

Baran, Cynthia (DEP)

From: Baran, Cynthia (DEP)
Sent: Tuesday, December 07, 2004 9:43 AM
To: Hobill, Jonathan (DEP); Kiernan, Kevin (DEP)
Subject: FW: Eagle Gas, Carver, RTN 4-17582
Attachments: Reduced Eagle Site Plan 120604.pdf

Jon & Kevin:

FYI.

It looks like Eagle Gas and Jim Decoulos are beginning to understand our concerns.

Although I am hopeful that this is a sign that Eagle Gas will be back on track soon, what was REQUIRED in the IRA Plan Denial with Interim Deadline letter was that an IRA Plan Modification to continue to operate the unapproved passive recovery system (on an interim basis until an active recovery system is properly designed, approved and installed) be submitted by yesterday at 5 p.m. This plan was not submitted in accordance with 310 CMR 40.0424 nor is it addressed at all in the e-mail below (sent at 11:23 p.m. last night). How would you like to proceed?

Jon, do you feel that there are any additional substantial issues that we discussed last week that are not outlined below?

Please let me know.

Thanks. -Cynthia.

-----Original Message-----

From: James J. Decoulos [mailto:jamesj@decoulos.com]
Sent: Monday, December 06, 2004 11:23 PM
To: Baran, Cynthia (DEP)
Cc: Dave Bennett
Subject: Eagle Gas, Carver, RTN 4-17582

Cynthia,

Based upon our meeting last Thursday, December 2nd with Jon Hobill, deficiencies and action steps were identified that require immediate attention. These tasks are as follows:

1. Delineate the extent of NAPL to the northeast (under the Main Street right-of-way) and to the southeast (along the façade of the building and underneath the slab of the building).
2. Transport and dispose remediation waste from the station and brook outlet area. The waste stream includes recovered NAPL; contaminated soil generated from drilling in August (currently stored on the southeast side of the building under an awning); and, remove spent booms and pads from the outlet area (including spilled interior boom material on the ground).
3. Prepare an Imminent Hazard Evaluation pursuant to 310 CMR 40.0426. Continue to evaluate the threat of the NAPL plume flow becoming a condition of Substantial Release Migration.
4. Conduct a records review with the MA Highway Department – District 5 to determine if any field construction notes, as-built plans, contractor records or photographs are available from the construction of the stormwater collection system within the Main Street right-of-way. See <http://www.mhd.state.ma.us/mhd/dist/dist5.htm>
5. Evaluate regional, state and federal grant programs available to finance the remediation of the outlet area (and avoid last minute snags for proposal deadlines).
6. Evaluate brownfield loan and grant programs to redevelop the Site (Carver is listed as an Economically Distressed Area under the Brownfields Law). See <http://www.mass.gov/dep/bwsc/files/brown/eda.htm>
7. Prepare an IRA Completion Report to end RTN 4-17825 (see comments from your letter dated April 5, 2004).

8. Conduct a percolation test or obtain field notes of soil testing from Webby Engineering/Carver Board of Health to determine suitability of discharging treated groundwater into a subsurface leaching facility.
9. Control the sheen at the stormwater outlet with proper boom and pad placement. Booms need to be set to account for a minimum of three foot fluctuations in the brook surface water elevation. A schedule for replacement of the booms and pads must be submitted.
10. Negotiate an access agreement with the owner of the land at the stormwater outlet area following the provisions of Site Access Authorization at 310 CMR 40.0173.
11. Complete access agreement to conduct remedial actions within the Main Street right-of-way.
12. Provide at least two cross sections of the subsurface - perpendicular to the 15 inch concrete stormwater drain pipe in front of the Site.
13. Provide a Health and Safety Plan for NAPL recovery and the construction of any NAPL recovery trench.
14. Provide a groundwater sampling plan with procedures, protocols and a schedule.

After leaving your office on the 2nd, Najib and I visited Assistant Town Administrator Jean Bouchard and Carver DPW Superintendent Bill Halunen.

Jean informed us that the access agreement approved by the Selectmen referred to the IRA Plan dated June 15, 2004. If changes are proposed to the trench layout in that plan, I need to go before the Selectmen on December 14th to obtain their approval.

Bill provided us with a road opening permit and we discussed the logistics of constructing a trench within the roadway. By far, the greatest concern is the approaching inclement weather. We cannot be opening the roadway during icing or snow conditions and we must ensure that the asphalt plants remain open.

The area of further NAPL delineation was marked for DIGSAFE and drilling has been scheduled for Friday, December 10th with Technical Drilling Services (TDS). TDS will use a track mounted GeoProbe 54DT and we have scheduled a police detail with two officers.

Observations at the outfall area reveal that the source of the sheen is the heavily contaminated southwesterly bank in the outfall area – not the stormwater outflow. This condition was observed during dry conditions and may change during a wet flow.

A formal written response to your denial of the IRA Plan Modification dated November 26th shall be submitted to you on Monday, December 13th. The response will be our last effort to modify the IRA Plan and will incorporate your concerns from the denial as well as the issues reviewed during our meeting on December 2nd. Until that time, we propose sampling of the following groundwater monitoring wells on a quarterly basis (in order):

- BP-1, BP-2, DCW-6, DCW-5, DCW-2, DCW-4, DCW-1 and four new wells to be established on December 10th shall all be sampled for EPH.
- BP-1, BP-2, DCW-2 and DCW-1 and at least two new wells established on December 10th shall be sampled for VPH.

We anticipate sampling the groundwater on or about December 14th. Additional sampling shall occur the last weeks of March, June, September and December of 2005. Detailed procedures and protocols for sampling shall be provided in next week's formal modification.

Lastly, no surface water or sediment is proposed for sampling at the stormwater outfall. Three surface water

samples analyzed for EPH at the outfall in May of 2003 identified the C9-C18 Aliphatic fraction at an average concentration of over 2,000,000 ug/l. The benefit of additional sampling is questionable until a comprehensive remedial action can be conducted. Maintenance and replacement of absorbent booms and pads shall be the primary temporary response action at the outfall. We will need to discuss this issue further.

As you requested, attached is a reduced site plan (in tabloid size or 11x17 inches) of the main site plan saved in PDF format. I will provide extra copies of the revised 24x36 inch site plan next week.

Jim

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DATE MAY 2004
SCALE 1" = 40'
DRAWN BY JLM
CHECKED BY JLD
APPROVED BY JLD
SHEET NO. 1