- Copy -

TOWN OF DEERFIELD

Board of Selectmen & Board of Health
8 Conway Street
South Deerfield MA 01373
Voice: 413.665.4645
Facsimile: 413.665.7275

February 12, 2007

Mr. Steven Calder
NPDES Water Permit Program
EPA New England
1 Congress Street, Suite 1100 (CIP)
Boston, MA 02114

Dear Mr. Calder:

The Town welcomes the opportunity to comment on Pan Am Railway's (Pan Am, also known as B&M Railroad) Storm Water Pollution Prevention Plan (SWPPP) and EPA's attention to this matter. With Pan Am's documented history of noncompliance with local, state and federal environmental regulations and history of hazardous releases, the need for EPA oversight to ensure safe management of hazardous materials at the rail yard is essential to prevent further release and migration of site contaminants into storm water and the environment. The Town expects EPA will exercise its regulatory authority and expertise to control Pan Am's activity which has contaminated a potential drinking water source for the town, potentially threatens a federally endangered species, and can produce an adverse impact on the Connecticut River.

The Board of Health is concerned about the release and migration of hazardous materials into the storm water and ultimately the groundwater and the Connecticut River based on the following site issues, including:

1. The presence and potential for release of many types of hazardous materials used, stored and transported throughout the rail yard, including the continued migration of contamination already documented in site soils from previous hazardous releases.
2. The toxicity of materials (PCBs, heavy metals, petroleum-based products, among others) and the potential for release and bioaccumulation of these hazardous materials.
3. The permeability of some site soils and site fill together with the shallow depth to groundwater (3 to 12 BGS) which feeds a potential drinking water source for the town.

The SWPPP is a critical document because of EPA's position that "the SWPPP is considered a non-numerical effluent limitation for the storm water discharges." The Town finds the SWPPP submitted by Pan Am to the EPA will not adequately serve the function of an "effluent limitation" because:

1. The SWPPP does not provide adequate details about hazardous materials used and stored at the site, transported throughout the rail yard, how those materials might contaminate storm water, and how that potential for contamination will be mitigated.
2. The SWPPP does not thoroughly address the secondary containment issues for all hazardous materials requiring such containment. Nor does it provide a schedule for implementation of the

final SWPPP recommendations which refer to mitigation of only a limited number of the containment and other SWPPP issues.

3. The minimum conditions for Best Management Practices (BMP) for this type of facility under the SWPPP requirements (Part 4 of EPA NPDES Storm Water Multi-Sector General Permit for Industrial Activities and Sector P - Land Transportation, Subsector - Railroad Transportation) have not adequately been met to control storm water discharges from activities that could contribute pollutants to waters.
4. The SWPPP does not provide adequate information about their emergency response system for all types of hazardous materials. The SPCC Plan for oil spill prevention was referenced, but not attached, so it cannot be assessed for its adequacy. Other than referencing the SPCC Plan, the SWPPP does not address emergency response for other types of hazardous materials used at the rail yard and transported through the yard.
5. It does not address the fact that there are areas of contaminated soils documented under a recent Massachusetts Contingency Plan (MCP) investigation. These contaminated soils will not be cleaned up as part of the remedial process and the contamination can continue to migrate via storm water.
6. It does not mention potential spills from railcar accidents, such as the recent one on July 13, 2005, when a fuel tank on a locomotive was ruptured when hit by a passing railcar. It resulted in a release of 750 gallons of diesel fuel to the soils and groundwater.

Based on the Board's review of the so-called East Deerfield Rail Yard SWPPP, the comments by the Hazardous Waste Coordinator and the Connecticut River Watershed Council (CRWC) the Town recommends that EPA require Pan Am to conduct the following actions:

1. The SWPPP submitted to the EPA is dated July 28, 2005 but the final NPDES permit was issued on August 15, 2006. Pan Am must revise the SWPPP to incorporate information from their newly issued (2006) permit, rather than submit a plan that antedates the permit.
2. Review written concerns from the CRWC and Ms. Rose's comments prepared for the Town.
3. Hold a public hearing on this SWPPP under the Clean Water Act. This is a request that both the CRWC and the Deerfield Sustainable Development Committee initially made in earlier comments on the NPDES draft permit itself.
4. Resubmit a new SWPPP as soon as possible with a schedule for implementation of all SWPPP recommendations.

We appreciate your consideration of these requests. Please do not hesitate to contact this office should you require additional information or need to further discuss the matter.

