

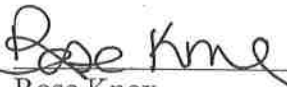
FINAL

ON-SCENE COORDINATOR REPORT  
BROWNFIELDS CLEANUP REVOLVING LOAN FUND

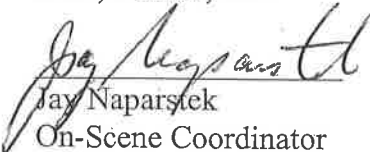
March 18, 2004

Former First National Bank Site  
9 Bank Row  
Greenfield, MA 01301

Removal Action Dates  
October 24, 2003 to December 29, 2003



Rose Knox  
On-Scene Coordinator  
DEP, Boston, MA



Jay Naparszek  
On-Scene Coordinator  
DEP, Boston, MA



Peggy Sloan, Planning Director  
Franklin Regional Council of Governments  
Greenfield, MA

## Executive Summary

SITE: Former First National Bank Site

LOCATION: 9 Bank Row  
Greenfield, MA 01301

PROJECT DATES: October 24, 2003 – December 29, 2003

DESCRIPTION: The site is located at 9 Bank Row in Greenfield, Massachusetts. The property contains a single-story building with a basement and mezzanine and an alley south of the structure. The site was owned and operated by First National as a bank building from the time of construction in 1928 until 1972 at which time the bank was closed and the property was sold to a private owner. The property was sold for \$1 to the current owner, Franklin County Community Development Corporation (CDC), in 2002. The building on the site has remained unoccupied since the mid 1970's, and prior to the removal action, was in a state of disrepair.

The CERCLA hazardous substances on the site as part of this removal action included, but are not limited to:

- Asbestos Containing Materials (ACM)
- Lead-Containing Paint Chips
- Pigeon Guano
- Suspected PCB-Containing Light Ballasts
- Suspected Mercury-Containing Switches
- Suspected Mercury-Containing Fluorescent Lamps
- Boiler Ash

ACTIONS: Under the Brownfields Cleanup Revolving Loan Fund Program, the Franklin Regional Council of Governments (FRCOG) has approved a loan of up to \$150,000 to the Franklin County CDC to conduct a CERCLA non-time critical removal action at the Site. This non-time critical removal action was limited to an above-ground cleanup, consisting of asbestos abatement and the removal of hazardous substances contained within the building. The removal action was conducted by Thayer Street Associates, Inc., the general contractor for the Franklin County CDC for the building stabilization and hazardous materials abatement, and their subcontractor, Abide, Inc.

Approximately 810 cubic yards of ACM were removed and disposed at the Waste Management of New Hampshire Landfill in Rochester, New York. Other waste materials removed and disposed of were lead-containing paint chips, boiler ash, pigeon guano, non PCB-containing light ballasts, suspected mercury-containing fluorescent lamps, and oil.

The removal action objectives for the above-ground contaminants were met as confirmed by post-cleanup inspection and sampling.

## I. Summary of Events

### A. Site Conditions and Background

The Site was owned and operated by First National as a bank building from the time of construction in 1928 until 1972 at which time the bank was closed and the property was sold for to a private owner. The building on the Site has a footprint of 6,342 square feet and the adjacent alley has an area of 628 square feet and is paved. The site has been unoccupied since the mid 1970's and the building was in a state of disrepair. The roof above the first floor and mezzanine ceiling was leaking in several locations and several of the large windows in this room were broken and there was evidence that trespassers had entered the building, possibly through these windows.

The site is located on Bank Row in Greenfield, MA as shown on Figure 1. The site occupies 0.16 acres and is bounded to the North by Main Street and an office building (at 3 Bank Row), to the South by an office building (15 Bank Row), to the East by Western Massachusetts Theater (361 Main Street), and to the West by Bank Row and Court Square, and a common area.

This Site was assessed by Environmental Compliance Services, Inc. (ECS) of Agawam, MA, and by Tighe and Bond of Westfield, MA, in preparation for remediation activities. ECS prepared an *Asbestos Inspection Report* dated December 2002. Tighe and Bond prepared a *Phase I Environmental Site Assessment* described in the report dated April 2003. Tighe and Bond also completed an *Environmental Remediation Plan* dated April 18, 2003.

