



October 26, 2011

By Regular and Electronic Mail

Mr. Donald McElroy

US Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code OSRR07-4
Boston, MA 02109-3912

By Electronic Mail

Mr. Paul Craffey

MassDEP
Bureau of Waste Site Cleanup
One Winter Street
Boston, Massachusetts 02108

RE: Resources Superfund Site

FILE: 5819/44344 Corres

Dear Mr. McElroy and Mr. Craffey:

In accordance with Section 3.8 of the approved modified Operations and Maintenance Plan (O&M Plan) for the subject site, results of the inspection of the cap and drainage swale and required corrective actions are documented below. Completed inspection checklists, using the form in Appendix 3-1 of the modified O&M Plan, are included as Attachments 1a and 1b.

- A. Cap. O'Brien & Gere inspected the cap on September 23, 2011. The vegetative cover was observed to be in good condition. No areas of sparse vegetation were observed. The cap was mowed and brush along the fence line was trimmed on September 16, 2011. No areas of settlement, erosion, or slope instability were observed. An animal burrow was identified on the cap during the June 2011 inspection. A licensed animal trapper removed one woodchuck and two skunks from the cap and filled in the animal burrow.
- B. Drainage swale. The drainage swale was inspected by O'Brien & Gere on September 23, 2011 and was observed to be in good condition. No areas of failure, erosion, or instability were noted. Vegetation was removed from the drainage swale on September 16, 2011.
- C. Monitoring Wells. Monitoring wells were not required to be inspected at this time according to the O&M Plan. They will be inspected during the next ground water monitoring event scheduled for June 2014.
- D. Rainfall Inspection. Heavy rainfall was reported in the Palmer, Massachusetts area in August 2011. Although the rainfall amount did not qualify as a "significant rainfall event", a site inspection was performed on September 3, 2011. The cap, drainage swale and monitoring wells were inspected and all were found to be in good condition.

In accordance with our letter dated April 20, 2004, the next inspection of the cap and drainage swale is scheduled to be conducted in June 2012. An Operations and Maintenance, Environmental Monitoring Schedule through 2014 is included as Attachment 2.

Please feel free to call me if you have any questions.

Very truly yours,
O'BRIEN & GERE ENGINEERS, INC.

A handwritten signature in black ink, appearing to read 'James R. Heckathorne', with a long horizontal flourish extending to the right.

James R. Heckathorne, P.E.
Project Coordinator

I:\Psc-Resources.5819\44344.Psc-Resources-S\Corres\Inspections\September 2011\Sept 2011 Inspection letter.docx

cc: By Electronic Mail, With Enclosures
M. Connell - Parker-Hannifin
G. L. Gill-Austern, Esq. - Nutter, McClennen & Fish, LLP
B.M. McDonald, Esq. - Nutter, McClennen & Fish, LLP
J.A. Shanahan, P.E. - O'Brien & Gere Engineers, Inc.
J.M. Rank - O'Brien & Gere Engineers, Inc.

Attachment 1a
PSC Resources Superfund Site
Palmer, MA

INSPECTION CHECKLIST

Name: Paul D'Annibale

Date of Inspection: September 23, 2011

Inspection Frequency	Site Feature Evaluated (check all that apply)	Corrective Action	Comments
1) Year 1 - quarterly 2) Year 2 and after - semi-annually 3) Following significant rainfall events	Capped Area <input checked="" type="checkbox"/> vegetation <input checked="" type="checkbox"/> settlement <input checked="" type="checkbox"/> erosion <input checked="" type="checkbox"/> slope instability <input checked="" type="checkbox"/> mowing (semi-annually) <input checked="" type="checkbox"/> other (animal burrows)	An animal trapper removed one woodchuck and two skunks from the cap between August 14 and August 26, 2011. The cap was mowed and brush along the fence line was trimmed on September 16, 2011.	Animal burrows remained filled in as of the date of inspection. All portions of cap appeared to be well vegetated.
1) Year 1 - quarterly 2) Year 2 and after - semi-annually 3) Following significant rainfall events	Drainage Swale <input checked="" type="checkbox"/> blockage <input checked="" type="checkbox"/> failure <input checked="" type="checkbox"/> erosion <input checked="" type="checkbox"/> instability <input type="checkbox"/> recommendation to regrade <input type="checkbox"/> other (explain)	Vegetation was removed from the drainage swale on September 16, 2011.	The drainage swale was observed to be in good condition.
1) Prior to each sampling event	Monitoring Wells <input type="checkbox"/> visual inspection of each well <input type="checkbox"/> maintenance or rehabilitation (explain) <input type="checkbox"/> other (explain)		Monitoring well inspection was not required.
Wetland inspections are no longer required.			

Note: Explain corrective actions in detail.

