



Aberjona Study Coalition, Inc.

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E1
1030
EP

September 10, 2004

Case Control Unit
Surface Transportation Board
1925 K Street NW
Washington, D.C. 20423
Attention: Ms Phillis Johnson-Ball



Re: Environmental Assessment Finance Docket No. 34391
New England Transrail, LLC, d/b/a/ Wilmington and Woburn Terminal Railroad Co. –
Construction, Acquisition, and Operation Exemption – in Wilmington and Woburn, MA

Contamination Knows No Boundary

The Aberjona Study Coalition, Inc. (ASC) is a coalition of six local community groups: Mystic River Watershed Association, Woburn Neighborhood Association, Inc., Concerned Citizens Network, Friends of the Upper Mystic Lake, Medford Boat Club and Woburn Residents Environmental Network.

The Aberjona Study Coalition, Inc. represents over 225,000 residents that border the Aberjona Watershed. We have received a double TAG Grant from the Environmental Protection Agency (see attached) and are working closely with the EPA as well as a Technical Advisor of whom we have hired, Cambridge Environmental, Inc. (see attached).

ASC has grave concern over the operation at the Olin, 51 Eames Street property that is in close proximity to the Aberjona Watershed. Our primary goal is to ensure that the future assessment and remediation of two Woburn Superfund sites, the Industri-Plex and the Woburn G & H Wells are completed by the responsible parties. Will the possibility of New England Transrail, LLC be added to the list of responsible parties?

As reported in the Department of Environmental Protection report dated April 29, 2003 Re: Wilmington Olin Chemical, 51 Eames Street, RTN3-0471 North Pond Area; It was determined that the North Pond may receive groundwater discharge from the direction of the East Ditch and the Olin property. GEI Consultants, Inc. determined that additional investigation is necessary to assess the nature and extent of contamination that may be due to historical release at the Olin property. (See attached)

As also stated in this report: DEP's conditional approval letter is dated February 1, 2002, and in this letter DEP made it clear that the full extent of contamination that may have migrated downstream through the East Ditch and beyond must be delineated. The East Ditch is a narrow and shallow surface water drainage ditch that flows along the east side of the Olin property through a heavily industrialized area. Surface water drainage from the Olin property enters the East Ditch approximately 3/8 mile south of Eames Street. The East Ditch continues to flow to the South and turns into the New Boston Street Drainway, which was addressed as part of cleanup activities for the Industri-Plex Site. The New Boston Street Drainway (Woburn) flows South and discharges into Hall's Brook (Woburn) then into Hall's Brook Holding Area (Woburn), and then eventually into the Aberjona River. (See attached)

The Wells G & H area has been the subject of intense study since the early 1980's. The Aberjona Study Coalition, Inc. working in conjunction with the Environmental Protection Agency is taking steps forward. The great possibility of spillage or leakage by the operation of New England Transrail, LLC will endanger the Aberjona Watershed. Steps will be taken backward by permitting New England Transrail, LLC to operate on the 51 Eames Street site.

As stated to the EPA in the comment report on the Baseline Human Health and Ecological Risk Assessment, Wells G & H Superfund Site, Operable Unit 3, Woburn, MA on behalf of the Aberjona Study Coalition, Inc. by Cambridge Environmental, Inc., John Durant, Tufts University and Bonnie Potocki, Eco-Solutions, Inc. on October 10, 2003 on the following site: <http://www.epa.gov/region01/superfund/sites/industriplex> The Aberjona River watershed has undergone many changes since the time that the 100-year flood plain was delineated. The recent history of flooding along the Aberjona suggests that the flood plain definition is out-of-date, and raises the possibility of contaminant transport to areas beyond the 100-year flood plain during flooding events. EPA has not collected sufficient data to evaluate whether flooding has increased the concentrations of river-related contaminants in upland soils. For example, the backyards of many residences line the western shores of the Upper and Lower Mystic Lakes. Is it possible that flooding has brought contaminants to these areas? If so, what are the concentrations of contaminants in these soils? We note that residential exposure assumptions assume a significantly higher degree of potential exposure than that considered in the Risk Assessment's recreational use scenarios, and hence even a modest increase in contaminant concentrations in soil could reflect potentially significant risks to human health.

Photographs posted by the U.S. Geological survey during the March 2001 flooding event appear at http://ma.water.usgs.gov/floods/flood032001_img.htm These photographs are indicative of recurrent flooding problems that have developed in the Aberjona Watershed that are not adequately characterized by the flood plain delineations. All locations that flood are of potential concern in the Risk Assessment from the standpoint of contaminant transport and deposition.

