



## Department of Environmental Protection

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### **Update #3 – MassDEP’s South Framingham Initiative – February 9, 2017**

As you know, MassDEP is conducting an initiative to help improve environmental quality in South Framingham. This is the third update of MassDEP’s efforts. Update #2 was sent on March 31, 2016. At this point, MassDEP’s efforts are focused on ensuring the assessment and cleanup of several large, historic waste sites in South Framingham.

#### **Waste Site Cleanup Program**

The MassDEP Waste Site Cleanup program has focused its efforts for improving environmental quality in South Framingham on three particular sites:

- a. The now-closed General Chemical facility on Leland Street;
- b. The Mary Dennison Park on Beaver Street, which was constructed on a former dump used by the Town of Framingham and Dennison Manufacturing Company; and,
- c. The former Commonwealth Gas manufactured gas plant (MGP) site located at 350 Irving Street.

**Former General Chemical facility, Leland Street** – [Much of this update on the General Chemical site is excerpted from an email sent to the Public Involvement Plan mailing list for the General Chemical site on August 26, 2016.] As mentioned in our last Update, the consultants for General Chemical Corporation submitted their draft cleanup plan for the General Chemical site on Leland Street on February 16, 2016. On April 14, 2016, a public meeting was held at the Wilson School in Framingham to present the draft Remedial Action Plan for the site. The presentation also included proposed changes to the Public Involvement Plan for the site. After the April 14 meeting, a 30-day public comment period commenced. At the request of the Framingham Board of Health, the public comment period was extended 15 days to May 31, 2016.

Written comments on the draft Remedial Action Plan were received from the following:

- Town of Framingham, including the Framingham Town Manager, the Framingham Department of Public Health, the Framingham Conservation Commission, the Framingham Public Schools, and the Framingham Fire Department;
- The Town of Sherborn Board of Selectmen;
- The Town of Natick;
- The Massachusetts Water Resources Authority;
- Alexander Volfson (resident);
- Exelon (abutter)

In addition to the above-listed public comments, MassDEP solicited the comments of the U.S. Environmental Protection Agency, National Risk Management Research Laboratory, Groundwater and Ecosystems Restoration Division, which is located in Ada Oklahoma. Comments were received from U. S. EPA on June 22, 2016 and July 22, 2016.

In accordance with the Administrative Consent Order (ACO) between General Chemical Corporation, Trinity General Corporation, and MassDEP, a summary of all public comments received on the draft Remedial Action Plan, with an explanation of how the comments have been addressed in the final Remedial Action Plan, must be submitted to MassDEP. On August 23, 2016, MassDEP met with representatives of General Chemical Corporation and their environmental consultants, Groundwater and Environmental Services, Inc. (GES) to discuss the response to public comments, and to discuss MassDEP's initial comments on the draft Phase III Remedial Action Plan. Specifically, MassDEP articulated its requirements that cleanup of the site achieve, at a minimum, the following:

- The cleanup must be conducted in a manner that ensures there is no risk to the students and faculty at the adjacent Wilson School or nearby residents;
- The cleanup must achieve the goal of reducing the risk to and protecting the groundwater quality for downgradient private wells;
- The cleanup must not have any long-term negative impacts on water quality, wetlands, or nearby infrastructure;
- Migration of hazardous materials and oil from the General Chemical site into the surface water and into the Sudbury Aqueduct must be eliminated, or if not feasible to eliminate, migration must be controlled or mitigated to the extent feasible;
- Sources of hazardous material and oil contamination, including dense non-aqueous phase liquids, must be eliminated, or if not eliminated, controlled to the extent feasible;
- The mass of contamination must be significantly reduced, and the areal extent of the groundwater plume must be shrunk;

MassDEP's initial comments on the draft Remedial Action Plan also included a discussion of issues raised by the U. S. EPA. In particular, MassDEP cited concerns about the type of chemical oxidant proposed (sodium persulfate), the effectiveness of butane sparging for all of the contaminants of concern, and the need to re-evaluate the application of thermal treatment, especially for contamination at and immediately downgradient of the General Chemical property.

On September 20, 2016, MassDEP met again with General Chemical and GES representatives to continue discussions to develop an acceptable cleanup plan. MassDEP also met with representatives of the MWRA to discuss the comments they submitted on the draft cleanup plan. On December 6, 2016, MassDEP issued to General Chemical a letter establishing January 13, 2017 as a deadline for General Chemical to submit the results of their re-evaluation of thermal treatment at their facility, and any proposed changes to the draft Remedial Action Plan. MassDEP also set January 13, 2017 as the deadline for the completed draft Response to Public Comments which they are required to submit to MassDEP.