Attachment 1b
PSC Resources Superfund Site
Palmer, MA

INSPECTION CHECKLIST

Name: Paul D'Annibale

Date of Inspection: September 3, 2011

Inspection Frequency	Site Feature Evaluated (check all that apply)	Corrective Action	Comments
1) Year 1 - quarterly 2) Year 2 and after - semi-annually 3) Following significant rainfall events	Capped Area <input checked="" type="checkbox"/> vegetation <input checked="" type="checkbox"/> settlement <input checked="" type="checkbox"/> erosion <input checked="" type="checkbox"/> slope instability <input type="checkbox"/> mowing (semi-annually) <input type="checkbox"/> other	No corrective action is needed.	The cap was observed to be in good condition.
1) Year 1 - quarterly 2) Year 2 and after - semi-annually 3) Following significant rainfall events	Drainage Swale <input checked="" type="checkbox"/> blockage <input checked="" type="checkbox"/> failure <input checked="" type="checkbox"/> erosion <input checked="" type="checkbox"/> instability <input type="checkbox"/> recommendation to regrade <input type="checkbox"/> other (explain)	No corrective action is needed.	The drainage swale was observed to be in good condition.
1) Prior to each sampling event	Monitoring Wells <input checked="" type="checkbox"/> visual inspection of each well <input type="checkbox"/> maintenance or rehabilitation (explain) <input type="checkbox"/> other (explain)	No corrective action is needed.	The monitoring wells were observed to be in good condition.
Wetland inspections are no longer required.			

Note: Explain corrective actions in detail.

Attachment 2

**PSC Resources Superfund Site
Palmer, Massachusetts
Operation and Maintenance, Environmental Monitoring
Schedule through 2014**

I. Operation and Maintenance

A. Capped Area Inspections

(Quarterly April 1998 - March 1999, semiannually thereafter and after significant rainfall events)

<u>4/24/98</u> April 1998	<u>6/21/06</u> June 2006
<u>8/10/98</u> August 1998	<u>9/29/06</u> September 2006
<u>9/24/98</u> September 1998	<u>6/26/07</u> June 2007
<u>12/15/98</u> December 1998	<u>9/19/07</u> September 2007
<u>3/16/99</u> March 1999	<u>6/25/08</u> June 2008
<u>9/22/99</u> September 1999	<u>9/30/08</u> September 2008
<u>3/12/00</u> March 2000	<u>6/22/09</u> June 2009
<u>8/24/00</u> September 2000	<u>9/30/09</u> September 2009
<u>6/4/01</u> March 2001	<u>6/1/10</u> June 2010
<u>12/14/01</u> December 2001	<u>9/21/10</u> September 2010
<u>6/20/02</u> June 2002	<u>6/30/11</u> June 2011
<u>12/6/02</u> December 2002	<u>9/23/11</u> September 2011
<u>6/18/03</u> June 2003	_____ June 2012
<u>--</u> December 2003	_____ September 2012
<u>6/23/04</u> June 2004	_____ June 2013
<u>9/22/04</u> September 2004	_____ September 2013
<u>6/24/05</u> June 2005	_____ June 2014
<u>9/28/05</u> September 2005	_____ September 2014
	Semi-annually thereafter

B. Cap Mowing
(Twice each year)

<u>7/10/98</u> July 1998	<u>10/4/06</u> September 2006
<u>__ (1) __</u> September 1998	<u>6/22/07</u> June 2007
<u>5/11/99</u> June 1999	<u>9/26/07</u> September 2007
<u>9/23/99</u> September 1999	<u>7/1/08</u> June 2008
<u>6/15/00</u> June 2000	<u>9/24/08</u> September 2008
<u>9/25/00</u> September 2000	<u>6/25/09</u> June 2009
<u>6/12/01</u> June 2001	<u>9/25/09</u> September 2009
<u>9/17/01</u> September 2001	<u>6/22/10</u> June 2010
<u>6/25/02</u> June 2002	<u>9/15/10</u> September 2010
<u>10/1/02</u> October 2002	<u>6/29/11</u> June 2011
<u>6/17/03</u> June 2003	<u>9/16/11</u> September 2011
<u>9/25/03</u> September 2003	<u>_____</u> June 2012
<u>6/28/04</u> June 2004	<u>_____</u> September 2012
<u>10/1/04</u> September 2004	<u>_____</u> June 2013
<u>7/13/05</u> June 2005	<u>_____</u> September 2013
<u>9/26/05</u> September 2005	<u>_____</u> June 2014
<u>6/19/06</u> June 2006	<u>_____</u> September 2014
	Semi-annually thereafter

C. Drainage Swale Inspection

(Quarterly April 1998 - March 1999, semiannual thereafter and after significant rainfall events)