We believe that such areas might be extensive. Flooding problems have plagued the Aberjona River Watershed in recent years. The Massachusetts Department of Environmental Management (DEM) is presently updating the flood plain delineation (DEM, 2003). More generally, it is conceivable that the river-related contaminants have migrated to residential soils through flooding events. (See attached)

There are already some residential properties that overlap the existing delineation of the 100-year flood plain, which is widely believed to be undersized. Barring permanent land use restrictions, additional residential properties could be constructed closer to the river in the future.

The Environmental Protection Agency (EPA) will be issuing their report this fall on the Aberjona Watershed study from Route 128 North towards the Olin site. And for this reason we ask that all information be assessed by all parties including for public review and comment.

For the health, safety and welfare of these residents whom we represent we urge you not to grant New England Transrail, LLC application permit that will have the potential to cause injury to the Aberjona Watershed as well as its habitants along the river now and in the future.

Sincerely,



Linda A. Raymond, Treasurer
Aberjona Study Coalition, Inc.

Cc:

Senator John Kerry
Senator John Tierney
Senator Edward Kennedy
Senator Edward Markey
Ellen Roy Herzfelder, Secretary EOE
EPA Regional Administrator Robert W. Varney
State Representative Carol Donovan
State Representative James Miceli
State Representative Jay Kaufman
Woburn Mayor John Curran
Woburn Board of Health Director, Jack Fralick
Chairman Woburn City Council
Alderman John Ciriello
Alderman-at-Large Joanna Gonsalves
Chairman Wilmington Town Council



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EPA Awards Grant to Woburn Community Group

Contact: Alice Kaufman, EPA Community Involvement Office, 617-918-1064

For Immediate Release: June 16, 2003; Release # 03-06-12

BOSTON - The U.S. Environmental Protection Agency today announced that it has awarded the Aberjona Study Coalition, Inc. a \$100,000 Technical Assistance Grant (TAG) for the Aberjona River study which is part of both the IndustriPlex and Wells G & H Superfund sites in Woburn, Massachusetts.

When Congress wrote the Superfund law, they wisely included a provision that provides financial resources for citizens to participate in the many decisions affecting their communities," said Robert W. Varney. "I look forward to the opportunity to work with the Aberjona Study Coalition in these final years of cleanup of these two sites."

Related Information:

[IndustriPlex Fact Sheet](#)

[Wells G & H Fact Sheet](#)

[Long-Term Cleanups](#)

"The Aberjona Study Coalition, Inc., is pleased to have been awarded the EPA Technical Assistance Grant," said Linda Raymond, treasurer of the Aberjona River Coalition, Inc. "A technical assistant will assist us in assimilating the technical information so that we can better afford the 225,000 residents who border the Aberjona River Watershed a comprehensive understanding of the present day risks to human health and the environment the Aberjona River poses from the two Woburn superfund sites."

The Aberjona watershed includes the communities of Arlington, Medford, Reading, Stoneham, Wilmington, Winchester, and Woburn. Represented on the Board of Directors of Aberjona River Study Coalition, Inc. are the Woburn Neighborhood Association, Inc., Mystic River Watershed Association, Woburn Residents Environmental Network, Medford Boat Club, Friends of the Upper Mystic Lake, and Concerned Citizens Network.

Recognizing the importance of community involvement and the need for citizens living near Superfund sites to be well informed, Technical Assistance Grants provide funds for qualified citizen's groups to hire independent technical advisors.

The Aberjona Study Coalition, Inc. plans to use a consultant to interpret data and reports on the upcoming remedial investigation, feasibility study, cleanup decisions, and any other reports and documents that are generated about these two sites. The group also plans to keep residents of these communities informed by newsletters, meetings and Internet website of activities, decisions and outcomes at these two sites.

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EPA has recently released a draft baseline human health risk assessment for the Aberjona River study area. The study looks at potential risks to members of the public who come into contact with the sediment, soils, or surface water, or consume fish within the study area.



