



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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Boston, MA 02109-3912

DATE: January 23, 2018

SUBJ: Site Investigation Closure Memorandum
Summer Street (#250) Site
250 Summer Street
Lancaster, NH 03584

FROM: Wing Chau, On-Scene Coordinator *WC*
Emergency Response and Removal Section II, EPRB, OSRR

THRU: William P. Lovely, Chief *WPL*
Emergency Response and Removal Section II, EPRB, OSRR

TO: Summer Street (#250) 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 Summer Street (#250) Site ("Site") in Lancaster, NH. 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 NHDES's Site Investigation Summary Report for the Former Dan's Service Center (250 Summer Street) Site, dated October 28, 2016.
 - ii. Interviews with NHDES personnel.
 - iii. The Preliminary Assessment/Site Investigation on August 24, 2017.

iv. Generating a PA/SI report by EPA's Superfund Technical Assessment and Response Team (START) contractor, titled "Removal Program Preliminary Assessment/Site Investigation Report for the Summer Street (#250) Site, Lancaster, Coos County, New Hampshire, 24 August 2017."

b. Based on the information available at this time, the principal hazardous substances or pollutants or contaminants 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>
Benzene	Liquids (Fuel Mixtures)
Toluene	Liquids (Fuel Mixtures)
Ethylbenzene	Liquids (Fuel Mixtures)
M/P Xylene	Liquids (Fuel Mixtures)
Ortho Xylene	Liquids (Fuel Mixtures)
Methyl tert-butyl ether	Liquids (Fuel Mixtures)
Naphthalene	Liquids (Fuel Mixtures)
Di-n-butylphthalate	Liquids (Fuel Mixtures)
Cadium	Waste Oils
Lead	Waste Oils
Flammables/Ignitables	Fuel Mixtures

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.

- (X) 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.
 - (X) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
 - (X) Threat of fire or explosion.
 - (X) 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 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.

EPA's PA/SI has confirmed the analytical data collected during NHDES' Site Investigation in October 28, 2016; and further documented the presence of CERCLA hazardous substances being stored in 55-gallon drums and 275-gallon totes in an unsecured trailer box. In addition, analytical results indicate the presence of ignitable/flammable materials being stored 55-gallon drums in this unsecured trailer box, which poses a threat of fire or explosion. During the PA/SI, there was evidence of a homeless individual living in an automobile parked adjacent to this storage trailer.

- 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.
- cc: William P. Lovely, Chief, Emergency Response and Removal Section II, OSRR
Meghan Cassidy, Chief, Technical Support & Site Assessment Section, OSRR
Patti Ludwig, Information & Budget Management Section, OSRR
David Degler, New Hampshire Department of Environmental Services

Encl: PA/SI Report