UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE – SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

MEMORANDUM

DATE: June 26, 2024

SUBJ: Request for a Removal Action at the Associated Electric Site Hillsborough, Hillsborough County, NH- **Action Memorandum**

FROM: Ila White, On-Scene Coordinator
Emergency Response and Removal Section I

ILA WHITE Digitally signed by ILA WHITE Date: 2024.06.26 17:00:37 -04'00'

THRU: William Lovely, Section Manager
Emergency Planning and Response Section 2

WILLIAM LOVELY Digitally signed by WILLIAM LOVELY Date: 2024.06.27 10:30:22 -04'00'

Edward J. Bazenas, Acting Branch Manager
Emergency Response and Removal Branch

Bazenas, Ted Digitally signed by Bazenas, Ted Date: 2024.06.28 13:50:52 -04'00'

TO: Bryan Olson, Director
Superfund and Emergency Management Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed removal action at the Associated Electric Site (the Site), which is located at 171 Main Street in Hillsborough, Hillsborough County, New Hampshire (NH). Hazardous substances present in drums and containers at the Site, if not addressed by implementing the response actions selected in this Action Memorandum, will continue to pose a threat to human health and the environment. There are no nationally significant or precedent-setting issues associated with this Site, and there has been no use of the On-Scene Coordinator's (OSC's) $200,000 warrant authority.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID# : NHN000153866

SITE ID# : 01TF
CATEGORY : Time-Critical

A. Site Description

1. Removal site evaluation

From 1920 to the 1980s, the Site housed a laundering facility which added dry cleaning operations in the 1970s. In the early 1980s, Hillsboro Laundry and Cleaners closed. In 1983, Associated Electric Company leased a portion of the property. In 1996, Rosewald Industries, LLC, purchased the property from Edmund Hemas (former President of Hillsboro Laundry and Cleaners) and Associated Electric, a previous tenant of Hillsboro Laundry, continued its tenancy and operations until 2002. Associated Electric repaired industrial electric and mechanical equipment, machine parts, rewinding turbines, generators, and motors. Although the company was not listed as a hazardous waste generator, it did have small quantities of waste oil. This waste oil was containerized and deposited at the Hillsborough Transfer Station to be recycled. Small quantities of non-polychlorinated biphenyl (PCB) mineral oils were stored in drums on site. There was one self-contained degreaser at the facility maintained by Safety Kleen that used naphtha as a cleaning agent.

In 1996, while an underground storage tank of heating oil was being decommissioned, soil and groundwater samples were taken. These samples showed elevated levels of tetrachloroethylene (PCE) and trichloroethylene (TCE). While removing the underground storage tank, solvent odor and a sheen were observed. This led to site investigations. Sampling wells for monitoring (through a 2013 issued groundwater permit) were installed and impacted soils were removed from the area and then placed back after a poly liner was added.

Between 2000 and 2018, several sampling efforts were made on the Site to investigate possible contamination in the groundwater, indoor air, soil, and soil gas.

In 2020, Sanborn, Head & Associates, on behalf of the Central New Hampshire Regional Planning Commission, conducted a site reconnaissance and found labeled and unlabeled drums and containers, aboveground storage tanks, possible locations of additional underground storage tanks, and transformers potentially containing PCBs.

On June 2, 2022, the Site property was conveyed to the town of Hillsborough, due to tax foreclosure.

In May through September of 2023, a Limited Phase II Environmental Site Assessment was conducted to investigate groundwater, surface water, stormwater, sub-slab vapor, and indoor air, as well as a ground penetrating radar survey. The Phase II Environmental Site Assessment suggested the removal of drums and demolition of Building 1 was needed to address soil contamination.

On October 16, 2023, NHDES requested EPA remove drums and containers believed left on-site by the previous owner and operator and filled with unknown substances.

On February 6, 2024, EPA, its contractor, and NHDES personnel conducted a site walk of the three buildings and the main area of the property. The buildings are in various states of disrepair, the structure is deteriorating and there are cracks in the foundation. The roofs and windows are unmaintained, showing signs of significant wear. There are approximately 40-50 drums and 15-20 various other containers stored throughout the buildings, some unmarked and uncovered.

Between February 27-29, 2024, EPA mobilized to the Site to conduct representative sampling of the drums and containers and soil gas sampling. Fifteen soil gas samples, one duplicate soil gas sample, and one ambient air samples were taken on the Site in Building 1. Samples were submitted to EPA's New England Regional Laboratory for analysis for voltile organic compounds (VOCs) and semi-voltile organic compounds (SVOCs). Ten drums and containers were sampled, along with one duplicate, across three buildings. These samples were also submitted to EPA's laboratory for analysis for VOC, SVOC, PCBs, and metals.

Soil gas and indoor air samples results indicate the presence of 20 VOCs. Three of these VOCs (1,3-Butadiene, PCE, and TCE) were detected above the EPA Commercial Target Sub-Slab Soil Gas Concentration Vapor Intrusion Screening Levels. PCE was detected in all but one sample. The results for the drum samples showed the presence of 23 VOCs, four SVOCs, and four metals. See Table 1 for the specific contaminates found and their designation under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the Superfund program.