METADATA

1. TITLE: EPA Awards Grant to Woburn Community Group
2. ABSTRACT: BOSTON - The U.S. Environmental Protection Agency today announced that it has awarded the Aberjona Study Coalition, Inc. a \$100,000 Technical Assistance Grant (TAG) for the Aberjona River study which is part of both the IndustriPlex and Wells G & H Superfund sites in Woburn, Massachusetts.
3. PURPOSE: Public Information
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 - b. Order Process:
 - c. Technical Prerequisites:
 - d. Automated Linkage:
 - e. Downloadable Files:
8. COVERAGE: N/A
9. TIME PERIOD OF COVERAGE: N/A
10. POINT OF CONTACT FOR FURTHER INFORMATION:

Alice Kaufman
Office of Site Remediation & Restoration
EPA New England
1 Congress Street, Suite 1100 (RAA)
Boston, MA 02114-2023
617- 918-1064
11. RESPONSIBLE PARTY:

Alice Kaufman, EPA Press Office, 617-918-1064
Office of Site Remediation & Restoration
12. DATE OF CREATION: 06/16/03
13. AGENCY SUPPLEMENTAL INFORMATION: N/A
14. EXPIRATION DATE: 07/16/03

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Shaker Hill bus stop change request aired

By PAMELA MIETH

WOBURN - The School Committee heard from parents concerned about the location of their children's school bus stop at its first meeting of the year last week, but indicated it would take no action until the matter worked its way through the procedures established under the new

policy implemented this fall. The parents, whose children now walk down from Shaker Hill Lane to the corner of Crossman Road and Cambridge Road, have begun the formal process of filling out a change request form and submitting it to the principal, but also made their case to the committee members stating safety

concerns. Their stop was initially on their cul de sac, but in each of the past three years, the stop has been changed by school officials, and changed back after complaints from the parents. The parents reiterated their concerns about the traffic on Cambridge Road, the fact that there are

BUS STOP - PAGE A7

Aberjona Study Coalition -

Cambridge firm picked as consultants

WOBURN - The Aberjona Study Coalition, Inc., which has received a double Technical Assistant Grant from the Environmental Protection Agency, has chosen Cambridge Environmental, Inc. as its technical assistant and advisor to interpret the EPA reports on the Aberjona Watershed.

The coalition represents over 225,000 residents along the watershed from Woburn, Winchester, Wilmington, Medford and Arlington.

The first scheduled meeting between Cambridge Environmental and the Coalition will be to discuss the review process of the Environmental Protection Agen-

cies Phase I and Phase II Risk Assessment reports that were released earlier this summer.

A public comment deadline on these reports is due on or before October 14.

The process of a Technical Advisor selection proposal and Scope of a detailed Request For Proposal and Nine firms responded and submitted proposals for the group's evaluation.

In August, ASC evaluated the firms following the EPA's procurement guidelines. ASC determined that Cambridge Environmental, Inc. could best represent

ABERJONA - PAGE A7

Voke notes...

Superintendent gets contract, MCAS test results are updated

WAKEFIELD - The Northeast Metropolitan Regional Vocational School District School Committee emerged from their Executive Session and voted 9 to 2 in favor of accepting the negotiated contract with the school secretary and they voted 8 to 3 for the approval of the new

The unofficial MCAS scores were received and soon-to-be Superintendent Cronin stated, "We are very pleased with our results, it appears that 97 percent of our 2003 class have successfully completed the MCAS."

She also noted that the class of 2005 had an overall percentage of 69 percent passing which

Schools James Pelley Jr. stated, "The opening of school went well and there were no major problems."

Pelley reported that a total of nine cities and towns have approved the Vocational School budget and only Winchester, Woburn and Revere have not passed it.