Sincerely,

Bernard R. Kubiak, MPPA
Town Administrator

enc: Deerfield Hazardous Waste Coordinator, Comments on the Storm Water Pollution Prevention Plan, East Deerfield Rail Yard (December 22, 2006).
Connecticut River Watershed Council, Comments on the East Deerfield Railyard SWPPP (nd).

pc: Hon. John Olver, US House of Representatives
Chalita Belfield, Facilities Manager, Massachusetts Executive Office of Transportation

From: Lynn Rose, member of the Deerfield Sustainable Development Committee, Deerfield Planning Board and Deerfield Hazardous Waste Coordinator

To: Deerfield Selectboard

Date: 12/22/06

RE: Submittal of Comments for your consideration on the *Stormwater Pollution Prevention Plan* (SWPPP) by B&M Railroad as part of their NPDES permit process for the East Deerfield Railyard Submitted 11/22/06

Comments

Site Plan Figure 2 – the MSGP requires a legible site map with locations of structural BMPs, locations of all surface water bodies, locations where major spills or leaks have occurred, and locations of activities exposed to precipitation. As a detailed illustration of those requirements, the map/plan should identify the following:

- All surface water bodies and underground water features and structures that convey them (see Attachment 2 – Underground Utilities at the East Deerfield Railyard, including;
  - Wetlands, fire pond (on current site map), perennial streams
  - underground stone culvert
  - Septic Systems (three of the site soils types are rated severe for septic systems)
  - Outfalls (on current site map)
- Locations of outside and inside storage of:
  - hazardous products
  - the Hazardous Waste Storage Building and satellite accumulation areas
- All historic and current releases of hazardous materials.
- Location of all activities and related facilities at railyard:
  - Fueling vehicles and locomotives
  - Locomotives and boxcars services
  - Switching batteries
  - Transformers
  - Where railcars are cleaned out
  - Where locomotives are painted and body work is conducted
  - Transfer and loading areas where cargo from railcars is transferred to other vehicles or railcars
  - Parking areas – paved and unpaved
  - Hazardous waste sludge tank outside the WWTP building.

2.3.1 PP Team

It is unclear if the Environmental Manager is a staff person for B&M/Pan-Am railroads in general or specific to the East Deerfield rail yard. Is the person located on-site, or based in Billerica, MA? Please provide a schedule that delineates what and when the Environmental Manager and other on-site staff will conduct the specified activities.

2.4 Amendment of Plan

Please define what the types of "changes" at the facility that would have a "significant effect" on the potential to discharge pollutants to the state waters that would prompt a plan amendment.

3.1 Location and Natural Features

Flood Zone - Please provide a flood map that indicates where the 100 year and the 500 year flood lines are located in proximity to the railyard boundaries and features such as the DAF WWTP, chemical storage areas, storage tanks, contaminated soils identified in the MCP investigations, railroad tie storage, switching batteries, etc.

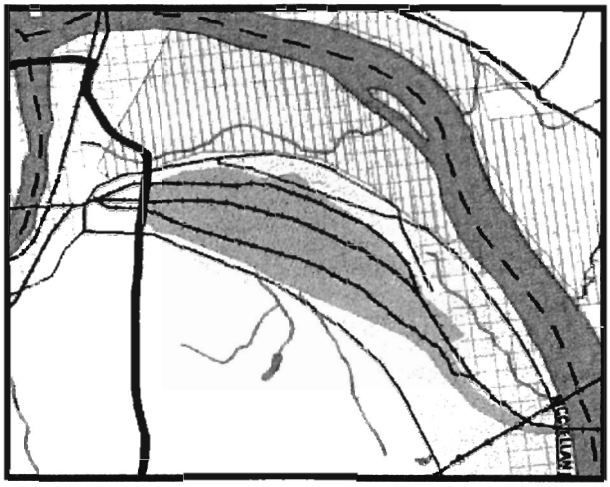
Other information about the site's natural features that should be specifically addressed in the SWPPP includes the following:

1. *Contaminated Soils* - There are 4 active hazardous release sites regulated under the Massachusetts Contingency Plan which are underlain by a Potentially Productive Medium Yield Aquifer. Some of the petroleum contamination is in the soils which B&M has decided to not actively mitigate. Thus the contamination will continue to migrate through surface water runoff and migration through the soils into the groundwater.
2. *Water Table* - The site depth to the very shallow water table is 3 to 12 feet below ground surface. Stormwater outfall pipes have been observed to be flowing during dry weather, possibly indicating that the pipes conducting stormwater flow also have infiltration from groundwater on site.
3. *Site Fill Material* - Much of the site has been filled with coal ash from the steam engines. Can B&M clarify how that affects the porosity of the site surface and the potential contaminants that could be leached from the fill into the surface water?
4. *Site Soils* – Please discuss how the following soil profiles found at the site affect the stormwater runoff. The site soils include: (information quoted from *Soil Survey, Western MA, USDA 1967*)
    - Hb - Hadley very fine sandy loam 133
        - Well drained
        - Subject to infrequent flooding
        - Rated severe for septic tank, sewage effluent disposal
    - Mu - Muck 142
        - Very poorly drained
        - Not suitable for engineering purposes
        - Have very severe limitations for urban use
    - Af - Agawam fine sandy loam 112
        - Well drained
    - Lk- Limerik silt loam 137
        - Poorly drained
        - Subject to flooding
        - High water table at or near surface for 7 or more months of the year
        - Rated severe for septic tank, sewage effluent disposal
    - Ww - Winooski fine sandy loam 160
        - Moderately drained
        - Subject to flooding
        - Rated severe for septic tank, sewage effluent disposal

3.4 Sensitive Receptors

- *Drinking Water Sources* –The B&M rail yard is located within a potentially productive medium yield aquifer (light green), however; the rail yard property has been classified as a non-potential drinking water source area (gray) due to its industrial use (see Figure 1 below). The part of the aquifer located immediately adjacent and downgradient to the site *is* considered a domestic drinking water source, and is a receptor. Through B&M's MCP investigation of several recent and historic releases of hazardous materials, B&M determined that the section of the aquifer that is a potential domestic drinking water source is contaminated with chlorinated solvents from operations at the railyard.