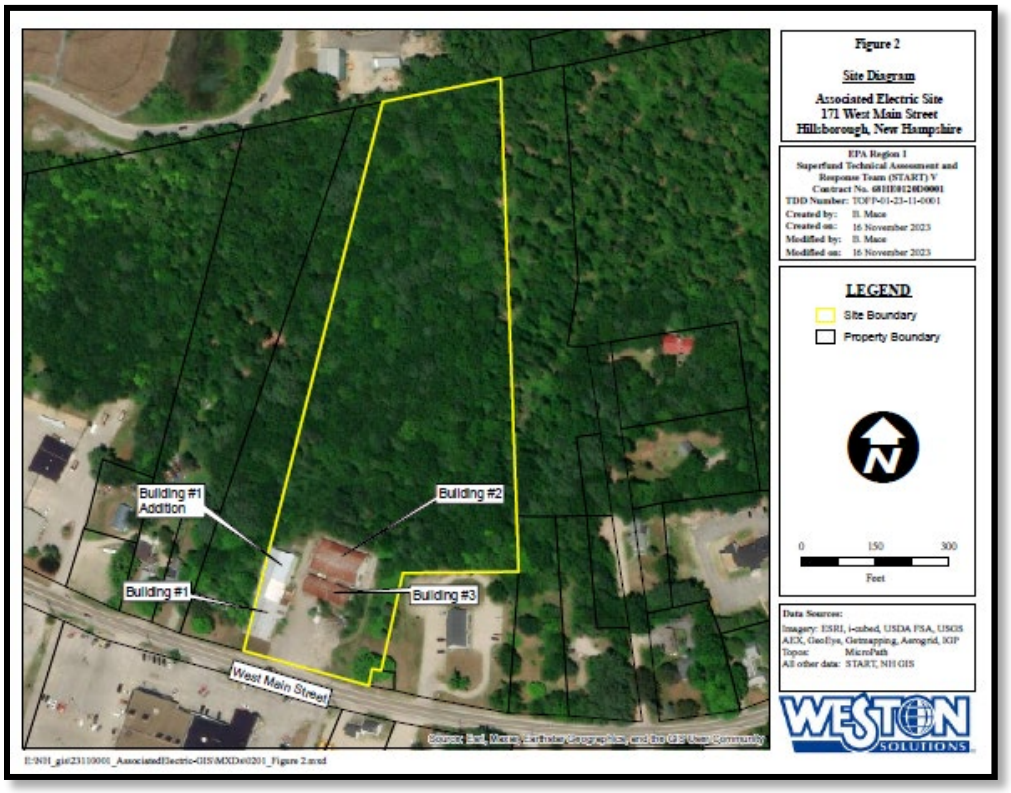
Based on the sampling results, a time-critical removal action was recommended in the Site Investigation Closure Memorandum dated June 10, 2024.

2. Physical location

The Site is located at 171 West Main Street in a suburban/residential area in Hillsborough, Hillsborough County, NH. It is bordered by an abandoned residential property to the west, to

the north by the capped Hillsboro Municipal Solid Waste Landfill with a buffer of woods, to the east by commercial properties, and to the south by West Main Street with commercial properties and the northern bend of the Contoocook River.

Latitude: 43.111583
Longitude: -71.905333



Map 1: Property Boundary of the Site

3. Site characteristics

The approximately 9.5-acre Site is identified by the Hillsborough Assessing Department as Lot 184 on Tax Map 11P and includes three wood-framed buildings on concrete slab-on-grade, with metal roofs and metal siding. The primary structure (Building #1) is approximately 9,600 square feet and contains the office and manufacturing portions of Associated Electric (previously Hillsboro Laundry). It was reportedly built around 1970 and includes a high-bay work area added in the mid-1990s. An addition was added on to the northern portion of Building #1 in the late-1990s. Two other warehouse structures were constructed in the mid-1980s and early

1990s and have building footprints of approximately 5,000 square feet (Building #2) and 3,500 square feet (Building #3).

In 2002, operations at the Site ceased and according to the NH Secretary of State, the former operator, Associated Electric, Inc. was dissolved after it filed its last report. The property owner, Rosewald Industries, LLC, also filed its last annual report in 2002 and was administratively dissolved on September 1, 2004, by the NH Secretary of State. Currently one of the three buildings serves as a storage building for the town. Drums and containers containing oils, mixed and hazardous substances remain from the previous owner and operator.

Based on information in EPA's EJSCREEN environmental justice screening tool, zero out of 12 Environmental Justice Indexes for the area within a one-mile radius of the Site exceed the 80th percentile on a national basis. Within that radius there are:

- 1,363 residents,
- 3 schools; and
- the Contoocook River.

Please see the attached EJSCREEN standard report for more information.

Based on information in the Climate Mapping tool for Resilience and Adaptation, the following Climate Hazards has a National Risk Index Rating of Relatively Moderate in Hillsborough County: extreme heat and flooding. Please see the attached Climate Mapping tool for Resilience and Adaptation report for more information.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

On the Site, there are approximately 40-50 drums and 15-20 other containers throughout the buildings, some unmarked. EPA sampling efforts during the site investigation phase identified the presence of hazardous substances, as designated by section 101(14) of CERCLA, present in drums on the Site. The following list is not comprehensive.