Using the results of the site assessment, Tighe and Bond prepared for the Franklin County CDC a draft Engineering Evaluation/Cost Analysis (EE/CA) dated May 12, 2003. There was a 30-calender day public comment period on the Draft EE/CA from May 23, 2003 to June 23, 2003, and a public hearing was held on May 27, 2003. No oral or written comments were received relative to the EE/CA. The EE/CA was approved by the FRCOG on August 21, 2003. The selected remedial alternative included asbestos abatement and hazardous substances removal for the entire building. This alternative includes abatement and removal of the plaster walls as asbestos containing building materials. This alternative is based on consideration of worker safety, technical feasibility, long-term and permanent containment of the risk, and cost. On November 3, 2003, the FRCOG signed the Action Memorandum prepared by DEP acting as the On-scene Coordinator.

On September 25, 2003, the DEP (Western Regional Office) issued an approval for a Revised Work Plan for asbestos handling at the Site.

## B. Basis for Removal Response Action

ACM were identified throughout the Site. ECS conducted sampling for ACM in December of 2002. Testing results indicated the presence of ACM in boiler insulation, pipe insulation, floor tile, mastic, window caulking, roof shingles, and paper at the levels ranging from 1% to 23 % Chrysotile asbestos. Because the roof was in a state of disrepair and was leaking, there was a potential for migration of ACM through air and runoff. There was also the potential for trespassers to be exposed to the Site contaminants by inhalation or/and direct contact.

The presence of lead, asbestos, suspected PCB-containing light ballasts, suspected mercury-containing switches, suspected mercury-containing fluorescent lamps, and other contaminants in an unsecured building posed an unacceptable health risk to workers, trespassers, community members who frequent the area, and the environment. Flaking paint chips were observed throughout the first floor and mezzanine areas. The presence of lead paint was confirmed in samples collected from painted surfaces. The lead paint and ACM remediation occurred simultaneously.

Pigeon guano was observed in the site building and the removal of the guano was completed concurrent with the asbestos abatement. The non-PCB containing light ballasts and suspected mercury-containing fluorescent lamps also were removed during asbestos abatement activities.

An above-ground storage tank (AST) was located in a portion of the basement with a concrete floor. The AST appears to have a 500-gallon capacity and was used for heating oil storage. Remediation of petroleum contamination is not eligible for funding under EPA's Superfund and Brownfields Revolving Loan Fund programs due to the petroleum exemption under the Superfund law, unless it is comingled with non-petroleum hazardous substances. As a result, the cost of the remediation of the 500-gallon fuel oil above ground storage tank located in the basement of the Former First National Bank was not covered under the Brownfields Revolving Loan Fund Cooperative Agreement for this project.

## C. Summary of Removal Response

On October 24, 2003, Thayer Street Associates, Inc. began site preparation. Hazardous and non-hazardous materials/wastes were removed between October 27, 2003 and December 29, 2003. Thayer Street Associates, Inc. and its subcontractor, Abide Inc. (East Longmeadow, MA) performed the asbestos abatement. ECS Marin (formerly ECS), located in Agawam, MA, a subcontractor to Alderman and MacNeish, performed monitoring during abatement activities.

Two methods of asbestos removal were utilized during the project. The "full containment" method consists of a sealed work area utilizing HEPA filtered air cleaning devices to create a negative pressure enclosure. These enclosures also have contiguous decontamination units.

An asbestos removal procedure referred to as the "glove bag" method was also used. This method is generally restricted to the removal of asbestos thermal insulation from steam pipes and hot air ducts of small diameter, usually less than 8". Glove bag removal requires a

designated work area, which is restricted to properly trained and protected asbestos workers. The workers utilize a remote chamber for worker and equipment decontamination. The pigeon guano, lead paint, and boiler ash were also removed as part of the asbestos abatement. The non PCB-containing light ballasts and suspected mercury-containing fluorescent lamps were removed and drummed while the containment was in place and the fuel AST was removed from the building upon completion of the asbestos abatement.

Approximately 810 cubic yards of ACM were generated and transported for disposal at the Waste Management of New Hampshire in Rochester, New Hampshire. Other waste removed and disposed of included suspected mercury-containing fluorescent lamps (90), non PCB-containing light ballasts (437) and oil (987 gallons). No suspected mercury-containing switches were found at the site. Post remediation inspection, sampling and analysis confirmed that all removal action objectives were achieved. This removal action was completed on December 29, 2003.

No natural resources were impacted by this removal action.

Information on the organizations and individuals that participated in this removal action and their roles and responsibilities are presented in Appendix A. A detailed chronology of the events that took place during the removal action is presented in Appendix B.

#### D. Site Manager Oversight

The On-scene Coordinators, Rose Knox and Jay Naparstek, performed field oversight of this removal action on October 28; November 4, 11, 18 and 25; and December 9 and 16, 2003.

