comments: Currently fluids are contained within drums, vats and other containers within the facility building. However, the building is in a dilapidated condition. There are holes in the roof and portions of it are subject to further failure. The brick foundations of the sulfuric acid vat have partially degraded and it is askew. One of the acid copper solution vats leaked into its containment sump area; the remaining contents were pumped to another vat and the sump is contained for now, but is subject to future failure.

A significant amount of process hazardous chemicals and hazardous wastes are stored on site that will degrade over time.

Though the facility was recently operating, it's in an extremely degraded condition; as such the city building inspector and fire department felt compelled to order all operations to cease. The facility is adjacent to the Spicket river and is subject to periodic flooding; evidence of the 2006 flood was apparent in the inspection. The owner/operator stated that he doesn't have the resources to address facility concerns or continue operations.

See site map, diagram and photos.

REMOVAL SITE INVESTIGATION

Field Sampling and Analysis

Matrix/Analytical Parameter	Field Instrumentation O_2	RAD	PID	H2S	H2SO4 Draeger
Background Readings:	20.9%	Bkgnd	0ppm	0 ppm	non-detect
Air:	20.9%	Bkgnd	0ppm	0 ppm	non-detect

Soil: n/a
Surface: n/a
Water: n/a
Tanks: n/a
Drums: pH ranged from 0 – 14, several indicated 0-1 and 13-14; Ahura Ramman Spectrometer experienced issues due to florescence interference.
Vats: pH ranged from 0 – 14, several indicated 0-1 and 13-14; Ahura Ramman Spectrometer experienced issues due to florescence interference.
Lagoons: n/a
Spillage: n/a
Run Off: n/a
Piles: n/a
Sediments: n/a
Groundwater: n/a
Other: none

Field Quality Control Procedures

X SOP Followed ☐ **Deviation From SOP**

Comments: Activities followed the Emergency Planning and Response Branch Generic Quality Assurance Project Plan dated March 22, 2004 and a site specific Sampling and Analysis Plan approved on 1/25/2012 prior to start of sampling activities.

Description of Sampling Conducted

(number of locations, parameters, media)

Liquid samples were taken from six drums and five vats for metals and cyanide analysis by the New England Regional Lab. Samples were taken from containers with both unknown and/or unlabelled contents and several which were labeled to confirm and/or back up field pH screening.

Analyses

Analytical Parameter	Media	Laboratory
☐ **VOC**	☐ **AIR**	**X NERL**
☐ **PCB**	☐ **WATER**	☐ **CLP**
☐ **PESTICIDE**	☐ **SOIL**	☐ **PRIVATE**
X METALS	☐ **SOURCE**	☐ **SAS**
X CYANIDE	☐ **SEDIMENT**	☐ **SOW**

REMOVAL SITE INVESTIGATION

Analyses (Concluded)

Analytical Parameter	Media	Laboratory
☐ SVOC	X DRUMS	X FIELD
☐ TOXICITY	X VATS	
☐ DIOXIN		
☐ ASBESTOS		
☐ OTHER		

Analytical results: Will be provided at a later date with the detailed PA/SI report.

Receptors

Comments

☐ **Drinking Water** ☐ **Private:**
☐ **Municipal:**

☐ **Groundwater:**

X Unrestricted Access: Access currently restricted, however local indigents may gain access and their health will be impacted if the site is not addressed.

X Population in Proximity: The site is in a dense, mixed residential and light industrial area.

X Sensitive Ecosystem: The Spicket river abuts the site and it flows into the Merrimack river approximately 2 miles downstream of the site. The site is subject to periodic spring-time flooding.

X Other: Air impacts to the public in event of building fire

Additional Procedures for Site Determination

☐ **Biological Evaluation** ☐ **ATSDR**

Biological or ATSDR health Consult not required for this site.

Site Determination

Depending on further information, criteria that may be met by the site include 40 CFR 300.415 [b] [2], parts:

X Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants.

X Actual or potential contamination of drinking water supplies or sensitive ecosystems.

X 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.

Site Determination (Concluded)

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.

☐ Other situations or factors that may pose threats to public health or welfare or the environment.

Report Generation

Originator: Michael Barry	**Date:** February 6, 2012
Affiliation: US EPA Region 1 OSC	**Telephone:** 617-918-1344
TDD No.: 01-12-01-0001 (for START PA/SI support)	**Task No.:** (Contract ER-W-05-042)