Table 1

Contaminate	Media	Designation Under CERCLA
Methyl-t-Butyl Ether	Liquids/product (55-gal drums/containers)	Pollutant or Contaminant
1,1,1-Trichloroethane	Liquids/product (55-gal drums/containers)	Hazardous Substance
Benzene	Liquids/product (55-gal drums/containers)	Hazardous Substance
Toluene	Liquids/product (55-gal drums/containers)	Hazardous Substance
Chlorobenzene	Liquids/product (55-gal drums/containers)	Hazardous Substance
4-Methyl-2-Pentanone(MIBK)	Liquids/product (55-gal drums/containers)	Hazardous Substance
Ethylbenzene	Liquids/product (55-gal drums/containers)	Hazardous Substance
M/P Xylene	Liquids/product (55-gal drums/containers)	Pollutant or Contaminant
Ortho Xylene	Liquids/product (55-gal drums/containers)	Pollutant or Contaminant
Styrene	Liquids/product (55-gal drums/containers)	Hazardous Substance
Isopropylbenzene	Liquids/product (55-gal drums/containers)	Pollutant or Contaminant
N-Propylbenzene	Liquids/product (55-gal drums/containers)	Pollutant or Contaminant
Tert-Butylbenzene	Liquids/product (55-gal drums/containers)	Pollutant or Contaminant
1,3,5-Trimethylbenzene	Liquids/product (55-gal drums/containers)	Pollutant or Contaminant
1,2,4-Trimethylbenzene	Liquids/product (55-gal drums/containers)	Pollutant or Contaminant
Sec-Butylbenzene	Liquids/product (55-gal drums/containers)	Pollutant or Contaminant
1,3-Dichlorobenzene	Liquids/product (55-gal drums/containers)	Pollutant or Contaminant
Para-Isopropyltoluene	Liquids/product (55-gal drums/containers)	Pollutant or Contaminant
1,4-Dichlorobenzene	Liquids/product (55-gal drums/containers)	Hazardous Substance
1,2-Dichlorobenzene	Liquids/product (55-gal drums/containers)	Hazardous Substance
1,2,4-Trichlorobenzene	Liquids/product (55-gal drums/containers)	Hazardous Substance
Naphthalene	Liquids/product (55-gal drums/containers)	Hazardous Substance
1,2,3-Trichlorobenzene	Liquids/product (55-gal drums/containers)	Pollutant or Contaminant
2-Methylnaphthalene	Liquids/product (55-gal drums/containers)	Pollutant or Contaminant
4-Chlorophenyl-phenylether	Liquids/product (55-gal drums/containers)	Pollutant or Contaminant
bis(2-Ethylhexyl)phthalate	Liquids/product (55-gal drums/containers)	Hazardous Substance
Aroclor-1224	Liquids/product (55-gal drums/containers)	Hazardous Substance
Aroclor-1016	Liquids/product (55-gal drums/containers)	Hazardous Substance
Arsenic	Liquids/product (55-gal drums/containers)	Hazardous Substance
Copper	Liquids/product (55-gal drums/containers)	Hazardous Substance
Lead	Liquids/product (55-gal drums/containers)	Hazardous Substance
Zinc	Liquids/product (55-gal drums/containers)	Hazardous Substance

Due to the state of disrepair of the building and the inappropriate storage of the drums and containers (i.e. stacked, without lids or bungs, or proximity of incompatibles), the drums pose a

risk of release. Sampling results found numerous materials characterized as ignitable D001 wastes under Resource Conservation and Recovery Act (RCRA). The presence of these hazardous substances poses a substantial threat of fire or explosion. The sampled drums and containers show they contain mixed materials. The buildings are deteriorating and have cracks in the foundations. If there was a spill indoors, there is a threat of migration into the soil.

5. NPL status

The Site is not currently on the National Priorities List and has not received a Hazardous Ranking System rating.

6. Maps, pictures, and other graphic representations

Figure 1: View of stacked drums in Building 2, showing labels and remaining contents. *Taken: February 6, 2024*

Figure 2: View of drum PM-03 in Building No. 1. *Taken: February 27, 2024*

Figure 3: View of drum PM-07 in Building 1 with the bung missing.
Taken: February 28, 2024

Figure 4: View of the cap to an underground storage tank in Building 2 with cracks in the cement. *Taken: February 27, 2024*

Figure 5: View of drum PM-04 in Building 1. Cracks can be seen in the concrete slab beneath the drums.
Taken: February 27, 2024

B. Other Actions to Date

1. Previous actions

Prior to the Site Investigation in February 2024, EPA has not conducted any previous actions at the Site.

2. Current actions

Currently, no response actions have been conducted by EPA at the Site.

C. State and Local Authorities' Roles

1. State and local actions to date

As previously mentioned in the site description, as a result of an underground storage tank of heating oil removal, soil and groundwater samples were taken. These samples showed elevated levels of PCE and TCE. While removing the tank, solvent odor and a sheen were observed. This led to site investigations, including adding sampling wells for monitoring.

On July 24, 2008, NHDES issued Rosewald Industries a letter of deficiency for its above ground storage tank that was lacking secondary containment.

In 2013, NHDES issued a Groundwater Management Permit to Rosewald Industries. The permit required annual groundwater, surface water, and indoor air sampling for on-site and off-site properties.

On March 9, 2018, NHDES issued Rosewald Industries a Notice of Non-Compliance for its Groundwater Management Permit issued on July 17, 2013. NHDES files indicate that they did not receive sampling results from September 2015, 2016, and 2017. The groundwater permit expired in 2018.

In 2020, Sanborn, Head & Associates on behalf of the Central New Hampshire Regional Planning Commission, conducted a Site reconnaissance and found approximately fifty 55-gallon labeled and unlabeled drums and approximately 20 containers, above ground storage tanks, potential locations of underground storage tanks, and potentially PCB containing transformers. There are two abandoned above ground storage tanks, one 15,000-gallon tank that is empty but formerly contained oils with PCBs and a 275-gallon tank, still holding #2 heating oil. Given the unknown contents and the variety of containers throughout the building, NHDES Spill Response team

indicated significant sampling, collection and disposal effort is beyond their traditional response efforts. Beginning on September 1, 2019 and ending on March 18, 2020, the Central NH Regional Planning Commission did a Phase 1 Environmental Assessment using EPA Brownfields funding of $6,400.00 and conducted a Supplemental Assessment.

No removal or cleanup actions were conducted at this property by state or local entities.

2. Potential for continued State/local response

Following the EPA actions described herein, NHDES plans to demolish the buildings and conduct additional investigation of PCE and TCE soil/groundwater contamination in the building footprint.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants; [§300.415(b)(2)(i)];

Damaged and improperly stored drums are located throughout the property. Soil sampling shows that there is contamination present at the Site. This contamination cannot be fully characterized or addressed without removal of the drums and subsequent demolition of the buildings. Within 1000 feet of the property is the Contoocook River, which serves as a supplemental drinking water supply for the surrounding communities.