Figure 1: Excerpt from USGS Topographic Map



- *Endangered Species*
    - *Short-Nosed Sturgeon* – federally endangered species
    - *Dwarf wedge mussel* – federally endangered species
    - *Bald eagle* – federally threatened species
- *Sensitive Habitat*

  The Natural Heritage and Endangered Species Program (NHESP) found in 1996 an Estimated Habitat for Rare Wetlands Wildlife (checkered lines in figure 1) to be located along the Connecticut River. Adverse impacts to the surface can greatly affect vulnerable animal habitats. Less than 1/8-mile from the northern border of the rail yard is an area of protected and recreational open space (horizontal lines in figure 1).

3.5 Site Activities

- The SWPPP does not mention the transfer and inside and outside storage of equipment and hazardous materials as an integral part of site activities. Please see section Potential Pollutant Sources. The SWPPP should address how handling these materials could possibly impact stormwater, such as spills, leaks, etc. and how the BMP's will prevent these situations.
- Notes from a NPDES site visit by EPA Steve Calder on May 28, 2004 indicated that the operator of the wastewater treatment plant said that sludge from the plant is pumped to a hazardous waste tank outside the building. The sludge is transported off site by Cyn Environmental. The SWPPP should describe the location of this tank and the containment around it. The transfer procedure for transporting the sludge off site should also be explained.

- The SWPPP does not address the fact that significant amounts of hazardous materials pass through the railyard on a daily basis. It should identify:
    - The frequency, types and amounts of hazardous materials that pass through the yard.
    - History of spills from railcar accidents, such as the recent one on July 13, 2005, when a fuel tank on a locomotive was ruptured when hit by a passing railcar. It resulted in a release of 750 gallons of diesel fuel to the soils and groundwater. It was given a release tracking number of 1-15823 by DEP. A Tier II classification has been submitted to DEP.[1]

[1] IRA Status Report 11/21/06 for B&M by Wesson and Sampson Engineers, Inc.

- The potential impacts of how a spill would potentially impact the stormwater, and how B&M's emergency response system will respond to a spill.

3.6 Construction Projects

- How will stormwater be handled for construction in areas where petroleum contamination has been identified in soils under the recent MCP investigation?

4.1 Inventory of Materials

- Please provide a schedule for the review of chemical types and quantities stored in your *Table 1 Inventory.*
- *Table 1* is titled and only refers to oil-filled (and some other petroleum based) equipment. It does not list here or in 4.2. other types of hazardous products that are typically used at a railyard. See 4.2 below for list of possible other materials.

4.2 Potential Pollutant Sources

Need to address the following pollutant sources in the SWPPP:

- Degreasing products – what solvent and detergent products are used and stored for decreasing parts?
- Vehicle and locomotive maintenance products – such as carburetor cleaner, vehicle cleaning products, etc.
- Autobody products for service vehicles and railcars - paint, paint thinners and strippers, body filler products, metal working fluids, etc.
- Switching batteries – contain heavy metals. Note their locations throughout the yard. See 4.3.1 for containment questions.
- Railroad Ties – how many are there and where are the new and old located at this time? EPA Steve Calder noted on a NPDES site visit on May 28, 2004 that "hundreds of new cresol railroad ties were being stored in a clearing to one side of Outfall #006."
- See 4.3.1 for containment questions.
- Transformer Fluid with PCBs - in 3 transformers. See 4.3.1 for containment questions.

4.3 Areas of Potential Pollutant Contact

- *Location and identification of activity* - Need to identify each separate area where industrial materials or activities are exposed to stormwater and list pollutants associated with each of those activities.
- *Areas of Contact not identified and addressed in SWPPP:*
    - Leaks of diesel and other locomotive fluids from train engines and fuel tanks coming through the yard which could be potentially distributed over the length of the rail tracks.
    - Leaks of hazardous materials from cargo on railcars and tanks which could be potentially distributed over the length of the rail tracks.
    - Arsenic leaching from actively used and old abandoned railroad ties.
- *Management of Hazardous Product Storage and Waste Accumulation Areas*
    - What is the RR's hazardous waste generator status – large quantity or small quantity? This will determine the 310 CMR 30.000 requirements for accumulation and disposal of hazardous waste to prevent releases to the environment.