On January 13, 2017, MassDEP received the required documents from General Chemical's Licensed Site Professional. [Please note that the "Response to Public Comments" that was submitted on January 13, 2017 was re-submitted on January 25, 2017 due to electronic problems with the document.] In their re-evaluation of the use of thermal treatment at the General Chemical facility, the Licensed Site Professional cited their concern for public safety (mainly at the Woodrow Wilson Elementary School) as the principal reason for keeping the original cleanup plan as their recommended approach for the General Chemical site. MassDEP is currently evaluating this response, as well as previous public input received, in order to make its determination on the proposed cleanup plan.

Two other submittals were recently made by General Chemical and their Licensed Site Professional. On January 30, 2017, MassDEP received the "Semi-Annual Monitoring Report". The report provides the results of the semi-annual monitoring of groundwater, surface water, and the MWRA Aqueduct which General Chemical is required to perform under the terms of the ACO. On January 31, MassDEP received the annual "Remedial Cost Estimate" for the General Chemical site, which is also required by the ACO.

All the submittals from General Chemical can be viewed on MassDEP's on-line file viewer for Release Tracking Number 3-19174. The link for MassDEP's files is [http://public.dep.state.ma.us/wsc\\_viewer/main.aspx](http://public.dep.state.ma.us/wsc_viewer/main.aspx).

**Mary Dennison Park, Beaver Street** – The next milestone in the eventual restoration of Mary Dennison Park is completion of what is called a Comprehensive Site Assessment. While a significant amount of testing has been conducted at the park over the past two years, the Comprehensive Site Assessment will include certain tasks that were not initially conducted, and expand on some of the testing that has been completed already. These tasks include:

- Delineation of the boundaries of past waste disposal;
- Additional soil testing, particularly in areas of the park that have had limited testing, like the embankment to Beaver Dam Brook;
- Surface water and sediment testing in Beaver Dam Brook;
- Additional groundwater testing; and,
- Assessment of the utilities that run beneath the ground surface at the park.

On August 22, 2016, MassDEP received a Comprehensive Site Assessment Scope of Work from the Licensed Site Professional on behalf of Avery Dennison Corporation. MassDEP determined that the Scope of Work was consistent with the discussions and written comments previously provided by MassDEP to Avery Dennison Corporation and the Town of Framingham. As a result of that determination, MassDEP issued an approval letter to Avery Dennison Corporation on September 23, 2016. Based on recent communications with the Licensed Site Professional, it is MassDEP's understanding that the majority of additional testing outlined in the Scope of Work has been completed and that the results are being evaluated to determine if the historic waste materials extend beyond the boundary of the park. If waste materials are determined to extend beyond the park boundaries, additional testing will have to be performed on the properties that abut those particular areas of the park. Nevertheless, MassDEP anticipates that the Comprehensive Site Assessment will be completed by the Spring of 2017, and the development of a comprehensive cleanup plan (called a Remedial Action Plan) will commence soon thereafter.

The reports and letters for this site can be found on MassDEP's on-line file viewer for Release Tracking Number 3-32015.

**Former Commonwealth Gas site, 350 Irving Street** – Since the last Update, the environmental consultants hired by Eversource (the property owner) have continued with additional testing of this site for the purpose of submitting a revised Comprehensive Site Assessment to MassDEP. MassDEP approved the revised Comprehensive Site Assessment Scope of Work on September 23, 2015, which included plans for additional testing of soil, groundwater, surface water and sediments; additional investigations of underground pipes and other infrastructure that had been left after the manufactured gas plant closed; gauging and recovery of separate phase oils; additional testing in the mulch storage yard; a revised risk assessment; additional investigation of a former underground tar holder; and additional investigation around the Sudbury Aqueduct.

On April 11, 2016, the Framingham Board of Health held a public meeting which included a discussion of the work being conducted at this site, and in particular, the incident of March 28, 2016 when a previously-unknown

pressurized gas line was struck and ruptured. Representatives of Eversource and their consultants attended the meeting to answer questions from the Board of Health and the public. They explained that the gas line was unexpectedly encountered during the excavation of tar-contaminated soil and debris from within and adjacent to a former underground tar holding structure. MassDEP representatives were also present to explain its views on the incident and answer questions.

Once the ruptured gas line was capped, excavation of tar-contaminated wastes resumed the following day. During the removal of contaminated soil and debris from the former tar holder, vapor suppression foams were used to limit fugitive emissions from the excavation. Ambient air monitoring and sampling was conducted to ensure that there were no risks to the public during this portion of the cleanup. Eversource and its contractors excavated approximately 1500 tons of contaminated soil and 30 tons of concrete debris from the former tar holder, but were unable to remove all of the waste material due to the depth of the structure and concern for its collapse. As a result, the tar holder was backfilled, and Eversource's Licensed Site Professional addressed further remedial actions at the former tar holder in its site-wide Remedial Action Plan (discussed further below).