#### E. Resources Committed

Through its Brownfields Cleanup Revolving Loan Fund Program, the Franklin Regional Council of Government has approved a loan of up to \$150,000 to the Franklin County CDC for the non-time critical removal action (above-ground cleanup) of the Greenfield Site. The total removal action costs were \$211,502. The Town of Greenfield also provided up to \$551,000 through a Community Development Block Grant for removal action activities and building stabilization.

## II. Conclusion

This non-time critical removal action was completed on December 29, 2003. The work at the Site was limited to an above-ground cleanup, consisting of asbestos abatement and the removal of hazardous substances contained within the buildings.

Post-cleanup testing confirmed that all removal action objectives were met. The removal action was performed in accordance with the revised Asbestos Abatement Work Plan and Health and Safety Plan finalized by Abide Inc. in November 2003.

### III. References

*Asbestos Inspection Report*, ECS, December 2002.

*Phase I Environmental Site Assessment*, Tighe and Bond, April 2003.

*Environmental Remediation Plan*, Tighe and Bond, April 18, 2003.

*EE/CA*, Tighe and Bond, May 12, 2003

*EE/CA Approval Memo*, MA DEP, August 21, 2003.

*Comprehensive Quality Assurance Project Plan – Asbestos and Hazardous Materials Abatement Air Monitoring*, ECS Marin, November, 2003.

## Appendix A. Organization of the Response

Agencies or Parties Involved	Contact	Description of Participation
Franklin County CDC (Borrower/Recipient)	John Waite	Director Hired Project Manager for the cleanup. Coordinated with the Town of Greenfield and BCRLF Site Managers throughout the process.
Franklin Regional Council of Government (FRCOG) – (Lead Agency and Lender)	Peggy Sloan	Lead Agency Brownfields Coordinator. Coordinated with Town and Site Managers. Reviewed and signed all formal documents.
Town of Greenfield, Department of Planning and Development	Nancy Goff Bill Gran	Assist the Borrower with the cleanup and the future redevelopment of the property.
MA Department of Environmental Protection, Bureau of Waste Site Cleanup, Boston, MA	Jay Naparstek  Rose Knox and Jay Naparstek	DEP BCRLF contact. Coordinated site activities through DEP. Provided guidance on State and CERCLA regulations.  On-scene Coordinators. Assisted the Recipient to ensure the work was done consistent with the requirements of the NCP. Reviewed the draft EE/CA; and prepared EE/CA Approval Memo, Action Memo, and On-scene Coordinator Report.
MA Department of Environmental Protection, Western Regional Office, Bureau of Waste Prevention, Compliance & Enforcement, Springfield, MA	Robert Shultz	Massachusetts Licensed Project Monitor Inspector, Management Planner and Project Designer. Assisted the Recipient to ensure compliance with the asbestos regulations, including any permit and reporting requirements.
US Environmental Protection Agency, Region 1, Boston, MA	Jim Byrne	BCRLF manager. Coordinate with FRCOG Brownfields Coordinator and provided guidance on NCP requirements.
Alderman and MacNeish	Mark Sirulnik, John Strandberg, Tim Nicholson	Architect of Record. Conducted structural engineering study, prepared bid specifications and provided engineering oversight for the project, provided construction oversight service, managed technical aspects of the project for the borrower.

**Appendix A. Organization of the Response (cont.)**

<b>Agencies or Parties Involved</b>	<b>Contact</b>	<b>Description of Participation</b>
Thayer Street Associates, Inc. (TSA) - Contractor	Joe Zurylo	Project Superintendent. Managed cleanup activities.
Abide, Inc., Ludlow, MA - Subcontractor to TSA	Fred LaFortune Chris Coopee	Project Manager/Site Safety Officer. Performed asbestos and hazardous materials abatement and day-to-day implementation, oversight and enforcement of the HASP.
ECS Marin – Asbestos Consultant -Subcontractor to Alderman and MacNeish	Mark Haynes and Ulrich Franz	Special Project Managers, Project Monitors. Assisted the borrower to ensure compliance with the asbestos regulations including any permit and reporting requirements. Conducted all air monitoring for the project.