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release [§300.415(b)(2)(iii)];

There are approximately 40-50 drums and 15-20 smaller containers on the Site, left by previous owner/operators. These drums contain numerous hazardous substances. Given that the facility is no longer operational or maintained, there is a threat of release due to improperly stored drums. At least 10 of these drums are missing tops. There are cracks in the concrete foundation of the buildings that, in the case of a spill, could lead to the release of contaminantes outside of the building and into the environment.

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)];

Given the state of disrepair of the buildings, especially in the roofs and windows, there is potential for a weather event to cause a release. According to the Climate Mapping tool for Resilience and Adaptation report, Hillsborough County, NH is at a moderately increased risk for flooding and extreme heat. Since the drums and containers are stored on the ground floor, flooding could result in the release of contaminates into the water ways. In cases of extreme heat, there is increased possibility of fire and flashing of flammables.

Threat of fire or explosion [§300.415(b)(2)(vi)];

There are multiple RCRA D001 ignitable characteristic wastes on-site. There are also potentially incompatible chemicals in unsealed drums and containers staged together on the Site, which increases the possibility of explosion or fire. In the event of a catastrophic fire or explosion, a plume of airborne contaminates could impact nearby businesses or populations.

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)];

There are no other appropriate federal or state response mechanisms available to complete an action on this site. NHDES referred this site to EPA for assistance in removing the drums and containers.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this site may present an imminent and substantial endangerment to public health, or welfare, or the environment.

Actual or threatened releases of hazardous substances or pollutants or contaminants from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment. In accordance with OSWER Directive 9360.0-34 (August 19, 1993), an endangerment determination is made based on "appropriate Superfund policy or guidance, or on collaboration with a trained risk assessor," which is outlined and discussed in Section III above. "Appropriate sources include, but are not limited to, relevant action level or clean-up standards, Agency for Toxic Substances and Disease Registry documents or personnel, or staff toxicologists."

The contents of the drums on the Site show that there are mixed liquid hazardous materials that could prove dangerous to human health and the environment, in the case of a release. Sampling efforts show the presence of at least 21 hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. §9601(14). Many of the samples showed the presence of RCRA D001 ignitable wastes. The presence of improperly stored ignitable wastes increases the threat of fire or explosion on the Site. Table 2 shows some of the threats posed by the chemicals on the Site as reported by the health and toxicological information from ATSDR's toxicological profiles.

Table 2

Contaminate	Potential Health Risks
Toluene	Hearing loss, color vision loss, developmental delays
Benzene	Death, headaches, dizziness, vomiting, rapid heart rate, anemia, excessive bleeding
Naphthalene	Red blood cell damage, inflammation of the respiratory inflammation, lung damage, headaches, dizziness
PCBs Aroclor-1242	Liver and biliary tract cancer, liver damage, rash, acne, developmental delays

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

Specific removal activities will include the following:

- Conducting a site walk with EPA contractors to determine the necessary removal action resources;
- Mobilizing personnel and equipment;
- Developing and implementing the following plans:
  - Site Specific Health and Safety Plan;
  - Sampling and Analysis Plan; and
  - Community Involvement Plan;
- Providing security or a security guard service, as needed;
- Clearing vegetation and debris as needed;

- Controlling releases from drums and containers;
- Securing, segregating, and storing drums and containers;
- Consolidating drums and containers holding compatible materials;
- Treating hazardous materials on site;
- Planning for and executing proper sampling, characterization, and disposal of site-related hazardous materials at an EPA approved off-site disposal facilities;
- Demobilizing personnel and equipment; and
- Repairing response-related damage.

2. Community relations

The OSC will receive assistance from the EPA Community Involvement Coordinator to assist with all public relations activities. EPA will work closely with the community, state, town, and local businesses.

3. Contribution to remedial performance

The cleanup proposed in this Action Memorandum is designed to mitigate the threats to human health and the environment posed by the Site. The actions taken at the Site would be consistent with and will not impede any future responses.

4. Description of innovative technologies and sustainable approaches

In accordance with the December 23, 2013, Memorandum, updated August 2, 2016, issued by Office of Land and Emergency Management as well as the Region 1 Clean and Greener Policy for Contaminated Sites, greener cleanup practices should be considered for all cleanup projects. Greener cleanup is the practice of incorporating practices that minimize the environmental impacts of cleanup actions and maximize environmental and human benefit. Alternative technologies and sustainable approaches will be considered and incorporated, as appropriate, throughout the implementation of the removal action.

5. Applicable or relevant and appropriate requirements (ARARs)

Federal ARARs:

Clean Water Act, National Pollutant Discharge Elimination System (NPDES), 40 C.F.R. Parts 122 – 125; 122.26: Establishes the specifications for discharging pollutants from any point source into the waters of the U.S. Also, includes storm water standards for construction sites over one

acre. Removal activities will be managed to prevent stormwater discharge from the Site. To the extent water generated from the removal action needs to be discharged to the river, applicable discharge standards will be met.

Clean Water Act, 40 C.F.R. Sections 122.26(c)(ii)(C) and 122.44(k): NPDES regulations for storm water control and management.

40 C.F.R. Part 761.61: Toxic Substances Control Act (TSCA) requirements for cleanup and disposal of PCBs.

40 C.F.R. 761.61(a): requirements for off-site disposal of bulk PCB remediation wastes and porous and non-porous PCB remediation waste – bulk remediation waste will be managed and disposed of off-site in accordance with these standards.

40 C.F.R. 761.65: Requirements for temporary TSCA regulated waste storage, including design requirements. Proper design considerations will be implemented to ensure that all temporary storage of TSCA-regulated waste satisfies the requirements of the regulations.

40 C.F.R. Section 761.79: TSCA Decontamination standards and procedures for removing PCBs, which are regulated for disposal.

