

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023OFFICE OF THE
REGIONAL ADMINISTRATOR

June 8, 2001

Mr. Joseph J. Joseph
Alewife Study Group
20 Kassul Park
Cambridge, Massachusetts 02140

Dear Mr. Joseph:

Thank you for your letter of June 5, 2001, requesting on behalf of the Alewife Study Group and North Cambridge residents that the U.S. Environmental Protection Agency (EPA) "immediately enjoin W.R. Grace from excavating a utility trench at their facility at 62 Whittemore Ave., Cambridge, MA scheduled to commence on June 9, 2001."

It is my understanding, based on conversations between my staff and the MA DEP, that the start of the utility trench excavation has been delayed from Saturday, June 9, until next Friday, June 15.

Actions such as the utility trench excavation at the W.R. Grace facility are carried out under the authority of the Massachusetts Department of Environmental Protection's (DEP) State Superfund (21E) program, and must follow procedures outlined in the DEP-approved site-specific Release Abatement Measure (RAM) plan. In addition, the work at this site is being performed under an Asbestos Soil Management Plan (ASMP) required by the City of Cambridge's Asbestos Protection Ordinance, which is administered by the Cambridge Health Alliance.

The DEP and Cambridge Health Alliance were involved with the development and plans for implementation of the Final Utility Trench Release Abatement Measure (RAM) Plan/Asbestos Soil Management Plan (ASMP), dated May 3, 2001; they have reviewed the Plan and made comments on its draft form. Their final review of this plan has led them to the determination that the actions planned at the Whittemore Avenue Facility are protective of public health and welfare, due to the extensive protective measures and monitoring planned. Representatives of these City and State agencies have discussed the Plan's contents with EPA.

Procedures to be followed during the trench excavation in compliance with the approved RAM/ASMP include the following:

- Establishment of a segregated and restricted work zone, taking advantage of buildings standing along the proposed excavation route as barriers.
- Prevention of dust release during excavation of materials by use of engineering controls, including wetting soils with water spray, keeping exposed fill wet while digging, covering exposed fill areas after work hours, placing a geotextile layer above present fill materials before placing electrical conduit and clean backfill, keeping handling of excavated soil to a minimum, and immediately placing excavated fill into lined and placarded containers.
- Decontamination of equipment and personnel before leaving the work zone.
- Proper management of decontamination water and materials.

- Performance of air monitoring to verify air quality for site workers, and nearby workers and residents, by the following methods:
 1. use of personal air sampling pumps and filters for worker monitoring, with results to be compared to applicable Occupational Health and Safety Administration (OSHA) standards;
 2. perimeter work zone hi-volume air sampling units, to assure that no impacts off-site are caused by on-site activities;
 3. real-time dust monitoring, to be conducted upwind and downwind of work areas, with average hourly results to be compared to the National Ambient Air Quality Standard for total suspended particulates smaller than 10 micrometers;
 4. real-time fiber monitoring downwind of the work area, with results used to determine if work needs to be stopped, or further engineering controls undertaken.
- Containing fill materials immediately after excavation, and disposal of the fill materials as "Special Waste".
- Documentation of site activities through a Response Abatement Measure (RAM) Completion report, which will be generated and distributed after work completion.
- Notification of the DEP and the City of Cambridge, along with persons on the Public Involvement Plan list, of the date for start of work at least one week prior to the start of intrusive activity on site.

EPA is aware that the federal Agency for Toxic Substances and Disease Registry (ATSDR) has received your request for a health assessment to be performed for the W.R. Grace site. ATSDR has informed EPA that the health assessment is in progress. You may contact William Sweet, of ATSDR's Boston office, for information on the progress of the health assessment. He may be reached at (617) 918-1495.

Based upon these factors, I believe that the DEP and the Cambridge Health Alliance are providing proper review and oversight of activities at the W.R. Grace facility in North Cambridge. I appreciate your bringing the concerns of the Alewife Study Group to my attention.

Sincerely,



Ira W. Leighton
Acting Regional Administrator

cc: U.S. Senator Edward Kennedy
U.S. Senator John Kerry
U.S. Congressman Michael Capuano
State Senator Robert Havern
State Senator Steven Tolman
State Representative Alice Wolf
Cambridge City Council
Lauren Liss, Commissioner, MA DEP
Patricia Donahue, MA DEP
William Sweet, ATSDR
John Wardzell, W.R. Grace & Co. - Conn.
William Beck, LSP, Haley & Aldrich

2665

Communication #1

A communication was received from the Department of Environmental Protection (DEP), transmitting a copy of DEP's letter to Joseph J. Joseph regarding W.R. Grace excavating a utility trench at 62 Whittemore Avenue.

In City Council June 25, 2001

PLACED ON FILE