Fallout from Winchester Council to call licenses for

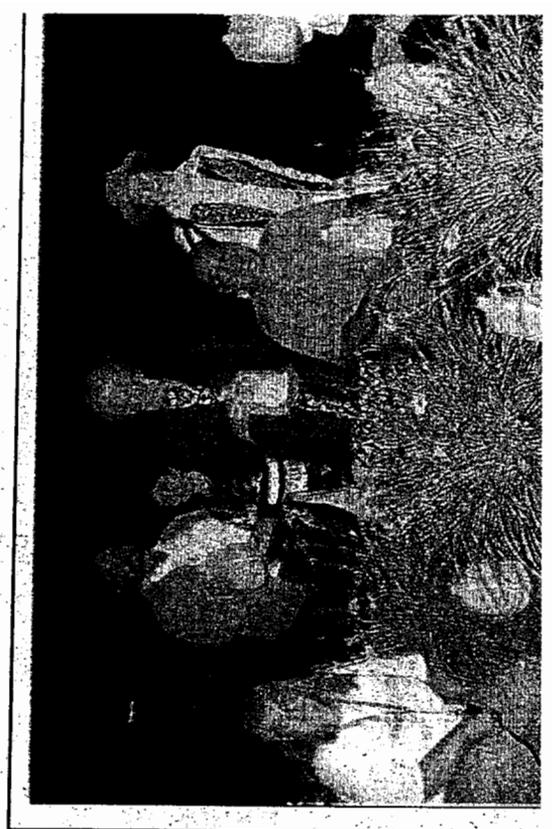
By GORDON VINCENT

WOBURN - In the wake of Winchester Hospital's acquisition of a permit for parking off Holton Street, the City Council is considering requiring all satellite parking lots in the city to be licensed.

A number of particulars need to be worked out in the council's Ordinance Committee, which began the process this week.

There are still some bitter feelings toward Winchester Hospital, which last month withdrew its application for a special permit and obtained a building permit for the parking lot,

PARJ





COMMONWEALTH OF MASSACHUSETTS
 EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 Metropolitan Boston – Northeast Regional Office

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MERRY HEALEY
 Lieutenant Governor

ELLEN ROY HERZFELDER
 Secretary

EDWARD KUNCE
 Acting Commissioner

APRIL 29, 2003

Olin Corporation
 P.O. Box 248
 1186 Lower River Road, NW
 Charleston, TN 37310
 ATTN: Stephen Morrow

RE: Wilmington
 Olin Chemical
 51 Eames Street
 RTN 3-0471
**North Pond Area Investigation: Part I;
 Conditional Approval of Part II Scope of Work**

Dear Mr. Morrow:

On December 16, 2002 the Department of Environmental Protection (DEP) received a report entitled "North Pond Study Area Investigation: Part I." The report was prepared on behalf of the Olin Corporation (Olin) by GEI Consultants, Inc. (GEI), and was reviewed and submitted by Margret Hanley, the Licensed Site Professional of Record. The purpose of the report is to present the results of a historical review of available information, and to present a Scope of Work for the collection of sediment and soil quality data, in order to determine the extent of Olin's contribution to contamination in the North Pond study area.

In accordance with the Public Involvement Plan for this site, the report was placed in the public library and a public comment period ran between February 11, 2003 and April 18, 2003. The public comments are summarized at the end of this letter, and were considered in DEP's conditional approval of this submittal.

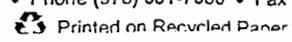
Background

A 1955 aerial photograph included in the Phase II Scope of Work for the East Ditch investigation showed a surface water drainage ditch, which traveled from west to east across the Olin property and discharged into the North Pond. The surface water drainage from the Olin site appears to have discharged into the North Pond via this ditch for a period of time between the late 1950's and the late 1970's. In a letter dated February 1, 2002, DEP required Olin to complete a Scope of Work to determine the extent to which contamination from the Olin property migrated to the North Pond area.

In a letter dated April 5, 2002 Olin proposed to address DEP's concerns in a two-part investigation. In Part I, Olin proposed to confirm the hypothesized migration pathway. In Part II Olin anticipated that additional subsurface investigations would be necessary in the vicinity of the North Pond to document any potential contribution from the Olin site to conditions in this area. The December 2002 report summarizes the results of Part I of this investigation, and presents a scope of work for Part II of this investigation.

This information is available in alternate format by calling our ADA Coordinator at (617) 574-6872.

205A Lowell St. Wilmington, MA 01887 • Phone (978) 661-7600 • Fax (978) 661-7615 • TTD# (978) 661-7679



North Pond Investigation: Part I

The presence or absence of Olin-related contaminants in the North Pond study area could not be established from the review of historical data. However, it was determined that the existence of a Massachusetts Bay Transit Authority culvert and an unnamed ditch provided a hydraulic connection and a contaminant migration pathway between the Olin property and the North Pond that could have existed between 1952 and 1982.

In addition, it was determined that the North Pond may receive groundwater discharge from the direction of the East Ditch and the Olin property. Based on the above information, GEI determined that additional investigation is necessary to assess the nature and extent of contamination that may be due to historical releases at the Olin property.

GEI concluded that compounds that may currently be present in the Unnamed Ditch, and potentially present in shallow sediment in remaining portions of North Pond, are likely due to releases since 1982 from facilities in the area other than the Olin Site. This conclusion was based on the fact that a hydraulic connection from the Olin Property to the North Pond did not exist after 1982.

