



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

DATE: August 26, 2004

SUBJ: Site Investigation Closure Memorandum
Apco Mossberg Company, Inc. Site
100-101 Lamb Street
Attleboro, Massachusetts 02703

FROM: Melanie I. Pincus, On-Scene Coordinator *Melanie I. Pincus*
Emergency Response and Removal Section II, EPRB, OSRR

THRU: Steven Novick, Chief *[Signature]*
Emergency Response and Removal Section II, EPRB, OSRR

TO: Apco Mossberg Company, Inc. Site File

In accordance with section 300.410 of the National Contingency Plan (NCP), a Removal Site Evaluation, consisting of a Preliminary Assessment and Site Investigation (PA/SI), has been undertaken at the Apco Mossberg Company, Inc. Site ("Site") in Attleboro, Massachusetts. The findings of the Removal Site Evaluation have been evaluated under the criteria set forth in section 300.415 of the NCP, section 104(a) and (b) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(a) and (b) and Clean Water Act (CWA) § 311(c)(i) as amended by the Oil Pollution Act (OPA) § 4201(a). The Removal Site Evaluation has led to the determination that a Removal Action is appropriate at this time.

The findings of the Removal Site Evaluation are outlined below.

1. Source and nature of the release or threat of release
 - a. The Removal Site Evaluation consisted of the following actions:
 - i. Review of XRF field screening analytical results generated by EPA during the Site Investigation on August 23, 24 and 25, 2004.
 - ii. Review of analytical results generated by EPA entitled
Apco Mossberg, Attleboro, MA - XRF Field Screening Results dated April 11, 2004;
Apco Mossberg - Metals in Soil Medium Level by ICP dated April 28, 2004; and
Apco Mossberg - PCBs Medium Level in Soils and Sediments dated April 20, 2004
Refer to report generated by EPA's contractor, Weston Solutions, Inc., Superfund Technical Assessment and Response Team (START) entitled *Removal Program Preliminary Assessment/Site Investigation Report for the Apco Mossberg Company, Inc. Site* dated September 2004.
 - iii. Review of a report generated by START entitled *Draft Preliminary Assessment/Site Inspection Report for Apco Mossberg Company, Inc.* dated

October 20, 2003.

- iv. Review of a memorandum generated by START entitled *Sample Summary Memorandum* for Apco Mossberg Company, Inc. dated July 11, 2003.
 - v. Review of a report generated by START entitled *Trip Report for Apco Mossberg Company, Inc.* dated June 10, 2003.
 - vi. Review of a site profile memorandum generated by the Massachusetts Department of Environmental Protection (MADEP) entitled *Potential Hazardous Waste Site - Site Identification* dated March 26, 2004.
 - vii. The Site Investigations on March 29 and 30, 2004, and August 23, 24 and 25, 2004.
 - viii. Generation of a PA/SI report by START entitled *Removal Program Preliminary Assessment/Site Investigation Report for the Apco Mossberg Company, Inc. Site* dated September 2004.
- b. Based on the information available at this time, the principal hazardous substances or pollutants that are being released or for which there is threat of release include but are not necessarily limited to the list below.

<u>Hazardous Substances or Pollutants or Contaminants</u>	<u>Media</u>
ignitable chemicals	containers
metals (barium, cadmium, lead)	soil
polychlorinated biphenyls (PCBs)	capacitors and soil

2. Evaluation of the threat to public health, welfare and the environment

a. Federal Agency for Toxic Substances and Disease Registry:

Threat _____ No Threat _____ Evaluation Not Necessary X

b. Endangerment to the ecosystem:

Threat _____ No Threat _____ Evaluation Not Necessary X

3. The Removal Site Evaluation was terminated pursuant to section 300.410(f) of the NCP for the following reason(s).

- () There is no release.
- () The source is neither a "vessel" nor a "facility" as defined in section 300.5 of the NCP.

- ☐ The release involves neither a hazardous substance, nor a pollutant or contaminant that may present an imminent and substantial danger to public health or welfare of the United States.
 - ☐ It is subject to the limitations on response specified in §300.400(b)(1) through (3). The release is
 - ☐ of a naturally occurring substance in its unaltered form, or altered solely through naturally occurring processes or phenomena, from a location where it is naturally found.
 - ☐ from products that are part of the structure of, and result in exposure within, residential buildings or businesses or community structures.
 - ☐ into public or private drinking water supplies due to deterioration of the system through ordinary use.
 - ☐ The amount, quantity, or concentration released does not warrant a Federal response.
 - ☐ A party responsible for the release, or any other person, is providing appropriate response, and on-scene monitoring by EPA is not required.
 - ☒ The Removal Site Evaluation is complete.
4. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its completion, and not for other reasons.
- a. The factors listed below, found in Section 300.415(b)(2) of the NCP, are applicable to this Site.
- ☒ Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.
 - ☒ Actual or potential contamination of drinking water supplies or sensitive ecosystems.
 - ☒ Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.
 - ☒ High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.
 - ☐ Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
 - ☐ Threat of fire or explosion.
 - ☒ The availability of other appropriate Federal or State response mechanisms to respond to the release.
 - ☐ Other situations or factors that may pose threats to public health or welfare of the United States or the environment.

- b. The existence of the conditions specified in Section 4.a., above, indicate that a Removal Action under section 300.415 of the NCP is necessary.

Site hazards include soil and debris piles contaminated with metals (including, but not limited to, barium, cadmium and lead), soils and capacitors contaminated with polychlorinated biphenyls (PCBs), and miscellaneous containers of potentially ignitable chemicals (including, but not limited to, paints, aerosols, and compressed gas cylinders). Contaminated media is exposed to the environment and may serve as a source of contamination to individuals who access the Site. Access to the site is unrestricted to both pedestrian and vehicular traffic. Several tents and living areas for transient populations have been observed along the northern and western edges of the Site, and individuals have been observed residing on and around the Site. Evidence of children accessing the Site include used firecrackers, soccer balls and toys. Residences border the site to the southeast and northeast.

- c. In light of the magnitude of the threat or potential threat to health, welfare, or the environment, the appropriate categorization of a Removal Action at this Site is:

Emergency____ Time-Critical X Non Time-Critical____

5. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its completion, and not for other reasons.

- a. As found in section 300.410(e)(1) of the NCP, the OSC shall determine whether a release governed by CWA section 311(c)(1), as amended by OPA section 4201(a), has occurred.

() There is a release, or potential threat of release, as governed by the CWA as amended by OPA.

(X) There is not a release, or potential threat of release, as governed by the CWA as amended by OPA.

- b. The absence of the conditions specified in Section 5.a., above, indicate that an Oil Spill Response under Appendix E to Part 300 of the NCP is **not** necessary.

A discharge of oil into or upon the navigable waters of the United States and adjoining shorelines, the waters of the contiguous zone, or waters of the exclusive economic zone, or which may affect the natural resources belonging to, appertaining to, or under the exclusive management authority of the United States **has not** occurred at this time.

cc: Steven Novick, Chief, Emergency Response and Removal Section II
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Encl: Analytical Results