- Are the products in the hazardous product storage areas and in the hazardous waste accumulation areas segregated into compatible categories to prevent chemical reactions and releases to the environment?
- Is the waste accumulation area outfitted with emergency response systems based on Generator Status to respond in a timely way to a release to the environment?
- Is the waste accumulation area floor bermed to prevent the mixing of incompatible wastes to prevent to a release to the environment?
- Are you compliant with these additional generator requirements:

This matrix does not reflect ACUTELY Hazardous waste

	Regulatory Status		Hazardous Waste Management Accumulation Limits		Waste Oil Management Accumulation Limits		Transport Requirements		Management Requirements		
	Hazardous Waste	Waste Oil	Time (Days)	Volume in Tanks and Containers (kg)	Time (Days)	Volume in Tanks and Containers (kg)	Must Use Manifest	May Self Transport Haz Waste and/or Waste Oil	Accumulation Area Standards	Emergency Preparedness	Personnel Training & Contingency Plans & Emergency Response
NOTIFICATION TO EPA	LQG	LQG	90	NO LIMIT	90	NO LIMIT	YES		YES		YES
	LQG	SQG	90	NO LIMIT	180	6000	YES		YES		YES
	LQG	VSQG	90	NO LIMIT	NO LIMIT	1000	YES*	$YES_{(HCl)}$	YES		YES
	LQG	NONE	90	NO LIMIT	N/A	N/A	YES		YES		YES
	SQG	LQG	180	6000	90	NO LIMIT	YES		YES	YES	
	SQG	SQG	180	6000	180	6000	YES		YES	YES	
	SQG	VSQG	180	6000	NO LIMIT	1000	YES*	$YES_{(HCl)}$	YES	YES	
	SQG	NONE	180	6000	N/A	N/A	YES		YES	YES	
	VSQG	LQG	NO LIMIT	1000	90	NO LIMIT	YES*	$YES_{(HCl)}$	YES	YES	
	NONE	LQG	N/A	N/A	90	NO LIMIT	YES		YES	YES	
TO DEP	VSQG	SQG	NO LIMIT	1000	180	6000	YES*	$YES_{(HCl)}$	YES	YES	
	VSQG	VSQG	NO LIMIT	1000	NO LIMIT	1000	YES*	YES	YES		
	VSQG	NONE	NO LIMIT	1000	N/A	N/A	YES*	YES	YES		
	NONE	SQG	N/A	N/A	180	6000	YES		YES	YES	
	NONE	VSQG	N/A	N/A	NO LIMIT	1000	YES*	YES	YES		

* - A manifest must be used for the VSQG category unless self transported.

Definitions:	Regulatory Status	Kilogram / Month (Generation)
	LQG	1000 OR MORE
	SQG	100-1000
	VSQG	LESS THAN 100

Conversions	Kilogram	Pounds	Gallons (varies by substance)
	100	220	25-27
	1000	2200	260-270
	6000	13200	1500-1620

4.3.1 Outdoor Secondary Containment Areas

- *Materials to be contained:*
  - Railroad Ties – is there containment for storage of old and new RR ties?
  - Transformer Fluid with PCBs in 3 transformers – if there is no secondary containment of this fluid, how are leaks detected, analyzed and mitigated?
  - Large switching batteries located outside throughout the yard.
  - Hazardous waste sludge from the WWTP
- *Verifying rainwater collection and testing for contaminants:*
  - Who in the pollution prevention team is designated and trained to sample the rainwater?
  - What is the protocol for collecting and sampling rainwater?
  - Where are the rainwater samples sent for testing?
  - Who reviews the sampling data to determine proper disposal?
  - Where are the sampling records/logs located?
  - How is the contaminated rainwater pumped out?
  - Where is the contaminated rainwater stored until disposal as hazardous waste?
- *Status of Compliance of Containment Structures:*
  - Identify the existing containment facilities that have sufficient containment.

- Identify those that will be "upgraded" as stated in the SWPPP and on what schedule.

4.3.2 Product transfer via pipeline and truck

- Hazardous product storage areas and waste accumulation areas should be noted on the figure 2 site plan.
- Transfer of wastewater treatment plant sludge from storage tank to truck should be described.

4.3.3 Vehicle Parking Areas

- Is salt or any other chemical used to de-ice the parking lot? If a non-salt alternative is used, where is it stored?

4.3.4 Building and Grounds Maintenance

- Grounds
  - Pesticides – what grounds maintenance products (e.g. herbicides) are used, when are they used, who applies them, how are they applied and where are they stored?
- Roads - maintenance products such as oil or salt for the dirt roads, etc.
- Buildings – paint, etc.

4.4 Pollution Discharge History

There has been a significant history of spills at the railyard which have been under investigation through the Massachusetts Contingency Plan. Please see attachment #1 for a list of 8 recent release from 1998 – 2005. There are many more from the past not noted here, but are available upon request from the DEP database.

5.0 Inspections

B&M is required to provide an annual report that includes the proper certification to EPA and DEP documenting the previous year's inspections and maintenance activities, results recorded, records maintained, and that the facility is in compliance with the SWPPP. The report with the proper certification shall be signed and a copy of the certification must be sent each year to EPA and DEP within 30 days of the annual anniversary of the effective date of the permit. Clarify how these records will be kept, and when report will be sent to EPA and DEP.

The MSGP requirements for *Recordkeeping and Internal Reporting Procedures* for incidents such as spill, or other discharges (including information on the quality and quantity of storm water discharges) must be included in records. All inspections and maintenance activities must be documented and maintained on site for at least five years. Document your *Recordkeeping and Internal Reporting Procedures* for incidents such as spill, and other discharges.

