

File



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Central Regional Office, 627 Main Street, Worcester, MA 01608

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Commissioner

JUN 17 2009

WRT Management
1 Main Street
Whitinsville, MA 01588
Attention: Len Jolles, Property Manager

RE: **NOTICE OF AUDIT FINDINGS**
Northbridge
355 Main Street
RTN: 2-0011846

Dear Mr. Jolles:

On May 29, 2009, the Massachusetts Department of Environmental Protection (MassDEP, the Department) conducted an audit inspection at the location identified above. This notice informs you of the results of MassDEP's audit.

The audit site inspection was conducted by Paul Vigeant and Stephanie Kelley of the MassDEP's Central Regional Office with you and Neal Drawas, LSP in attendance. In particular the audit focused primarily on the post-RAO Release Abatement Measure (RAM) for the site. The RAM currently includes soil excavation and dewatering with treatment and discharge under a NPDES permit. This work is being done to facilitate the construction of additional loading docks within an area having a recorded Activity and Use Limitation.

NO VIOLATIONS IDENTIFIED

MassDEP did not identify any violations of the requirements applicable to the RAM at the site. A copy of the applicable Audit Inspection Checklist is attached.

LICENSED SITE PROFESSIONAL (LSP)

A copy of this notice has been sent to Neal Drawas, the current LSP-of-Record for the disposal site.

LIMITATIONS

The audit inspection did not include a compliance review of all the response actions taken to date at this site. The audit was focused primarily on compliance with obligation and maintenance conditions as detailed in reports and observed on May 29, 2009.

MassDEP's findings were based on the certainty of the information reviewed during the audit. These findings do not: (1) apply to actions or other aspects of the site that were not reviewed in the audit, (2) preclude future audits of past, current, or future actions at the site, (3) in any way constitute a release from any liability, obligation, action or penalty under M.G.L. c. 21E, 310 CMR 40.0000, or any other law, regulation, or requirement, or (4) limit MassDEP's authority to take or arrange, or to require any Responsible Party or Potentially Responsible Party to perform, any response action authorized by M.G.L. c. 21E which MassDEP deems necessary to protect health, safety, public welfare, or the environment.

If you have any questions regarding this Notice, please contact Paul Vigeant at (508) 767-2810. Please reference the Release Tracking Number, RTN 2-0011846, in any future correspondence to MassDEP regarding the site.

Sincerely,



Diane T. Belliveau, P.E.
Section Chief
Compliance and Risk Reduction
Bureau of Waste Site Cleanup

JUN 17 2009

Date: _____

DTB/PAS/pv

Enc. Audit Inspection Screening Checklist

cc: Northbridge Board of Health
Neal Drawas, LSP, Marsh Risk Consulting, 15 Colonial Road, Sudbury, MA 01776
File
Database [RR/SNAUDI AUDCOM/NAFNVD]

cc: Lisa Alexander, Audit Coordinator, MassDEP-Boston
Mark Baldi, BWSC CERO Audit Section Chief

AUDIT INSPECTION SCREENING CHECKLIST

LEAD RTN: 2 - 11846	Date Inspected <u>May 29, 2009</u>	Action Inspected: <u>RAM</u>
TOWN: NORTHBRIDGE	Site Name WAREHOUSE	
ADDRESS: 355 MAIN STREET		
PRP/OP: ARCADE RT	LSP/Consultant NEAL DRAWAS	

Condition	Yes/No	Comments
Public Health		
>NAPL w/in 15 feet of ground surface	N	
>5 mg/l total VOCs <15' & within 30 feet school/residence	N	
OHM in surficial soil in S-1 area (school/residence/park)	N	
Potential for impacts to nearby receptors	N	
Private wells <500 feet, Zone II, or IWPA	N	
Public Safety		
Accessible pits/lagoons/ debris related to clean-up	N	
Possible fire/explosion hazard	N	
Remedial system not secured	N	
Public Welfare		
Odors/dust/debris/appearance problem	N	
Environment		
Within 500 feet of surface water, ACEC and/or wetlands	Y	
Confirmed contamination of surface water and/or wetlands	N	
Multiple sources of OHM	Y	
Multiple media affected (GW & surface water, soil & air)	Y	
Regulatory Requirements		
Remediation Waste Issues [310 CMR 40.0030]		
Failure to remove remediation waste w/in 120 days	N	
Failure to properly implement BOL process	N	
Preliminary Response Actions		
Immediate Response Actions [310 CMR 40.0411]		
Failure to notify of new release or new condition	N	
Current IRA condition not addressed	N	
Missed deadlines (Forms/Reports)	N	
Failure to comply with IRA Approval/Plan/Conditions	N	
Failure to perform Imminent Hazard Evaluation (40.0426)	N	
Failure to notify of field activities	N	
Assessment & Receptor Issues		
Risk Characterization [310 CMR 40.0900]		
Soil/groundwater category omitted or misidentified	N	
Missed receptors (private wells, wetlands, etc.)	N	
Inadequate soil/groundwater sampling	N	
Extent of contamination not defined	N	
COC/OHM not analyzed for and/or evaluated	N	
Potential migration pathway not evaluated	N	
Potential Source not identified or assessed	N	

Site Summary/Release History/Inspection Highlights/Comments:
 STEPHANIE KELLY AND I CONDUCTED A SHORT NOTICE AUDIT INSPECTION AT THE CORE-MARK WAREHOUSE THIS MORNING IN RESPONSE TO INQUIRIES. THEY ARE CONDUCTING A POST-RAO RAM WITHIN AN AUL AREA TO INSTALL ADDITIONAL LOADING DOCKS TO THE EXISTING WAREHOUSE. THE OWNER SUBMITTED A RAM PLAN IN APRIL THAT PROPOSED THE REMOVAL OF UP TO 500 CY AND OFF SITE DISPOSAL OF DEWATERING IF NEEDED. THE INITIAL PLAN UNDERESTIMATED THE VOLUME OF SOIL TO BE EXCAVATED AND THE VOLUME OF GROUNDWATER TO BE DEWATERED, SO A RAM MODIFICATION WAS SUBMITTED TO INCREASE THE VOLUME OF SOIL TO 1450 CY AND CONDUCT ON SITE TREATMENT AND DISCHARGE OF THE WATER UNDER A NPDES PERMIT.

MassDEP Inspector/Signature: PAUL VIGEANT  Date: MAY 29, 2009