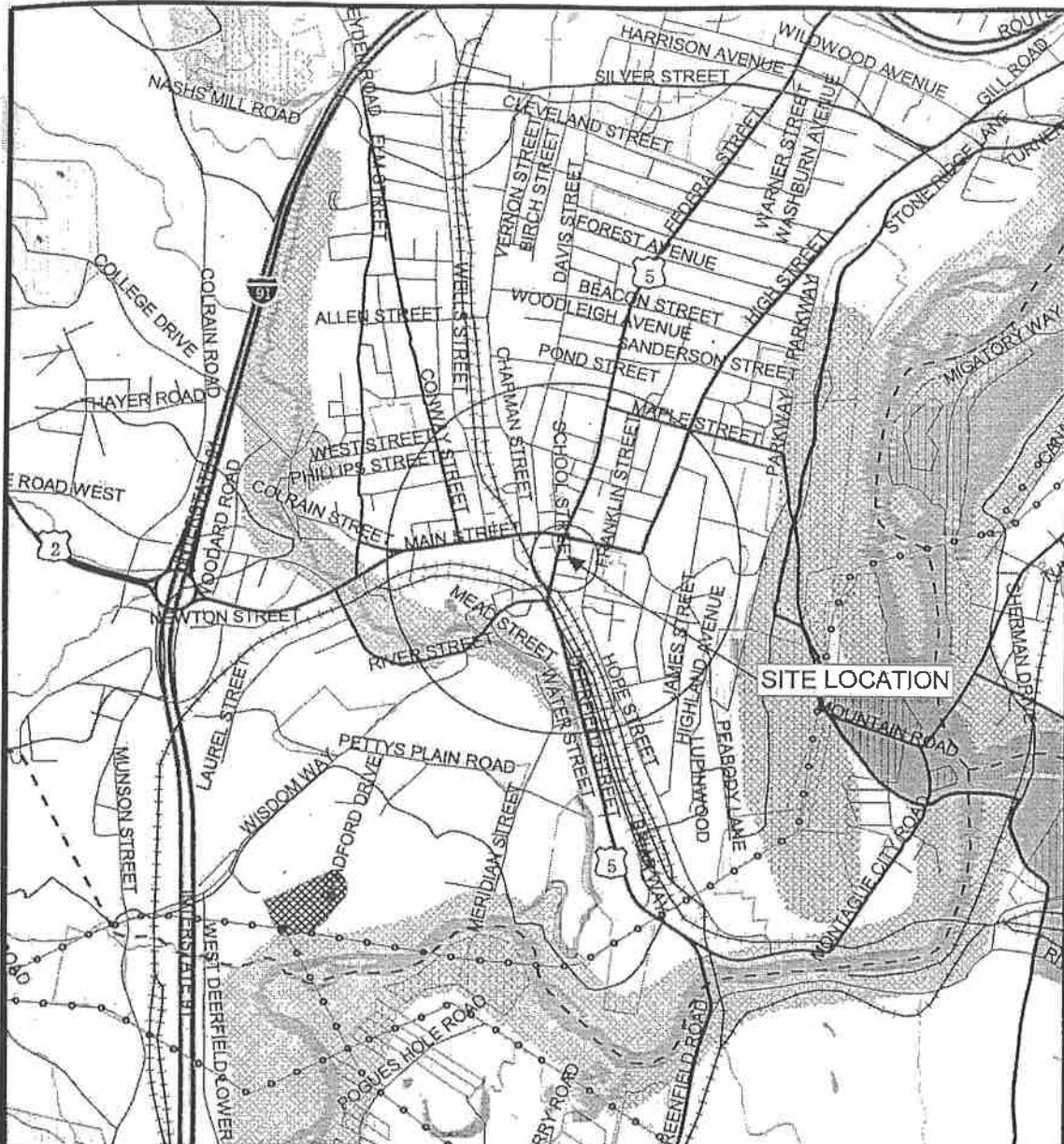
## Appendix B. Chronological Narrative of Response Actions

- ECS prepared a letter report on the results of asbestos sampling in December 2002.
- Tighe and Bond completed a Phase I Environmental Site Assessment in April 2003.
- On May 12, 2003, the draft EE/CA was submitted to DEP, EPA, and the FRCOG.
- On May 23, 2003, the public comment period for the draft EE/CA began with the public notice in the *Recorder* and extended for thirty-calendar days until June 23, 2003. Two notices were placed in the *Recorder*, a daily newspaper published in Greenfield, MA of general circulation in Franklin County and Greenfield.
- On May 27, 2003, a public hearing was held at the Greenfield Town Hall. Copies of the draft EC/CA were available for public inspection at: 1) Greenfield Town Hall, Board of Selectmen's office; 2) Franklin County Community Development Corporation; 3) Greenfield Public Library; 4) the Planning Office at Franklin Regional Council of Governments in Greenfield, MA. No oral or written comments pertaining to the draft EE/CA were received.
- The EE/CA was reviewed by EPA and DEP and approved by FRCOG on August 21, 2003. The alternatives that were evaluated included the removal of asbestos containing materials and hazardous materials with and without the removal of the plaster walls. The preferred alternative was the abatement of the impacted materials with the removal of the plaster walls. This conclusion was based on the consideration of worker safety, technical feasibility, long-term and permanent containment of the risk, and cost.
- On October 9, 2003, the Franklin County CDC submitted the application for \$150,000 of Brownfields Revolving Loan Fund money to perform an above-ground cleanup of the Former First National Bank in Greenfield.
- On October 21 2003, Abide Inc. submitted the Health and Safety Plan and Work Plan for the Site. The DEP provided comments on the Health and Safety Plan to Aldermann and MacNeish on October 30, 2003. On November 6, 2003, the Revised Health and Safety Plan for the Site was submitted and approved.
- On October 24, 2003, Thayer Street Associates, Inc. and Abide Inc. started the cleanup by clearing the Site. ECS Marin performed background air sampling.