5.1 Weekly Visual Inspections

- Who will conduct these inspections and re-inspections of corrective actions?
- Will there be records of these inspections?
- Will there be records of any corrective action forms?
- What is the time frame that corrective actions will be conducted and then re-inspected?

5.1 Annual Compliance Inspections

- Form #2 is referred to in the SWPPP as the inspection checklist to be used for the annual inspection. It is actually labeled *Outfall Inspection Checklist.* It does not have sections to collect information for:
  - Adequacy of BMPs guidance and worker implementation to reduce pollutant loadings
  - New activities that could pose a threat to stormwater quality
  - Pollutants entering the drainage system

- Spill response equipment
- Stormwater discharge for signs for sedimentation and pollutants

- Certification that stormwater discharge has been tested for the presence of non-storm water materials in the discharge:
  - What is the protocol for collecting and testing?

- What is the protocol and time frame for corrective action and re-inspection for problems identified during the annual inspections and testing of stormwater?

6.1 Good Housekeeping

Based on the SWPPP inference that good housekeeping and spill clean-up practice is dependent on employee awareness;

- List and attach copies of management protocols or standard operating procedures related to housekeeping and spill response that are provided to and used to train employees.

6.2 Preventative Maintenance (PM)

For both the 1) stormwater drainage system and the 2) storage and transfer area preventative maintenance, provide;

- PM schedule
- Record keeping system of weekly, periodic and annual compliance monitoring inspections and equipment testing
- Titles and roles of responsible staff

6.3 SPCC plan

- The SPCC Plan is the main SWPPP reference to the MSGP requirement for a description of the Spill Prevention and Response Procedures. There should be spill prevention for other activities and storage of hazardous materials besides oil products. Specifically the hazardous waste regulations and the fire prevention regulations contain requirements that should be spelled out here.
- Attach the SPCC Plan to SWPPP and at a minimum address:
  - Facility drainage
  - Bulk storage tanks
  - Facility transfer operations, pumping, and in-plant processes (onshore)
  - Facility tank car and tank truck loading/unloading rack (onshore)
  - Inspections and records
  - Security
  - Personnel training and spill prevention procedures.
- Add to the attached SWPPP **form 2:** ***Action Call List*** –Deerfield Police Department, Selectman's office, Fire Department and Highway Department

6.7 Non-Storm Water Discharges

The SWPPP refers to a visual inspection that found no evidence of un-permitted non-storm water discharges to the storm drain system.

- When was this inspection conducted and is this the only inspection ever conducted?? Were there any samples ever taken?? B&M has not provided any signed certification of this which is required under section 4.4.1.1 of the MSGP that all discharges have been tested or evaluated for the presence of non-storm water, including evaluation criteria and a list of outfalls evaluated, etc.
- According to Steve Calder of during a NPDES site visit by on May 28, 2004: An oil boom was observed near outfall #3. When EPA inquired about this, and B&M staff stated that someone

illegally dumped motor oil with gasoline. Paul Hogan of DEP had responded to this situation and an IRA was conducted. This incident is not reported in the SWPPP. Have any measures been taken to attempt to prevent this in the future?

6.8 Sediment and erosion control

The SWPPP says that town access roads are paved and maintained by the town. McClelland Farm Road is a major access road running the entire length of the backside of the railyard and it is not paved. The town minimally maintains the road in the summer only and has considered closing it altogether.

6.10 Consistency

The SWPPP notes that it is consistent with the railyard's NPDES permit. The SWPPP was not amended to include any new permit requirements. The SWPPP submitted to EPA was dated July 28, 2005, whereas the final permit was issued August 15, 2006. In fact, page 1 of the SWPPP states that the permit is "currently being finalized." *NPDES Permit Monitoring requirements are not included in the SWPPP submitted.*

7.0 Recommendations

- Since this SWPPP was not amended to include any new permit requirements, recommendations may need to be expanded to address the permit requirements.
- What is the status of implementation for these recommendations? The SWPPP submitted was dated 7/28/05. It has been 1.5 years since it was written. Please be specific to each recommendation.
- There are several recommendations regarding secondary containment noted here that were not, but should be also addressed in section 4.3.1 *Outdoor Secondary Containment.*

Miscellaneous Concerns as a follow-up to NPDES site visit by EPA Steve Calder on May 28, 2004:

- EPA personnel observed a culvert that conveys water under the road and down the embankment to the wetland. Mr Calder's notes stated that there is no permit for this culvert. Has B&M applied for and received a permit for this culvert?
- Mr Calder observed two 55-gallon drums near outfall #006. B&M personnel said that they were metal spike containers and they would be removed. Have they been removed?

