



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

DATE: June 15, 2020

SUBJ: Site Investigation Closure Memorandum
Ried Cleaners Site
218 Main Street
Great Barrington, MA 01230

FROM: Michael Cofsky, On-Scene Coordinator
Emergency Response and Removal Section II, EPRB, SEMD

THRU: Daniel Burgo, Acting Chief
Emergency Response and Removal Section II, EPRB, SEMD

TO: Ried Cleaners Site File

In accordance with the National Contingency Plan (NCP) § 300.410, a Removal Site Evaluation, consisting of a Preliminary Assessment and Site Investigation (PA/SI), has been undertaken at the Ried Cleaners Site ("Site") in Great Barrington, MA. The findings of the Removal Site Evaluation have been evaluated under the criteria set forth in the NCP § 300.415, the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) § 104(a) and (b), 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 analytical results generated by contractors for the property owner including the "Immediate Response Action (IRA) Status Reports" generated by EcoGenesis, "Phase I Initial Site Investigation" generated by EgoGenesis, and "Interim Phase II Comprehensive Site Assessment Report" generated by TRC.

- ii. Review of other documents including “Indoor Air Quality Investigation Summary and Request for Action - United States Postal Service” generated by AECOM.
 - iii. Interviews with the property owner, neighbors, and the Town Officials.
 - iv. The Site Investigation on December 9-11, 2019.
 - v. Generating a PA/SI report by EPA’s contractor, titled "Removal Program Preliminary Assessment/Site Investigation Report for the Ried Cleaners Site” dated January 2020.
 - vi. The Site Review Meeting on March 26, 2020 and subsequent conversations, where site investigation results were shared with the Site Case Team and Emergency Planning & Response Branch (EPRB) management, and the decision to conduct a Removal Action was supported.
- 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.

Hazardous Substances or
Pollutants or Contaminants

Media

Chlorinated Solvents (PCE, TCE) soil, ground water

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 the NCP § 300.410(f) for the following reason(s).

- There is no release.
- The source is neither a "vessel" nor a "facility" as defined in the NCP § 300.5.
- 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 the NCP § 300.415(b)(2), 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.
 - (X) 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.
 - () 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 the NCP § 300.415 is necessary.

Current site conditions warrant a Federal Response by the Emergency Planning and Response Branch (EPRB) of EPA Region 1. The data from the Preliminary Assessment/Site Investigation (PA/SI) revealed exceedances of chlorinated solvents above the EPA Removal Program Removal Management Levels (RMLs) in soil samples. Based on these results, the quantity and concentration of contamination warrants a Time Critical Removal Action. In addition, the neighboring U.S. Post Office is currently being affected by chlorinated vapor intrusion from source material associated with the Ried Cleaners site.

After reviewing the results of the site investigation, a Site Review Meeting was held on March 26, 2020. At this meeting the findings from the site investigation were presented, a decision to move forward with further investigation and a Removal Action was proposed, and that decision was supported by the Site Case Team and EPRB management. During subsequent conversations, after more data was made available, the decision to move forward with a Removal Action was supported.

For further information regarding the PA/SI, refer to the “Removal Program Preliminary Assessment/Site Investigation Report for the Ried Cleaners Site” dated January 2020.

- 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 the NCP § 300.410(e)(1), the OSC shall determine whether a release governed by CWA § 311(c)(1), as amended by OPA § 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: Daniel Burgo, Acting Chief, Emergency Response and Removal Section II, SEMD (w/o attachments)
Meghan Cassidy, Chief, Remedial Policy, Contracts & Site Assessment Section, SEMD (w/o attachments)
Patti Ludwig, Superfund Federal Facilities & Information Management Section, SEMD (w/o attachments)
Caprice Shaw, Environmental Analyst, Mass DEP
Christopher Rembold, Assistant Town Manager, Great Barrington, MA

Encl: PA/SI Report