In May and June of 2016, Eversource and its contractors completed construction of a load bearing support structure over the Sudbury Aqueduct to accommodate vehicle traffic associated with current commercial operations on the property.

In May of 2016, suspected asbestos-containing material (ACM) was found in the soil berm that encircles the northern and eastern uplands of the 350 Irving Street property. Due to the presence of the suspected ACM, Eversource was required to submit a work plan to MassDEP's Asbestos program to ensure that the suspect material was properly sampled and managed if the presence of asbestos was confirmed. Eversource's plan was reviewed and approved by MassDEP's Asbestos program on May 24, 2016. Results of the sampling conducted by Eversource's contractors under the approved work plan did not indicate the presence of asbestos in the suspect material.

On June 9, 2016, MassDEP held a meeting with Eversource and its environmental consulting team to discuss the status of the various activities required in our 2015 Audit of the 350 Irving Street site. Based on the discussions during that meeting, it became clear that the revised Comprehensive Site Assessment report would not contain all of the test results by the September 1, 2016 deadline that had been established in MassDEP's Audit letter. In order to ensure as much supporting data as possible was presented in the report, MassDEP revised the deadline for submittal of the report to October 6, 2016. Other deadlines were also adjusted to allow for MassDEP review and approval of the Remedial Action Plan that was submitted on December 1, 2016.

Further testing of Beaver Dam Brook was one of the requirements of MassDEP's 2015 Audit. The additional sediment testing of Beaver Dam Brook was conducted in the Summer of 2016. The results of that testing are in the revised Comprehensive Site Assessment report submitted by Eversource on October 6, 2016.

On September 1, 2016, MassDEP issued a letter to Eversource to clarify a number of technical issues and articulate MassDEP's expectations for the Comprehensive Site Assessment report, including:

- The value of multilingual signs to warn the public of hazardous conditions at the site;
- The need to fully document the efforts made to identify buried structures at the site which may contain hazardous waste materials or be a conduit for the migration of waste materials;
- The need for characterization of the vertical extent of contamination, such as in the sediments of Beaver Dam Brook, for use in evaluating cleanup options;
- The need for sampling suspected asbestos-containing materials in the northern undeveloped portion of the 350 Irving Street property;
- Other technical clarifications for incorporation into the revised Comprehensive Site Assessment report.

Eversource submitted their revised Comprehensive Site Assessment report for the 350 Irving Street site on October 6, 2016. The revised Comprehensive Site Assessment documented all of the various testing and investigative actions conducted since MassDEP's 2015 Audit and a revised characterization of risk of harm to public health and the environment. The report includes the findings of Eversource's environmental consultants that certain portions of the site need to be cleaned up to meet the requirements of MassDEP's Waste Site Cleanup program.

On December 1, 2016, Eversource submitted their revised Remedial Action Plan for the 350 Irving Street site. The revised cleanup plan includes their justification for remedial actions at certain parts of the 350 Irving Street site, including:

- Excavation of contaminated sediments from the wetland area in the southern portion of the property, excavation of contaminated sediments from portions of the unnamed stream and Beaver Dam Brook, excavation of a PCB "hot spot" in the southeastern portion of the property, removal of the contents of a former "tar separator", and re-location of the active gas line located on the southern portion of the property;
- Construction of a groundwater barrier to prevent groundwater contamination from affecting the water quality in the stream on the eastern side of the property;
- Immobilization of the residual tar waste in the former tar well;
- Recovery of immiscible oils in the subsurface;
- Placement of a restriction of certain uses on a portion of the property.

The most recent submittal made by Eversource is a January 31, 2017 plan to remove the PCB-contaminated soils from a discrete location on the southeastern portion of the property. This plan and the other submittals referenced above for the Irving Street site can be found on MassDEP's on-line file viewer for Release Tracking Number 3-0589.

MassDEP is in the process of concluding its review of the Comprehensive Site Assessment report, and will be issuing a letter to Eversource with our comments. In addition, MassDEP is reviewing the Remedial Action Plan, and will be issuing an approval letter (or partial approval letter) in the near future.

### **MassDEP Web Page for South Framingham**

MassDEP has created a web page specific to our activities in South Framingham, where information and photos about our activities in South Framingham can be found in one place. The web page can be accessed at:

<http://www.mass.gov/eea/agencies/massdep/service/justice/south-framingham/>