Attachment #1: Releases of Hazardous Materials at B&M Railyard, East Deerfield

MA DEP *Reportable Release Lookup* on 1/23/07 on http://db.state.ma.us/dep/cleanup/sites/Results2.asp

Site Information

Site Number:	**1-0013894**	Category:	TWO HR
Site Name:	MCCLELLAN FARM ROAD	Release Type:	RAO
Address:	246 RAILROAD AVE	Current date:	10/25/2001
Town:	DEERFIELD	Phase:	
Zipcode:	01342-0000	RAO class:	A1
Official notification date:	4/18/2001	Hazard or Petrol:	Oil
Location type:	WATERBODY	Source:	UNKNOWN

Response Action Information

Response Action Type:	RAO - Response Action Outcome - RAO
Status:	FEEREC - Fee Received - FMCRA Use Only
Submittal Date:	**10/29/2001**
RAO class:	A1
Activity & Use Limitation:	

Response Action Information

Response Action Type:	IRA - Immediate Response Action
Status:	PLANWR - Written Plan Received
Submittal Date:	**7/6/2001**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	RNF
Status:	REPORT - Reportable Release under MGL 21E
Submittal Date:	**7/6/2001**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	REL - Release Disposition
Status:	REPORT - Reportable Release under MGL 21E
Submittal Date:	**4/18/2001**
RAO class:	
Activity & Use Limitation:	

Chemicals

Chemical	Amount Units
UNKNOWN CHEMICAL OF TYPE - OIL	

LSPs

LSP#	Name
2196	DROBINSKI, JOHN C

RAO Detail

Class	Method	GW Category	Soil Category
A1	N		

Site Information

Site Number:	**1-0012430**	Category:	120 DY
Site Name:	B&M RAILROAD YARD	Release Type:	REMOPS
Address:	MCCLELLAND FARM RD	Current date:	10/20/2006
Town:	EAST DEERFIELD	Phase:	PHASE V
Zipcode:	01342-0000	RAO class:	
Official notification date:	6/29/98	Hazard or Petrol:	

Location type:

Source:

Response Action Information

Response Action Type: IRA - Immediate Response Action

Status: CSRCVD - Completion Statement Received

Submittal Date: **12/7/2006**

RAO class:

Activity & Use Limitation:

Response Action Information

Response Action Type: PHASIV - Phase 4

Status: CSRCVD - Completion Statement Received

Submittal Date: **10/20/2006**

RAO class:

Activity & Use Limitation:

Response Action Information

Response Action Type: PHASEV - Phase 5

Status: REMOPS - Remedy Operation Status Submittal Received

Submittal Date: **10/20/2006**

RAO class:

Activity & Use Limitation:

Response Action Information

Response Action Type: TCLASS - Tier Classification

Status: T2EXT - Tier 2 Extension

Submittal Date: **9/22/2006**

RAO class:

Activity & Use Limitation:

Response Action Information

Response Action Type: PHSIII - Phase 3

Status: REVRCD - Revised Statement or Transmittal Received

Submittal Date: **5/2/2005**

RAO class:

Activity & Use Limitation:

Response Action Information

Response Action Type: PHASII - Phase 2

Status: REVRCD - Revised Statement or Transmittal Received

Submittal Date: **5/2/2005**

RAO class:

Activity & Use Limitation:

Response Action Information

Response Action Type: RNF

Status: REPORT - Reportable Release under MGL 21E

Submittal Date: **11/22/2002**

RAO class:

Activity & Use Limitation:

Response Action Information

Response Action Type: TCLASS - Tier Classification

Status: LNKVTC - RTN Linked to TCLASS Via Tier

Chemicals

Chemical	Amount	Units
UNKNOWN CHEMICAL OF UNKNOWN TYPE	-21400	MG/KG
UNKNOWN CHEMICAL OF UNKNOWN TYPE	1.9	UG/L

LSPs

LSP#	Name
2196	DROBINSKI, JOHN C
9244	GABRIEL, PAUL F

Related RTNs

Primary RTN	Related RTNs
1-0012501	1-0012430
	1-0013006
1-0013006	1-0012430
	1-0012501

Secondary RTNs

1-0012501

1-0013006

Tier Classification Detail

NRS Totals	II	III	IV	V	VI	Zone 2	Imminent Hazard	Permit/TierII Expiration Date
152	35	87	10	20	0	N	N	1/18/2006
296	145	136	10	45	-40	N	N	9/22/2007

Classification Submittal

Submittal Date: **11/22/2002**

RAO class:

Activity & Use Limitation:

Response Action Information

Response Action Type: RNF

Status: REPORT - Reportable Release under MGL 21E

Submittal Date: **6/29/98**

RAO class:

Activity & Use Limitation:

Site Information

Site Number: **1-0013006**

Site Name: B&M E DEERFIELD RAILYARD

Address: MCCLELLAND FARM RD

Town: DEERFIELD

Zipcode: 01342-0000

Official notification date: 7/2/99

Location type: COMMERCIAL

Category: 72 HR

Release Type: RAONR

Current date: 11/22/2002

Phase:

RAO class:

Hazard or Petrol: Oil

Source: HISTORICAL

Response Action Information

Response Action Type: RAONR - RAO Not Required

Status: RTCLSS - Linked to a Tier Classified Site

Submittal Date: **11/22/2002**

RAO class:

Activity & Use Limitation:

Response Action Information

Response Action Type: RAONR - RAO Not Required

Status: RTCLSS - Linked to a Tier Classified Site

Submittal Date: **1/18/2001**

RAO class:

