



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

DATE: October 16, 2018

SUBJ: Site Investigation Closure Memorandum
Microfab Inc. (Former) Superfund Site
104-106 Haverhill Road
Amesbury, Massachusetts 01913

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

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

TO: Microfab Inc. (Former) Superfund 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 Microfab Inc. (Former) Superfund Site (Site) in Amesbury, MA. 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 the *Microfab Inc. Amesbury, MA Hazardous Material Survey Report*, dated December 2016, prepared by Amec Foster Wheeler Environment & Infrastructure, Inc. for the Massachusetts Department of Environmental Protection (MassDEP).
 - ii. Interview with MassDEP personnel.

- iii. The Preliminary Assessment/Site Investigation on August 31, 2018.
 - 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 Microfab Inc. (Former) Superfund Site, Amesbury, Essex County, Massachusetts, October 2018.*"
- 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>
Hydrochloric Acid	Liquids
Acids	Liquids
Ammonium Hydroxide	Solids
Lead	Solids
Mercury	Solids

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.
- (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, which was performed on August 31, 2018, has confirmed the site conditions and analytical data identified in MassDEP's Hazardous Materials Survey report for the Microfab Inc. (Former) Site; and reaffirmed the presence of CERCLA hazardous substances being stored in chemical storage tanks and plating vats in the unsecured Microfab building. During the PA/SI, significant evidence of trespassing, including graffiti and beverage containers, were observed throughout the building. The corrosive materials and acids remaining at the unsecured building poses a direct contact threat.

On October 16, 2018, a site review meeting was held to discuss the PA/SI findings. Attendees of the meeting include: Carol Tucker, Chief of the Emergency Planning and Response Branch (EPRB); William Lovely, Chief of the Emergency Response and Removal Section II; Wing Chau, OSC; Lisa Thuot, Remedial Project Manager; Stacy Greendlinger, Enforcement Coordinator; and Kelsey Dumville, Community Involvement Coordinator. The Case Team recommended that a time-critical action be undertaken at this Site to address the contact threat posed by the CERCLA hazardous substances at this Site. The EPRB management team supported the Case Team's recommendation and approved moving forward in drafting an action memorandum to request a time-critical removal action for the Site.

- 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
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Valerie Thompson, Massachusetts Department of Environmental Protection

Encl: PA/SI Report