<u>4/24/98</u> April 1998	<u>6/21/06</u> June 2006
<u>8/10/98</u> August 1998	<u>9/29/06</u> September 2006
<u>9/24/98</u> September 1998	<u>6/26/07</u> June 2007
<u>12/15/98</u> December 1998	<u>9/19/07</u> September 2007
<u>3/16/99</u> March 1999	<u>6/25/08</u> June 2008
<u>9/22/99</u> September 1999	<u>9/30/08</u> September 2008
<u>3/12/00</u> March 2000	<u>6/25/09</u> June 2009
<u>8/24/00</u> September 2000	<u>9/30/09</u> September 2009
<u>6/4/01</u> March 2001	<u>6/1/10</u> June 2010
<u>12/14/01</u> December 2001	<u>9/21/10</u> September 2010
<u>6/20/02</u> June 2002	<u>6/30/11</u> June 2011
<u>12/6/02</u> December 2002	<u>9/23/11</u> September 2011
<u>6/18/03</u> June 2003	_____ June 2012
____ December 2003	_____ September 2012
<u>6/23/04</u> June 2004	_____ June 2013
<u>9/22/04</u> September 2004	_____ September 2013
<u>6/24/05</u> June 2005	_____ June 2014
<u>9/28/05</u> September 2005	_____ September 2014
	Semi-annually thereafter

II. Engineered Wetlands Inspection (Superseded)

A. Inspection/Maintenance

4/24/98 April 1998
8/10/98 August 1998
9/24/98 - 10/16/98 September 1998

B. Target Density Inspections

7/21/99-7/22/99 Summer 1999
8/24/00 Summer 2000

III. Wetland Restoration/Site Enhancement Inspection

A. Inspection/Maintenance (2)

9/18/01 September 2001
5/22/02 May 2002
7/25/02 July 2002
9/11/02 September 2002

B. Target Density Inspections

9/18/01 – 9/19/01 Summer 2001
9/11/02 – 9/12/02 Summer 2002
10/1/03 – 10/2/03 Summer 2003
9/22/04 – 9/23/04 Summer 2004
9/28/05 - 9/29/05 Summer 2005
(3) Summer 2006

IV. Environmental Monitoring

A. Ground water elevation data from all wells
(Quarterly September 1998 - June 2000)

<u>9/22/98</u> September 1998	<u>12/12/99</u> December 1999
<u>12/14/98</u> December 1998	<u>3/12/00</u> March 2000
<u>3/16/99</u> March 1999	<u>6/12/00</u> June 2000
<u>6/14/99</u> June 1999	
<u>9/22/99</u> September 1999	

B. Sampling of ground water, wetland surface water/sediment, Quaboag River surface water/sediment
(Quarterly September 1998 - June 2000, semi-annually for next three years, then annually)

<u>9/22/98</u> September 1998	<u>6/4/01</u> June 2001
<u>12/14/98</u> December 1998	<u>12/10/01</u> December 2001
<u>3/16/99</u> March 1999	<u>6/17/02</u> June 2002
<u>6/16/99</u> June 1999	<u>12/3/02</u> December 2002
<u>9/22/99</u> September 1999	<u>6/16/03</u> June 2003
<u>12/12/99</u> December 1999	
<u>3/13/00</u> March 2000	
<u>6/12/00</u> June 2000	
<u>12/19/00</u> December 2000	

C. Based on O'Brien & Gere's December 5, 2003 Technical Memorandum and the June 16, 2004, May 26, 2005, and May 11, 2006 letters to the Agencies regarding detection frequencies of certain constituents in wetland and Quaboag River surface water and sediment, subsequent environmental monitoring will consist of annual sampling of ground water; sampling of wetland sediment for zinc; and sampling of river sediment for lead.

6/21/04 June 2004
6/23/05 June 2005
6/21/06 June 2006

- D. Based on O'Brien & Gere's April 11, 2007 Technical Memorandum and the June 11, 2007 letter to the Agencies regarding an evaluation of lead concentrations in Quaboag River sediment, subsequent environmental monitoring will consist of annual sampling of ground water and sampling of wetland sediment for zinc.

6/26/07 June 2007

- E. Based on O'Brien & Gere's February 20, 2008 Technical Memorandum and the May 27, 2008 letter to the Agencies, as approved by the Agencies on June 18, 2008, wetland sediment sampling has been suspended and ground water sampling will occur in 2009 and every 5 years thereafter, until cleanup levels are achieved for three consecutive years.

6/26/08 June 2008

6/22/09 June 2009

6/1/10 June 2010

_____ June 2014 (4)

NOTES:

1. Cap mowing was not required in September 1998. The second semi-annual mowing was performed in spring 1999, as required, based on growth and weather conditions.
2. Additional maintenance may be performed based on target density inspections.
3. Based on the 2005 inspection, restored wetlands/enhanced areas have met target density criteria. Further target density inspections are not scheduled.
4. The Performance Standards were not met for benzene in one monitoring well (MW-104B) during the 2010 ground water sampling event. These results are documented in the draft Summer 2010 Environmental Monitoring Report. Under the terms of the May 27, 2008 letter to the Agencies, as approved by the agencies on June 18, 2008, ground water monitoring will next occur in June 2014.