Activity & Use Limitation:

Response Action Information

Response Action Type: IRA - Immediate Response Action

Status: CSRCVD - Completion Statement Received

Submittal Date: **12/7/2006**

RAO class:

Activity & Use Limitation:

Response Action Information

Response Action Type: TCLASS - Tier Classification

Status: REVRCD - Revised Statement or Transmittal Received

Submittal Date: **11/22/2002**

RAO class:

Activity & Use Limitation:

Response Action Information

Chemicals

Chemical	Amount	Units
DIESEL FUEL	39	INCH

LSPs

LSP#	Name
2196	DROBINSKI, JOHN C
9244	GABRIEL, PAUL F

Related RTNs

Primary RTN	Related RTNs
1-0012430	1-0012501
	1-0013006
1-0012501	1-0012430
	1-0013006

Secondary RTNs

1-0012430

1-0012501

Tier Classification Detail

NRS Totals	II	III	IV	V	VI	Zone 2	Imminent Hazard	Permit/TierII Expiration Date
152	35	87	10	20	0	N	N	1/18/2006
296	145	136	10	45	-40	N	N	9/22/2007

Response Action Type:	TCLASS - Tier Classification
Status:	LNKVTC - RTN Linked to TCLASS Via Tier Classification Submittal
Submittal Date:	**11/22/2002**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	RNF
Status:	REPORT - Reportable Release under MGL 21E
Submittal Date:	**11/17/99**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	REL - Release Disposition
Status:	REPORT - Reportable Release under MGL 21E
Submittal Date:	**7/2/99**
RAO class:	
Activity & Use Limitation:	

Site Information

Site Number:	**1-0012219**	Category:	TWO HR
Site Name:	B&M RAILROAD YARD	Release Type:	RAO
Address:	RAILROAD AVE	Current date:	6/26/98
Town:	DEERFIELD	Phase:	
Zipcode:	01342-0000	RAO class:	A1
Official notification date:	2/27/98	Hazard or Petrol:	Oil
Location type:	INDUSTRIAL, OPENSPACE, RR YARD	Source:	PIPE

Response Action Information

Response Action Type:	RAO - Response Action Outcome - RAO
Status:	RAORCD - RAO Statement Received
Submittal Date:	**6/26/98**
RAO class:	A1
Activity & Use Limitation:	NONE

Chemicals

Chemical	Amount	Units
LUBRICATING OIL	1000	GAL

LSPs

LSP#	Name
2196	DROBINSKI, JOHN C

RAO Detail

Class	Method	GW Category	Soil Category
A1	N		

Response Action Information

Response Action Type:	IRA - Immediate Response Action
Status:	PLANWR - Written Plan Received
Submittal Date:	**5/5/98**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	RNF
Status:	REPORT - Reportable Release under MGL 21E
Submittal Date:	**5/1/98**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	REL - Release Disposition

Status: REPORT - Reportable Release under MGL 21E
Submittal Date: **2/27/98**
RAO class:
Activity & Use Limitation:

Site Information

Site Number:	**1-0012998**	Category:	TWO HR
Site Name:	RAILYARD	Release Type:	RAO
Address:	RAILROAD AVE	Current date:	10/26/99
Town:	EAST DEERFIELD	Phase:	
Zipcode:	01342-0000	RAO class:	A2
Official notification date:	6/26/99	Hazard or Petrol:	Oil
Location type:	COMMERCIAL	Source:	RAILCAR

Response Action Information
Response Action Type: RAO - Response Action Outcome - RAO
Status: RAORCD - RAO Statement Received
Submittal Date: **10/26/99**
RAO class: A2
Activity & Use Limitation:

Chemicals

Chemical	Amount	Units
DIESEL FUEL	800	GAL

LSPs

LSP#	Name
2196	DROBINSKI, JOHN C

Response Action Information
Response Action Type: IRA - Immediate Response Action
Status: PLANWR - Written Plan Received
Submittal Date: **8/30/99**
RAO class:
Activity & Use Limitation:

RAO Detail

Class	Method	GW Category	Soil Category
A2	1	3	2

Response Action Information
Response Action Type: RNF
Status: REPORT - Reportable Release under MGL 21E
Submittal Date: **7/21/99**
RAO class:
Activity & Use Limitation:

Response Action Information
Response Action Type: REL - Release Disposition
Status: REPORT - Reportable Release under MGL 21E
Submittal Date: **6/26/99**
RAO class:
Activity & Use Limitation:

Site Information

Site Number:	**1-0012501**	Category:	72 HR
Site Name:	EAST DEERFIELD RAILYARD	Release Type:	RAONR
Address:	246 RAILROAD AVE	Current date:	11/22/2002
Town:	DEERFIELD	Phase:	PHASE IV
Zipcode:	01342-0000	RAO class:	
Official notification date:	8/5/98	Hazard or Petrol:	Oil
Location type:	COMMERCIAL	Source:	UST

