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Relocation letter

May 18, 1983

Mr. and Mrs. Allan Danley
3 Cottage Place
Lowell, MA 01852

Dear Mr. and Mrs. Danley;

At the Task Force meeting on May 11, 1983, I was asked to respond to five requests outlined in a May 11, 1983 Lowell Fair Share press release. Since that meeting I have researched several possible answers which I will describe to you with the understanding that you will discuss these options at a May 23rd neighborhood meeting.

Short term relocation can be approached in several ways. It is primarily EPA's responsibility to activate the Federal Emergency Management Agency (FEMA) through site specific work assignments. It is EPA's practice to request advice from the Center for Disease Control (CDC) as to whether or not the contaminant levels, potential population exposure, and on-site activities warrant specific action such as short term relocation. If CDC advises it, then EPA would design a specific request and issue a work assignment to FEMA to implement. This mechanism is not only administratively burdensome but financially costly as well and has been reserved for cases where extensive relocation is necessary.

For less extensive relocation such as for a matter of hours or days, the local Red Cross has been used to help set up temporary shelter. This option would work if residents needed to be removed to a local high school or gymnasium while specific on-site activities occurred.

Finally, the most likely option is to request the contractor responsible for specific subcontracts, such as the demolition contractor and the capping contractor, to develop a safety plan which includes not only on-site worker safety procedures but procedures to inform the neighborhood and local businesses as to when specific on-site activities are scheduled to occur. Using whatever communication channels are agreed upon, the contractor would then announce what actions should be taken for either temporary evacuation or relocation. Such a plan would have to be designed and agreed upon by the neighborhood and the regulatory agencies before the Request For Proposals (RFP's) are issued, since this requirement could increase the cost of the remedial work. The contractor would then be responsible for notifying the neighborhood when appropriate. This last option can be tailored to the specific site situation since we could require night work and other precautionary measures as part of the required safety plan. We would however, need to clearly identify these requirements in the RFP's.

The second request to apply the temporary cap before the children are out of school (June 26, 1983) was discussed at the Task Force meeting. Because of federal procurement procedures it is not possible to have both the demolition work and design and implementation of a temporary cap completed by the end of June. We will however, require the demo-

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lition contractor to perform site preparation work (the filling of certain low areas and the covering of areas where demolition equipment will be used) so as to prevent disturbance of the contaminated soil and to minimize offsite transport of contaminants. In addition, decontamination procedures for equipment vehicles, and salvage will be required. These steps will address one of the concerns raised in relation to neighborhood exposure. Occasional night work may be appropriate to minimize neighborhood exposure.

The third request to consider "cost-effectiveness" after public safety is already a statutory requirement. It is EPA's responsibility to examine the technical adequacy of all proposed remedial solutions to insure that public health and the environment will be protected. "Cost-effective" provisions are then used in consideration of fund balancing concerns such as choosing the least costly of the technically viable options. In other words, the option selected for implementation must be both technically adequate to insure protection of public health and the environment and cost effective to assure that the least expensive appropriate remedy is chosen.

The fourth request that EPA aggressively pursue responsible parties to pay for site cleanup is a legal process which the agency has already initiated. We cannot comment on the cost recovery process beyond saying that it is underway.

The fifth request will be addressed by EPA's contractor, NUS Corporation. The offsite remedial investigation/feasibility study will address ground water contamination, but this work is not part of the initial remedial measures. We will be discussing remedial action at Arrow Trucking with the site owner shortly. The use of the sump pump will be ascertained at that time.

I would be happy to discuss these and any other issues with you in the near future. I can be reached at (617) 223-5709 or please leave a message on the Hotline 453-2817.

Sincerely,

Barbara H. Ikalainen
Site Manager
Site Response Section
Waste Response & Compliance Branch
Waste Management Division

cc: Adam Parker, Fair Share

1WPA:WMD:WRCB:SRS:Ikalainen:bgw:5/18/83

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LOWELL FAIR SHARE
391 Market St., Lowell, MA 01854
454-7659

for immediate release

information: Adam Parker, 454-7659
Norine Danley, 454-7543

May 11, 1983

PRESS RELEASE

**FAIR SHARE: HEALTH AND SAFETY SHOULD COME FIRST IN
SILRESIM RAMP**

Ayers City Fair Share applauds the presentation of a Remedial Action Master Plan (RAMP) for the Silresim hazardous waste dump by the Environmental Protection Agency. However, serious flaws remain in the clean up plan outlined in the RAMP.

First, the plan seems more concerned with cost-effectiveness than with neighborhood health and safety. Second, the plan does not move fast enough, especially concerning the short term temporary remedial action. Specifically:

- ** Fair Share requests short term relocation for families living near the site during subsurface metal detection, removal of buildings and tanks, and construction activity to prepare the temporary cap. The health and safety of residents (and workers on the project) should be the top priority of any clean up work.
- ** Fair Share requests that the temporary cap be applied before summer when our children will be out of school.
- ** Fair Share requests that "cost-effectiveness" be considered only after the safety of residents and clean up workers is considered.
- ** Fair Share requests that responsible parties for the Silresim tragedy pay for the clean up and that the EPA aggressively go after them. These companies include Monsanto, Millipore Corp., Polaroid, and the Union National Bank among many others.
- ** Fair Share requests that underground water flow pushing contaminants off-site, especially toward the River Meadow Brook, be dealt with as part of the immediate remedial action steps. Specifically, the Arrow Trucking sump pump should be shut off. It is currently pulling highly contaminated water off-site.