North Pond Investigation Part II – Scope of Work

In order to determine the extent of Olin's contribution to contamination in the North Pond study area GEI proposes to conduct a soil and sediment quality sampling program. GEI proposes to collect fill and buried sediment samples from up to three locations within the former areas of North Pond, and one location in the remaining portion of North Pond. In filled areas, samples will be collected continuously from the ground surface to 5 feet below the buried sediment layer, to a maximum depth of 16 feet. In the remaining area of North Pond, samples will be collected continuously from the ground surface to one foot below the buried sediment layer, to a maximum depth of 4 feet.

Samples will be classified to distinguish between underlying soils, sediments, and the material used to fill areas formerly included in the North Pond. Olin will evaluate the feasibility of age dating the sediments using radiochemical techniques, if a well-defined layer of sediment is observed in each boring.

Up to four samples that are determined to include historical sediments and one shallow sediment sample from the remaining portions of the North Pond will be analyzed for volatile organic compounds including trimethylpentenes (USEPA 8260B), semivolatile organic compounds (USEPA 8270C), pesticides (USEPA 8081A), herbicides (SW-846-8151A), metals (including antimony, chromium, arsenic, cyanide, total and hexavalent chromium, lead, mercury, and thalium [various methods]), ammonia (SM4500F/Lachat), pH, chloride, and sulfate.

Other activities will also be completed as part of Part II of the North Pond Investigation. At least three samples of the fill that overlies former North Pond sediments will be tested for metals. Samples of soil at each boring location, which are judged to be below or in contact with the sediment layer will be extracted and/or preserved, for future analysis.

GEI will not conduct further investigation in the Unnamed Ditch, unless it is determined that Olin-related contaminants of concern are present in sediment at depth in the North Pond.

GEI will prepare a letter report presenting the results of this evaluation, along with any additional information regarding the source and nature of the material that was used as fill in portions of the North Pond. GEI will seek permission to conduct the sampling activities in the former areas of the North Pond.

from current property owners and from the Woburn Conservation Commission. It is anticipated that sampling can be conducted within 30 days of receiving property access and Conservation Commission approval. A preliminary report presenting the results of the field investigations will be issued within 90 days of completing the fieldwork.

Public Comments

Public comments were received from Dick Patterson, Martha Stevenson, the Woburn Neighborhood Association, and State Representative Carol Donovan. Comments were received verbally from Mr. Patterson and Ms. Stevenson in a meeting at DEP on March 27, 2003. Although a wide variety of concerns related to the entire project were discussed, the main concern regarding the North Pond Investigation was that part of the North Pond used to extend into Wilmington, and both Mr. Patterson and Ms. Stevenson wanted to make sure that the North Pond investigation extended into pertinent areas of Wilmington that could have been impacted from contamination from the Olin property. Public comments from the Woburn Neighborhood Association and Representative Donovan were received by DEP in writing on April 5, 2003 and April 16, 2003, respectively. The main concern of the Woburn Neighborhood Association and Representative Donovan was that the North Pond investigation was being completed in lieu of the East Ditch Investigation.

DEP – Response to Public Comments

The goal of the North Pond investigation is to identify the extent of any contaminants that have migrated from the Olin property to the North Pond either by surface water discharge or groundwater flow. The investigation will include pertinent areas in both Wilmington and Woburn. If necessary, the investigation may even eventually extend to water bodies downstream of the North Pond.

The East Ditch investigation is being completed in addition to the North Pond investigation and is presently underway. The progress of the East Ditch investigation was temporarily delayed due to property access issues with the Massachusetts Bay Transit Authority. The Scope of Work for the East Ditch investigation was completed by GEI consultants on behalf of the Olin Corporation and is dated October 12, 2001. DEP's conditional approval letter is dated February 1, 2002, and in this letter DEP made it clear that the full extent of contamination that may have migrated downstream through the East Ditch and beyond must be delineated.

DEP – Conditional Approval

DEP approves of the Scope of Work for the Part II of the North Pond Investigation subject to the following conditions:

- One of the soil boring locations must be located near where the Unnamed Ditch formerly discharged into the North Pond, because maximum depths of contaminated sediments would be expected to build up at the point where the higher flow velocity water from the Unnamed Ditch entered the low flow velocity water of the North Pond. It should be noted that this location is in Wilmington, and will require the approval of the Wilmington Conservation Commission.
- GEI states that groundwater flow measurements indicate that groundwater flow in the study area is southeast from the Olin Site toward the North Pond, yet no groundwater sampling was proposed to research potential contaminant transport through the groundwater flow pathway. Groundwater samples must be collected from GW-80S, GW-80D, GW-80BR, GW-74S, and GW-74D and analyzed for the contaminants of concern related to the Olin site. This data, along

with historical groundwater information from the study area, must be used to determine if groundwater contamination is migrating in shallow and deep groundwater beyond the East Ditch toward the southeast.