Response Action Information

Response Action Type:	RAONR - RAO Not Required
Status:	RTCLSS - Linked to a Tier Classified Site
Submittal Date:	**11/22/2002**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	RAO - Response Action Outcome - RAO
Status:	STMRET - Submittal Retracted
Submittal Date:	**1/18/2001**
RAO class:	A2
Activity & Use Limitation:	

Response Action Information

Response Action Type:	PHSIII - Phase 3
Status:	CSRCVD - Completion Statement Received
Submittal Date:	**2/21/2003**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	PHASII - Phase 2
Status:	CSRCVD - Completion Statement Received
Submittal Date:	**11/22/2002**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	TCLASS - Tier Classification
Status:	LNKVTC - RTN Linked to TCLASS Via Tier Classification Submittal
Submittal Date:	**11/22/2002**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	IRA - Immediate Response Action
Status:	CSRCVD - Completion Statement Received
Submittal Date:	**9/27/2001**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	PHASEI - Phase 1
Status:	CSRCVD - Completion Statement Received
Submittal Date:	**1/18/2001**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	RNF
Status:	REPORT - Reportable Release under MGL 21E
Submittal Date:	**10/6/98**
RAO class:	
Activity & Use Limitation:	

Chemicals

Chemical	Amount	Units
DIESEL FUEL	100	PPM

LSPs

LSP#	Name
2196	DROBINSKI, JOHN C

Related RTNs

Primary RTN	Related RTNs
1-0012430	1-0012501
	1-0013006
1-0013006	1-0012430
	1-0012501

Secondary RTNs

1-0012430

1-0013006

RAO Detail

Class	Method	GW Category	Soil Category
A2	3	3	3

Tier Classification Detail

NRS Totals	II	III	IV	V	VI	Zone 2	Imminent Hazard	Permit/TierII Expiration Date
152	35	87	10	20	0	N	N	1/18/2006

Response Action Information

Response Action Type:	REL - Release Disposition
Status:	REPORT - Reportable Release under MGL 21E
Submittal Date:	**8/5/98**
RAO class:	
Activity & Use Limitation:	

Site Information

Site Number:	**1-0015822**	Category:	TWO HR
Site Name:	B & M RAILROAD	Release Type:	RAO
Address:	RIVER RD	Current date:	11/22/2005
Town:	EAST DEERFIELD	Phase:	
Zipcode:	01342-0000	RAO class:	A1
Official notification date:	7/13/2005	Hazard or Petrol:	Hazardous Material
Location type:		Source:	TANKER

Response Action Information

Response Action Type:	RAO - Response Action Outcome - RAO
Status:	RAORCD - RAO Statement Received
Submittal Date:	**11/22/2005**
RAO class:	A1
Activity & Use Limitation:	

Chemicals

Chemical	Amount	Units
PHENOL		

LSPs

LSP#	Name
4280	KUBICZKI, JOHN

RAO Detail

Class	Method	GW Category	Soil Category
A1	1	1	1

Response Action Information

Response Action Type:	RNF
Status:	REPORT - Reportable Release under MGL 21E
Submittal Date:	**9/12/2005**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	IRA - Immediate Response Action
Status:	PLANWR - Written Plan Received
Submittal Date:	**9/12/2005**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	REL - Release Disposition
Status:	REPORT - Reportable Release under MGL 21E
Submittal Date:	**7/13/2005**
RAO class:	
Activity & Use Limitation:	

Site Information

Site Number:	**1-0015823**	Category:	TWO HR
Site Name:	B & M RAILROAD	Release Type:	TIERII
Address:	RIVER RD	Current date:	8/10/2006
Town:	EAST DEERFIELD	Phase:	PHASE II
Zipcode:	01342-0000	RAO class:	
Official notification date:	7/13/2005	Hazard or Petrol:	Oil
Location type:		Source:	TANKER

Response Action Information

Response Action Type:	IRA - Immediate Response Action
Status:	STRCVD - Status or Interim Report Received
Submittal Date:	**11/30/2006**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	TCLASS - Tier Classification
Status:	TIERII - Tier 2 Classification
Submittal Date:	**8/10/2006**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	PHASEI - Phase 1
Status:	CSRCVD - Completion Statement Received
Submittal Date:	**8/10/2006**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	PHASII - Phase 2
Status:	SOW - Scope of Work Received
Submittal Date:	**8/10/2006**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	RNF
Status:	REPORT - Reportable Release under MGL 21E
Submittal Date:	**9/12/2005**
RAO class:	
Activity & Use Limitation:	

Response Action Information

Response Action Type:	REL - Release Disposition
Status:	REPORT - Reportable Release under MGL 21E
Submittal Date:	**7/13/2005**
RAO class:	
Activity & Use Limitation:	

Chemicals

Chemical	Amount	Units
DIESEL FUEL	750	GAL

LSPs

LSP#	Name
4280	KUBICZKI, JOHN

Tier Classification Detail

NRS Totals	II	III	IV	V	VI	Zone 2	Imminent Hazard	Permit/TierII Expiration Date
176	35	96	20	25	0	N	N	8/10/2011

Attachment # 2
Underground Utilities at the East Deerfield Railyard
Submitted by B&M as part of their MCP report requirements