Clean Water Act Section 404(b), (40 C.F.R. Parts 230 and 231, 33 C.F.R. Parts 320-323, and 33 C.F.R. Part 332): No activity that adversely affects a wetland shall be permitted if a practicable alternative with lesser impacts is available. Controls discharge of dredged or fill material to protect aquatic ecosystems. Any wetlands altered by the cleanup will be restored as required by regulatory standards.

Clean Water Act Federal Water Quality Criteria, Section 304(a), 40 C.F.R. 131.11: National Recommended Water Quality Criteria for chemicals for both the protection of human health and the protection of aquatic life; to be used as water quality monitoring standards for any work in or adjacent to wetlands or water bodies.

Floodplain Management and Protection of Wetlands, (44 C.F.R. Part 9): Regulations that set forth the policy, procedure and responsibilities to implement and enforce Executive Order 11988 (Floodplain Management) and Executive Order 11990 (Protection of Wetlands). Prohibits activities that adversely affect a federally-regulated wetland unless there is no practicable alternative and the proposed action includes all practicable measures to minimize harm to wetlands that may result from such use. Requires the avoidance of impacts associated with the temporary or permanent occupancy and modification of federally-designated 100-year and

500-year floodplain. Waste left in place within a floodplain needs to be needs to be protected from flooding so that there is no release of contamination in up to a 500-year flood event.

Fish and Wildlife Coordination (50 C.F.R. Part 297; 16 U.S.C. Section 661 et seq.): Any modification of a body of water requires consultation with the U.S. Fish and Wildlife Services and the appropriate state wildlife agency to develop measures to prevent, mitigate or compensate for losses of fish and wildlife. This requirement is addressed under CWA Section 404 requirements.

Endangered Species Act (50 C.F.R. 402; 16 USC 1531 *et seq.*, 50 C.F.R. 200): Requires federal agencies to ensure continued existence of any endangered or threatened species and that their habitats will not be jeopardized by a site action.

National Historical Preservation Act (16 U.S.C. 469 *et seq.*; 36 C.F.R. Part 65): When a federal agency finds, or is notified, that its activities in connection with a federal construction project may cause irreparable loss or destruction of significant scientific, pre-historical, historical, or archeological data, the substantive standards under the Act will be met. If, during the removal action, it is determined that the removal action may cause irreparable loss or destruction of significant scientific, pre-historical, historical, or archaeological data, the substantive standards under the Act will be met.

New Hampshire ARARs:

40 C.F.R. Parts 260-262 and 264 Resource Conservation and Recovery Act, Subtitle C- Hazardous Waste Identification and Listing Regulations; Generator and Handler Requirements, Closure and Post-Closure – New Hampshire has been delegated the authority to administer these RCRA standards through its state hazardous waste management regulations. Waste generated will be tested to determine whether it exceeds hazardous waste thresholds and, if so, the hazardous waste will be managed on-site and until such time as it is shipped to an EPA-approved off-site disposal location.

The OSC will coordinate with state officials to identify additional state ARARs, if any. In accordance with the National Contingency Plan and EPA Guidance Documents, the OSC will determine the applicability and practicability of complying with each ARAR that is identified in a timely manner.

6. Project schedule

This project is estimated to be completed within three months after the Action Memorandum is signed.

B. Estimated Costs

COST CATEGORY		CEILING
REGIONAL REMOVAL ALLOWANCE COSTS:		
ERRS Contractor		$400,000.00
Interagency Agreement		$ 0.00
OTHER EXTRAMURAL COSTS NOT FUNDED FROM THE REGIONAL ALLOWANCE:		
START Contractor		$100,000.00
Extramural Subtotal		$500,000.00
Extramural Contingency	20%	$100,000.00
TOTAL, REMOVAL ACTION CEILING		**$600,000.00**

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If the drums and other containers are not removed from the property, the Site conditions will condition will continue to worsen, increasing the likelihood of a release of hazardous materials, fire, or explosion.

VII. OUTSTANDING POLICY ISSUES

There are no precedent-setting policy issues associated with this Site.

VIII. ENFORCEMENT ... For Internal Distribution Only

See attached Confidential Enforcement Strategy.

The total EPA costs for this removal action that will be eligible for cost recovery are estimated to be $600,000 (extramural costs) + $58,800 (EPA intramural costs) = $658,800.00 X 1.3933 (regional indirect rate) = **$917.906.04**[1].

[1]Direct Costs include direct extramural costs $600,000 and direct intramural costs $58,800. Indirect costs are calculated by using regional indirect rate in effect at time cost estimate is prepared, and is expressed as a percentage of the 39.33% (effective January 11, 2024) x $658,800, consistent with EPA's full cost

IX. RECOMMENDATION

This decision document represents the selected removal action for the Associated Electric Site in Hillsborough, NH, developed in accordance with CERCLA, as amended, and is not inconsistent with the National Contingency Plan. The basis for this decision will be documented in the administrative record to be established for the Site.

Conditions at the Site meet the National Contingency Plan Section 300.415 (b) (2) criteria for a removal action due to the following:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [§300.415(b)(2)(i)];

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release [§300.415(b)(2)(iii)];

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)];

Threat of fire or explosion [§300.415(b)(2)(vi)];

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)];

I recommend that you approve the proposed removal action. The total extramural removal action project ceiling if approved will be **$600,000**.