- It should be noted that further investigation of the sediments in the Unnamed Ditch will be required if Olin-related contaminants are identified in the North Pond sediments at levels that could pose a significant risk to public health and/or the environment.

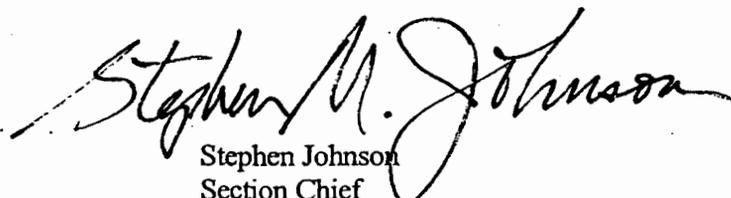
A report summarizing the results of this investigation must be submitted to DEP within 4 months of the date of this letter. Please be advised that this submittal date is being established as an Interim Deadline, pursuant to 310 CMR 40.0167.

Your cooperation in this matter is appreciated. If you have any further questions regarding this matter, please contact Christopher Pyott at (978) 661-7739 or at the letterhead address.

Very truly yours,



Christopher Pyott
Environmental Analyst
Site Management



Stephen Johnson
Section Chief
Site Management

cc via e-mail:

Wilmington Board of Health, Attn: Greg Erickson
Wilmington Water Department, Attn: Mike Woods
DEP/NERO/Water Supply, Attn: Jim Persky
DEP/Boston/Legislative Liaison: Marc LaPlante
Sleeman, Hanley & DeNitto, 50 Congress Street, Boston, MA 02109
Attn: Margaret Hanley
MACTEC Engineering and Consulting, 107 Audubon Road, Wakefield, MA 01880
Attn: Michael Murphy
Foley, Hoag & Eliot LLP, 155 Seaport Boulevard, Boston, MA 02210
Attn: Laurie Burt
Senator Bruce Tarr, Room 507, State House, Boston, MA 02133
Rep. James Miceli, Room 167, State House, Boston, MA 02133
Rep. Charles Murphy, Room 166, State House, Boston, MA 02133
Rep. Carol Donovan, Room 473-B, State House, Boston, MA 02133

cc via mail:

DEP/Data Management
Kathleen & Winifred Barry, 14 Powder House Circle, Wilmington, MA 01887
Robert Cain, Chairman, Board of Selectmen, 121 Glen Road, Wilmington, MA 01887
Mayor John Curran, City Hall, 10 Common Street, Woburn, MA 01801
Jack Fralick, Board of Health, City Hall, 10 Common Street, Woburn, MA 01801
Wilmington Public Library, 175 Middlesex Avenue, Wilmington, MA 01887
Attn: Olin Site Repository



COMMONWEALTH OF MASSACHUSETTS
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 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 Metropolitan Boston – Northeast Regional Office

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 SECRETARY
 BOB DURAND
 Secretary
 LAUREN A. LISS
 Commissioner

FEB 01 2002

Olin Corporation
 P.O. Box 248
 1186 Lower River Road, NW
 Charleston, TN 37310
 ATTN: Stephen Morrow

RE: Wilmington
 Olin Chemical
 51 Eames Street
 RTN 3-0471
**Additional Phase II Investigations of the East Ditch;
 Conditional Approval, Additional
 Investigation Requirements**

Dear Mr. Morrow:

On October 12, 2001 the Department of Environmental Protection (DEP) received a Scope of Work entitled "Additional Phase II Investigations of the East Ditch." The Scope of Work (SOW) was prepared on behalf of the Olin Corporation by Harding ESE, Inc. with the assistance of Geomega, Inc., and was reviewed by Margret Hanley, the Licensed Site Professional of Record. The SOW describes additional investigation activities that will be completed to define the nature and extent of contamination in the East Ditch that can be attributed to past activities at the Olin Property.