## Appendix B. Chronological Narrative of Response Actions (cont.)

- October 27-December 29, 2003: Hazardous and non-hazardous wastes were removed, including a 500 gallon above ground storage tank, and the boiler was cleaned. From November 3, 2003-December 11, 2003, the ACM was shipped to Waste Management Landfill of New Hampshire. The above ground storage tank was emptied of oil and cleaned. Nine hundred and eighty seven (987) gallons of mixed oil and water were removed.
- On November 3, 2003, the FRCOG signed the DEP prepared Action Memorandum.
- On December 12, 2003, hazardous waste removal on the first floor was completed. On December 15, 2003, Abide, Inc. started the asbestos removal in the basement floor of the building. ECS Marin collected area air samples for asbestos during asbestos removal.
- The Removal Action was completed on December 29, 2003.

## FIGURES



BASED ON MassGIS MAP - FEBRUARY 2002. CIRCLES INDICATE 500-FOOT AND 1/2-MILE RADII.

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li> Non-Potential Drinking Water Source Area: Medium Yield</li> <li> Non-Potential Drinking Water Source Area: High Yield</li> <li> Potentially Productive Medium-Yield Aquifer</li> <li> Potentially Productive High-Yield Aquifer</li> <li> EPA Designated Sole Source Aquifer</li> <li> DEP Approved Wetland Protection Area (Zone2)</li> <li> DEP Interim Wetland Protection Area (WIPA)</li> <li> Public Surface Water Supply Protection Area (Zone A)</li> <li> Lakes, Ponds, Streams or other Fresh Water Features</li> <li> Bay Estuary or other Salt Water Features</li> <li> Fresh Water Non-Forested Wetland</li> <li> Salt Water Wetland</li> <li> NHESP 1996-2001 Priority Habitats for State-Protected Rare Species and Endemic Habitats for Rare Vertebrates</li> <li> Protected and Historical Open Space</li> <li> Areas of Critical Environmental Concern (ACEC)</li> <li> Solid Waste Landfill</li> </ul> | <ul style="list-style-type: none"> <li> Public Surface Water Supply (PSWS)</li> <li> Community Public Water Supply - Surface Water</li> <li> Community Public Water Supply - Groundwater</li> <li> Non-Community Non-Transient Public Water Supply</li> <li> Non-Community Transient Public Water Supply</li> <li> NHESP 1999-2001 Massachusetts Certified Vernal Pools</li> <li> Multi-Lane Highway/ADOT Limited Access</li> <li> Other Numbered Highway</li> <li> Major Road - Connector</li> <li> Minor Street or Road</li> <li> Track or Trail</li> <li> Town Boundary</li> <li> County Boundary</li> <li> Trails</li> <li> Possing</li> <li> Pipeline</li> <li> River/Land Stream</li> <li> Aqueduct</li> <li> Major Drainage Basin</li> <li> Sub-Drainage Basin</li> <li> USGS Quadrangle Boundary</li> </ul> |
|--|---|

**FIGURE 1**  
**MassGIS MAPPING**

FORMER FIRST NATIONAL BANK  
9 BANK ROW  
GREENFIELD, MASSACHUSETTS

**Tighe & Bond**

SCALE: 1:25000      MARCH 2003

\* NHESP 1996-2001 Priority Habitats for State-Protected Rare Species (MS) equivalent to "Significant Habitat" as determined under Massachusetts Endangered Species Act.  
 \* NHESP 1996-2001 Endemic Habitats for Rare Vertebrates: For Use with the MA Wetlands Protection Act Regulations (19A CMR 10.00)

# PICTURES



Photograph 1-Front of building



Photograph 2- Former bank area



Photograph 3-Former bank area



Photograph 4-Former bank area



Figure 5-Former bank area during remediation



Figure 6-Former bank area during remediation





Photograph 7-Basement post remediation



Photograph 8-Basement post remediation



Photograph 9-Basement post remediation