APPROVAL: BRYAN OLSON Digitally signed by BRYAN OLSON Date: 2024.06.28 19:34:30 -04'00' DATE: _____

accounting methodology. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

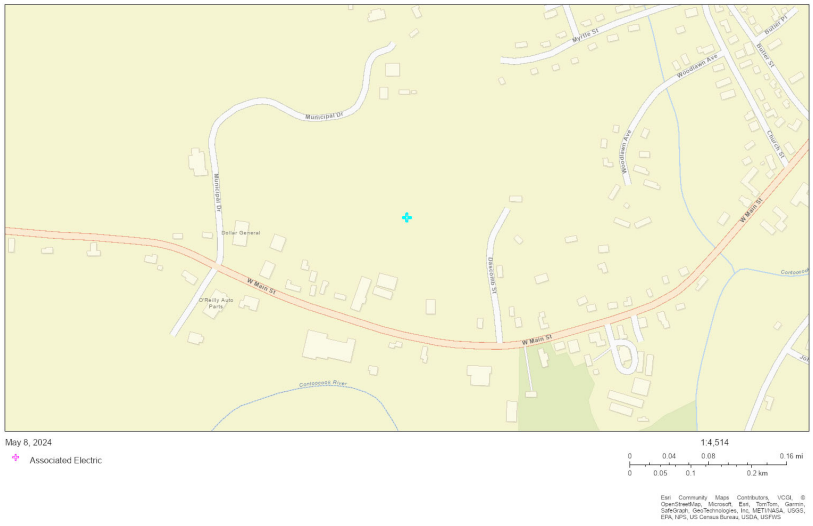
EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

Hills, NH

1 mile Ring Centered at 43.111589,-71.905335
Population: 1,363
Area in square miles: 3.14

A3 Landscape



COMMUNITY INFORMATION

Low income: 30 percent	People of color: 13 percent	Less than high school education: 8 percent	Limited English households: 0 percent
Unemployment: 1 percent	Persons with disabilities: 18 percent	Male: 45 percent	Female: 55 percent
79 years Average life expectancy	$37,809 Per capita income	Number of households: 624	Owner occupied: 79 percent

BREAKDOWN BY RACE

White: 87%	Black: 0%	American Indian: 0%	Asian: 0%
Hawaiian/Pacific Islander: 0%	Other race: 0%	Two or more races: 6%	Hispanic: 6%

BREAKDOWN BY AGE

From Ages 1 to 4	1%
From Ages 1 to 18	17%
From Ages 18 and up	83%
From Ages 65 and up	25%

LIMITED ENGLISH SPEAKING BREAKDOWN

Speak Spanish	0%
Speak Other Indo-European Languages	0%
Speak Asian-Pacific Island Languages	0%
Speak Other Languages	0%

Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race.
Source: U.S. Census Bureau, American Community Survey (ACS) 2017 -2021. Life expectancy data comes from the Centers for Disease Control.

LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	97%
Spanish	2%
French, Haitian, or Cajun	1%
Total Non-English	3%

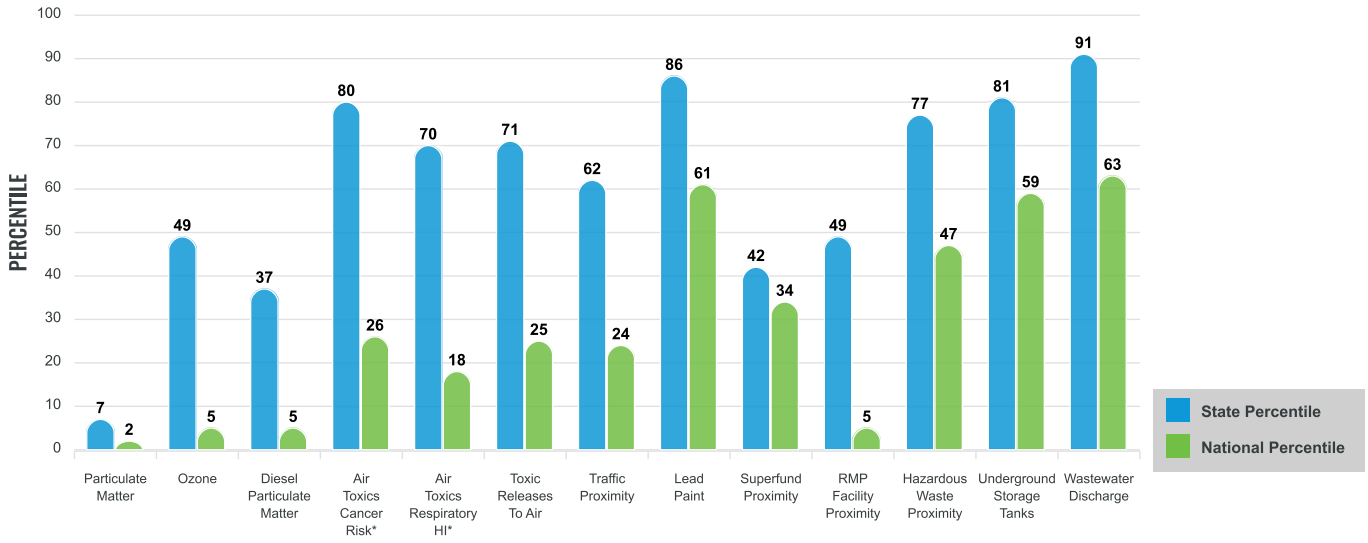
Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the EJScreen website.

EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

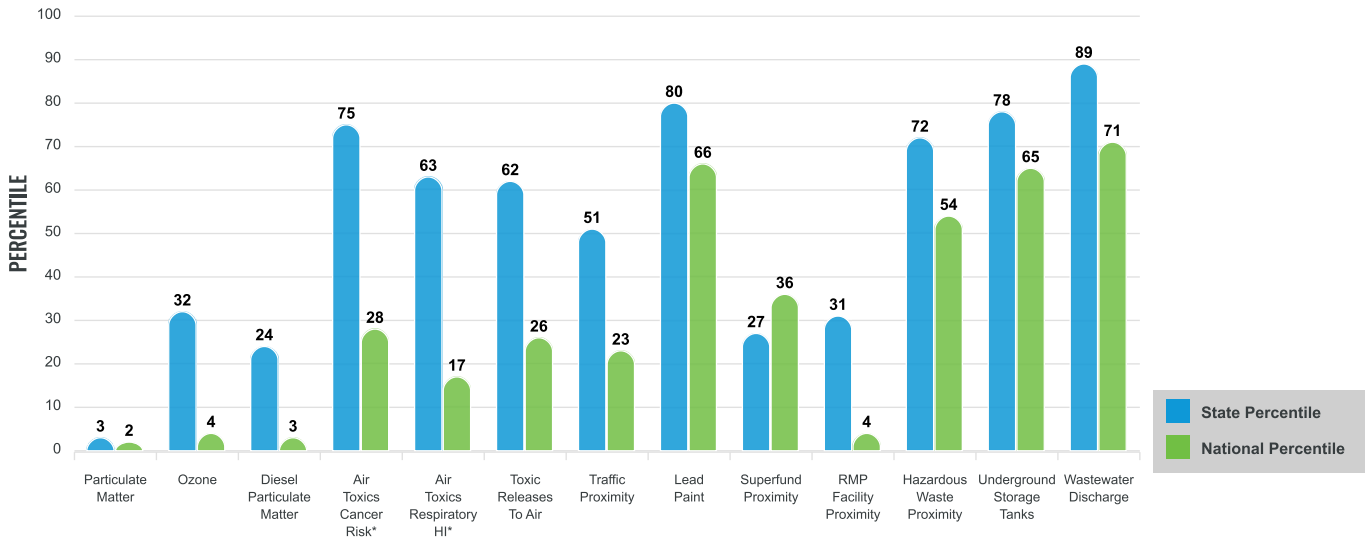
EJ INDEXES FOR THE SELECTED LOCATION



SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for 1 mile Ring Centered at 43.111589,-71.905335

EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
POLLUTION AND SOURCES					
Particulate Matter (µg/m^3)	4.38	5.19	1	8.08	1
Ozone (ppb)	51.6	52.8	23	61.6	3
Diesel Particulate Matter (µg/m^3)	0.0447	0.0994	16	0.261	3
Air Toxics Cancer Risk* (lifetime risk per million)	20	19	7	25	5
Air Toxics Respiratory HI*	0.2	0.21	6	0.31	4
Toxic Releases to Air	91	260	41	4,600	23
Traffic Proximity (daily traffic count/distance to road)	13	80	35	210	19
Lead Paint (% Pre-1960 Housing)	0.51	0.33	77	0.3	74
Superfund Proximity (site count/km distance)	0.034	0.18	20	0.13	31
RMP Facility Proximity (facility count/km distance)	0.029	0.14	21	0.43	4
Hazardous Waste Proximity (facility count/km distance)	0.59	1	58	1.9	52
Underground Storage Tanks (count/km^2)	4.7	3.8	77	3.9	76
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.63	0.26	98	22	90
SOCIOECONOMIC INDICATORS					
Demographic Index	22%	16%	79	35%	36
Supplemental Demographic Index	12%	10%	72	14%	44
People of Color	13%	11%	71	39%	28
Low Income	30%	20%	77	31%	55
Unemployment Rate	1%	4%	32	6%	26
Limited English Speaking Households	0%	1%	0	5%	0
Less Than High School Education	8%	7%	67	12%	49
Under Age 5	1%	4%	19	6%	16
Over Age 64	25%	20%	75	17%	81
Low Life Expectancy	19%	18%	63	20%	45

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: https://www.epa.gov/haps/air-toxics-data-update.

Sites reporting to EPA within defined area:

Superfund 0
Hazardous Waste, Treatment, Storage, and Disposal Facilities 1
Water Dischargers 4
Air Pollution 4
Brownfields 4
Toxic Release Inventory 1

Other community features within defined area:

Schools 3
Hospitals 0
Places of Worship 2

Other environmental data:

Air Non-attainment ..... No
Impaired Waters ..... Yes

Selected location contains American Indian Reservation Lands* ..... No
Selected location contains a "Justice40 (CEJST)" disadvantaged community ..... No
Selected location contains an EPA IRA disadvantaged community ..... Yes

Report for 1 mile Ring Centered at 43.111589,-71.905335

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS

INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	19%	18%	63	20%	45
Heart Disease	5.5	5.8	43	6.1	39
Asthma	11.6	10.9	79	10	86
Cancer	6.4	6.8	31	6.1	52
Persons with Disabilities	12%	13.3%	43	13.4%	46

CLIMATE INDICATORS

INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	9%	12%	47	12%	63
Wildfire Risk	0%	0%	0	14%	0

CRITICAL SERVICE GAPS

INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	33%	10%	98	14%	91
Lack of Health Insurance	6%	6%	58	9%	47
Housing Burden	No	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	No	N/A	N/A	N/A	N/A