BACKGROUND

The Olin Property in Wilmington is a former chemical manufacturing facility that has been owned and operated by various companies since the early 1950's. Olin is in the process of investigating the extent of contamination from prior releases at the Property, in accordance with the Phase II Site Characterization requirements in the Massachusetts Contingency Plan. Chemicals of concern that may have entered the East Ditch from the Olin Property include the inorganic chemicals ammonia, chromium, sulfate, chloride and sodium, and the organic compounds n-nitrosodiphenylamine, phthalates, and trimethylpentenes. A chromium-containing floc is also known to migrate into the East Ditch from the Olin Property via surface water flow from the South Ditch.

PHASE II EAST DITCH SCOPE OF WORK

The East Ditch is a narrow and shallow surface water drainage ditch that flows along the east side of the Olin property through a heavily industrialized area. Surface water drainage from the Olin property enters the East Ditch approximately 3/8 mile south of Eames Street. The East Ditch continues to flow to the South and turns into the New Boston Street Drainway, which was addressed as part of cleanup activities for the Industri-Plex Site. The New Boston Street Drainway flows South and discharges into Hall's Brook, than into Hall's Brook Holding Area, and eventually into the Aberjona River.

Olin proposes to complete the following investigative activities in order to assess the extent of their potential contribution to sediment and surface water contamination in the East Ditch:

- Additional assessment of sediment and surface water quality will be performed in the unculverted portions of the East Ditch to the east and south of the Property. Sediment and surface water samples will be collected upstream and downstream of the confluence with the South Ditch, and analyzed for contaminants of concern.
- An ecological characterization will be performed to identify potential ecological receptors that are present in the East Ditch. Aquatic populations will be sampled, evaluated, and compared to background areas in order to determine the degree of impairment.
- The bioavailability of floc, and its potential impact on ecological receptors in the East Ditch and at downstream environments, will be evaluated.
- The information collected as part of this investigation will be used to update both human health and ecological risk characterizations for the East Ditch.

CONDITIONAL APPROVAL

DEP believes that further investigative work is necessary to determine the extent of contamination in the East Ditch from releases from the Olin Property, and the potential for this contamination to impact human health and environmental receptors. DEP approves of the SOW for the Supplemental Phase II Investigation, but the following activities also must be completed:

- In order to define the full extent of contamination in the East Ditch, surface water and sediment samples must be collected in the New Boston Street Drainway (and potentially further downstream) and analyzed for the contaminants of concern. DEP is concerned that the New Boston Street Drainway, which was remediated by 1998 as part of the cleanup of the Industri-Plex Superfund site, may have become recontaminated from releases from the Olin property to the East Ditch.
- The information collected must be used to complete human health and ecological risk characterizations for the additional areas investigated.
- All of the additional data must eventually be included in human health and ecological risk characterizations which address conditions for the entire site.

DEP understands that one year is required in order to evaluate chemical and ecological conditions in the East Ditch during a range of seasonal conditions, so a summary report describing the results of all of the information collected during completion of the Phase II SOW for the East Ditch must be submitted to DEP within one year of the date of this letter. However, parts of the investigation should be completed more quickly. Therefore, a report summarizing the results of the sediment sampling must be submitted to DEP within three months of the date of this letter, and a report summarizing investigations completed to determine the bioavailability of the floc must be submitted to DEP within six months of the date of this letter. Please be advised that these dates are being established as an Interim Deadlines, pursuant to 310 CMR 40.0167.

FORMER DRAINAGE DITCH AND NORTH POND – INVESTIGATION REQUIRED

The 1955 aerial photograph included in the Phase II SOW for the East Ditch shows a surface water drainage ditch, which travels from west to east across the Olin property and discharges into the North Pond. The surface water drainage from the Olin site discharged into the North Pond via this ditch

Wilmington: Olin Corporation
RTN: 3-0471
Additional Phase II Investigations of the East Ditch
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for an unknown period of time, although Olin indicates that this drainage ditch was not evident in a 1963 aerial photograph of the area. The extent to which contamination from the Olin property migrated to the East in these water bodies needs to be investigated. Surface water and sediment quality samples must be collected from the North Pond. In addition, a soil boring and soil sampling program will be necessary to

determine if contamination still exists in areas of the former drainage channel and the North Pond which were filled in the 1970's to make way for the development of Presidential Way and the Bay State Bindery facility.

