



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

5 Post Office Square, Suite 100  
Boston, MA 02109-3912

**DATE:** August 24, 2022

**SUBJ:** Site Investigation Closure Memorandum  
Mansell Field Site  
Salem, Essex County  
Massachusetts, 01970

**FROM:** Athanasios Hatzopoulos, On-Scene Coordinator  
Emergency Response and Removal Section I

**THRU:** Edward J. Bzenas, Chief  
Emergency Response and Removal Section I

**TO:** Mansell Field Site File

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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 Mansell Field Site ("Site") in Salem, 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 the Removal Action Request provided on 6/6/22 by the Massachusetts Department of Environmental Protection (MassDEP).
    - ii. Review of Tighe & Bond 6/9/22 Summary of Site Assessment and Remedial Plan of the Mansell Field at Gallows Hill Park.
    - iii. Review of the analytical report of the Sampling Activities at Mansell Field Site, Salem, Essex County, Massachusetts. AD Number (No.) TOFP-01-22-06-0001; Task No. 0143; Document Control No. (DCN) R-50459. The EPA Superfund Technical Assessment and Response Team, Weston Solutions, Inc., conducted the sampling activities on July 5, 2022, and documented the

findings in a Memorandum dated September 2022.

- 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**

Metals (arsenic, lead, chromium)

soil

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

- a. ☒ Federal Agency for Toxic Substances and Disease Registry

☐ Other: \_\_\_\_\_

☒ Threat      ☐ No Threat      ☐ Evaluation Not Necessary

- b. Endangerment to the ecosystem:

☐ Threat      ☐ No Threat      ☒ Evaluation Not Necessary

3. If it has been determined that a removal action is **not** warranted under CERCLA, please proceed to 3a, and mark the appropriate boxes.

If it has been determined that a removal action **is** warranted under CERCLA, please proceed to 3b, and mark the box.

- a. ☐ 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.

☐ The release is from products that are part of the structure of, and result in exposure within, residential buildings or businesses or community structures.

☐ The release 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.

b. ☒ The Removal Site Evaluation is complete and a removal action is warranted.

4. As reflected in Section 3 above, the Removal Site Evaluation was completed and a removal action is warranted. Regardless of the determination, one or more of the factors listed below, found in Section 300.415(b)(2) of the NCP, may be applicable to this Site.

a. ☒ 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 purpose of this memorandum is to document the determination that a removal

action **is** warranted under section 300.415 of the NCP. On July 5, 2022, EPA conducted a Preliminary Assessment/Site Investigation (PA/SI) to confirm the previous data and reports submitted by the city's LSP. Soil samples were collected and analyzed for metals. The PA/SI confirmed that arsenic, lead and chromium were detected at levels comparable to the previous data presented by the LSP. The highest concentrations of metals are listed below and are compared to EPA's Removal Management Levels (RMLs)<sup>1</sup> and MassDEP's Standards for Soil Remediation.

Hazardous Substance	EPA PA/SI Highest Sample Concentration	EPA RML <sup>1</sup>	City (LSP) Highest Sample Concentration	MassDEP Standards for S1-Soil Remediation
Arsenic	19,000 mg/kg	68 mg/kg	12,300 mg/kg	20 mg/kg
Lead	1,100 mg/kg	Not Listed	354 mg/kg	200 mg/kg
Chromium	4,200 mg/kg	400 mg/kg	1,820 mg/kg	100 mg/kg

As documented in this Action Memorandum, metals have been detected in the Site soils and pose a threat to local residents and those who may enter the Site. The Site is a public park located in a densely populated residential neighborhood with an approximate population of 25,500 within a one-mile radius. The Site is not secured with a polyethylene cover; therefore the hazardous substances can migrate through inclement weather. The Site is a part of a larger park that attracts many small children and young adults. While everyone recreating at the Site can be potentially exposed to airborne contamination (dust/dirt particles), smaller children are also at a higher risk for ingestion of metal contaminated soil via actual eating of soil and from putting dirty hands, toys or other objects in their mouths.

- c. If a removal action **is** warranted and in light of the magnitude of the threat or potential threat to health, welfare, or the environment, the appropriate categorization of a Removal Action as this Site is:

☐Emergency ☒Time-Critical ☐Non Time-Critical ☐N/A

5. As reflected in Section 3 above, the Removal Site Evaluation has been concluded and it has been determined that a removal action under CERCLA **[is/is not]** warranted. Section 5 below documents whether a release or potential threat of release under CWA, as amended by OPA, has been determined.

<sup>1</sup> U.S. Environmental Protection Agency. <https://www.epa.gov/risk/regional-removal-management-levels-chemicals-rmls>. November 2018

- 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 release, or potential threat of release, as governed by the CWA as amended by OPA.

☐ 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 5a, above, indicate that an Oil Spill Response under Appendix E to Part 300 of the NCP **is not** necessary.

c.

cc: William Lovely, Chief,  
Emergency Response and Removal Section II, SEMD (w/o attachments)  
Ross Gilleland, Chief, Remedial Policy, Contracts, and Site Assessment Section, SEMD (w/o attachments)  
Natividad Figueroa, EPRB, SEMD (w/o attachments)  
Jonathan Onufryk, EPRB, SEMD (w/o attachments)  
Erik Johnson, MassDEP  
Tom Devine, City of Salem

Encl: PA/SI Report