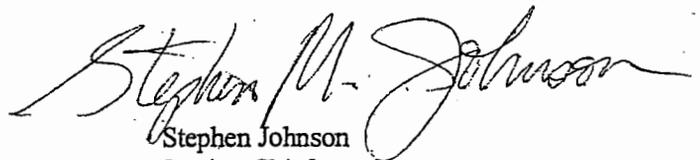
A supplemental Scope of Work must be submitted to DEP to address the additional activities listed above. The supplemental Scope of Work must be submitted to DEP for review within 90 days of the date of this letter. Please be advised that this date is being established as an Interim Deadline, pursuant to 310 CMR 40.0167.

Your cooperation in this matter is appreciated. If you have any further questions regarding this matter, please contact Christopher Pyott at (978) 661-7739 or at the letterhead address.

Very truly yours,



Christopher Pyott
Environmental Analyst
Site Management



Stephen Johnson
Section Chief
Site Management

cc: Wilmington BOH
Wilmington Water Department
Wilmington Conservation Commission
Data Management: SOW
DEP/NERO/Water Supply, Attn: Jim Persky
DEP/NERO/BWSC, Attn: John Fitzgerald, Regional Engineer
Sleeman, Hanley, & DeNitto, 63 St Botolph Street, Boston, MA 02116
Attn: Margret Hanley
Geomega, 2995 Baseline Road, Suite 202, Boulder, CO 80303, Attn: Andy Davis



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LOCAL NEWS

High levels of arsenic found at Leonard Field

By Kristina Arvanitis / Staff Writer
Thursday, October 9, 2003

The routine grading of Leonard Field came to a halt last week when soil testing revealed elevated levels of arsenic in the northwest corner of the field next to the basketball court.

Although arsenic is a naturally occurring material in soil due to the release of the substance when rocks decompose, the state Department of Environmental Protection (DEP) sets an acceptable soil arsenic limit of 30 parts per million (ppm). In other words, out of a million grains of soil, only 30 of those grains can be pure arsenic.

According to Joseph Tabbi, the town's acting-health director, soil from the field was scraped from the surface and placed into a large pile in order to be screened for volatile and semi-volatile organic material, petroleum, hydrocarbons and heavy metals. Out of the 10 samples that were taken at various locations of the pile, it was found that one sample tested at 37 ppm of arsenic.

Ian Phillips, a scientist at the Burlington environmental consulting firm Roux Associates, is certified to conduct the sampling on the site and has been working with the town to determine how much soil must be removed from the field before the rehabilitation can continue. Further testing targeted the basketball court area as the source of the elevated arsenic levels, and after 22 more test kits of the area were taken, the highest concentration of arsenic was found to be more than 50 ppm.

"We're trying to narrow that down further in order to find out how much material we'll have to remove so that we can go forward and close the area up," Phillips told the Board of Selectmen on Monday evening.

Both Tabbi and Phillips stressed that the findings pose no risk to neighbors or workers on the site and stressed that they had been working with the DEP since the arsenic was first detected.

"The area was sealed off," Tabbi said. "During the time that there was no fencing there we did have someone from the [Department of Public Works] for security purposes."

Jim Johnson, chairman of the Board of Selectmen, asked about the toxicity of the element

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and whether there was a chance that soil on the premises would have posed a risk to people visiting the field.

"The toxicity of arsenic means you would have to ingest quite a bit," Phillips answered, adding that a person would need to swallow the equivalent of a "zip-lock bag full of soil each year" for an extended time period in order for the arsenic to pose a cancer risk. "Arsenic is a naturally occurring element. We couldn't dig up all the soil and get to zero."

Testing on the site is ongoing, and further efforts must be conducted to determine how much soil should be removed from the field. After the soil is taken away, it will be disposed in a landfill designated for substances with a high concentration of potentially dangerous materials.

Phillips said they had not yet determined the cause of the high levels of arsenic in the soil, but remarked that previous businesses would not be a likely contributor to arsenic levels.

"We don't know the source of it," he said. "We know that there was no facility on the site that would cause the higher levels of arsenic."

This is not the first time elevated levels of arsenic have been detected at Leonard Field and other Winchester athletic fields.

In April 1999, town health officials announced that U.S. Environmental Protection Agency tests found levels of arsenic as high as 68 ppm at areas surrounding Leonard Field, Davidson Park and Winchester High School.

At the time, some Board of Health members believed that the arsenic findings were due to recent flooding and that contamination was most likely caused by heavy metals present in the Aberjona River. One Board of Health member surmised that the "tanning industry or some other industrial activity" in Woburn may have been responsible for the presence of the heavy metals and that the Aberjona was diverting arsenic into Winchester.

Information from the archives of The Winchester Star was used in this report.

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