Report for 1 mile Ring Centered at 43.111589,-71.905335

Hillsborough County, New Hampshire

Total Population
413,035

% Population with Income Below Poverty
8%

Building Codes Hazard Resistance
Lower Resistance

% Population Disadvantaged
13.46%

National Risk Index Rating
Relatively Low
Source: FEMA National Risk Index

Billion-Dollar Weather and Climate Disasters

Drought

Future Climate Indicators

Indicator	Modeled History (1976 - 2005)	Early Century (2015 - 2044)		Mid Century (2035 - 2064)		Late Century (2070 - 2099)	
		Lower Emissions	Higher Emissions	Lower Emissions	Higher Emissions	Lower Emissions	Higher Emissions
	Min - Max	Min - Max	Min - Max	Min - Max	Min - Max	Min - Max	Min - Max
Precipitation:							
Average annual total precipitation	**45"** 44 - 46	**47"** 44 - 52	**47"** 43 - 51	**47"** 43 - 53	**48"** 45 - 51	**48"** 44 - 52	**50"** 46 - 56
Days per year with precipitation (wet days)	**191 days** 186 - 196	**191 days** 181 - 201	**190 days** 179 - 198	**190 days** 179 - 199	**188 days** 173 - 199	**189 days** 177 - 202	**187 days** 162 - 203
Days per year with no precipitation (dry days)	**174 days** 169 - 179	**175 days** 164 - 184	**175 days** 167 - 186	**176 days** 166 - 186	**177 days** 166 - 192	**176 days** 163 - 188	**179 days** 162 - 203
Maximum number of consecutive dry days	**11 days** 10 - 12	**11 days** 10 - 13	**11 days** 10 - 13	**11** days 10 - 13	**11 days** 10 - 13	**11 days** 10 - 13	**12 days** 10 - 14
Temperature thresholds:							
Annual days with maximum temperature > 90 °F	**4 days** 4 - 6	**13 days** 7 - 23	**14 days** 7 - 21	**19 days** 8 - 34	**26 days** 11 - 42	**26 days** 11 - 49	**54 days** 17 - 87
Annual days with maximum temperature > 100 °F	**0 days** 0 - 0	**0 days** 0 - 2	**0 days** 0 - 2	**1 days** 0 - 4	**2 days** 0 - 7	**2 days** 0 - 4	**9 days** 0 - 29

N/A = Data Not Available for the selected area

Source: Census Bureau, CEQ, Esri, FEMA, MRLC, NOAA, UCSD

Hillsborough County, New Hampshire

Total Population
413,035

% Population with Income Below Poverty
8%

Building Codes Hazard Resistance
Lower Resistance

% Population Disadvantaged
13.46%

National Risk Index Rating
Relatively Low
Source: FEMA National Risk Index

Billion-Dollar Weather and Climate Disasters

U.S. Climate Resilience Toolkit

Source: Census Bureau, CEQ, Esri, FEMA, MRLC, NOAA, UCSD

Wildfire

Future Climate Indicators

Indicator	Modeled History (1976 - 2005)	Early Century (2015 - 2044)		Mid Century (2035 - 2064)		Late Century (2070 - 2099)	
		Lower Emissions	Higher Emissions	Lower Emissions	Higher Emissions	Lower Emissions	Higher Emissions
	Min - Max	Min - Max	Min - Max	Min - Max	Min - Max	Min - Max	Min - Max
Precipitation:							
Days per year with no precipitation (dry days)	**174 days** 169 - 179	**175 days** 164 - 184	**175 days** 167 - 186	**176 days** 166 - 186	**177 days** 166 - 192	**176 days** 163 - 188	**179 days** 162 - 203
Maximum number of consecutive dry days	**11 days** 10 - 12	**11 days** 10 - 13	**11 days** 10 - 13	**11 days** 10 - 13	**11 days** 10 - 13	**11 days** 10 - 13	**12 days** 10 - 14
Days per year with precipitation (wet days)	**191 days** 186 - 196	**191 days** 181 - 201	**190 days** 179 - 198	**190 days** 179 - 199	**188 days** 173 - 199	**189 days** 177 - 202	**187 days** 162 - 203
Temperature thresholds:							
Annual days with maximum temperature > 90°F	**4 days** 4 - 6	**13 days** 7 - 23	**14 days** 7 - 21	**19 days** 8 - 34	**26 days** 11 - 42	**26 days** 11 - 49	**54 days** 17 - 87
Annual days with maximum temperature > 100°F	**0 days** 0 - 0	**0 days** 0 - 2	**0 days** 0 - 2	**1 days** 0 - 4	**2 days** 0 - 7	**2 days** 0 - 4	**9 days** 0 - 29

N/A = Data Not Available for the selected area

Hillsborough County, New Hampshire

Total Population
413,035

% Population with Income Below Poverty
8%

Building Codes Hazard Resistance
Lower Resistance

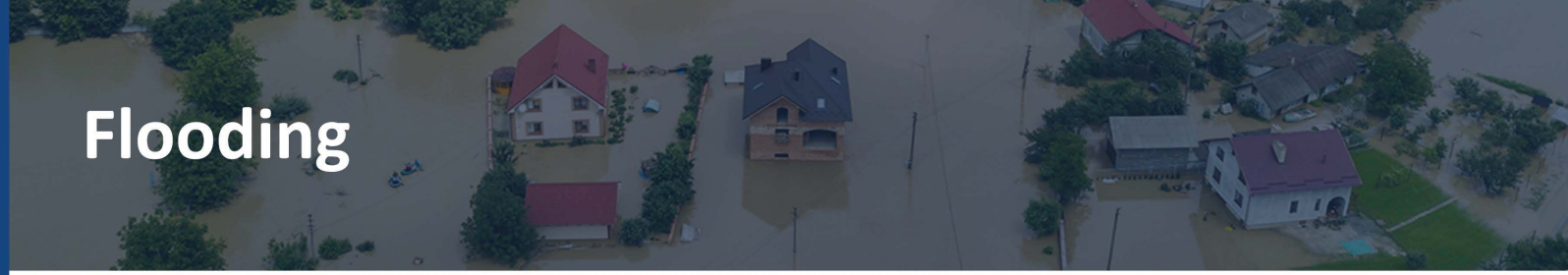
% Population Disadvantaged
13.46%

National Risk Index Rating
Relatively Moderate
Source: FEMA National Risk Index

Billion-Dollar Weather and Climate Disasters

U.S. Climate Resilience Toolkit

Source: Census Bureau, CEQ, Esri, FEMA, MRLC, NOAA, UCSD



Flooding

Future Climate Indicators

Indicator	Modeled History (1976 - 2005)	Early Century (2015 - 2044)		Mid Century (2035 - 2064)		Late Century (2070 - 2099)	
		Lower Emissions	Higher Emissions	Lower Emissions	Higher Emissions	Lower Emissions	Higher Emissions
	Min - Max	Min - Max	Min - Max	Min - Max	Min - Max	Min - Max	Min - Max
Precipitation:							
Annual average total precipitation	**45"** 44 - 46	**47"** 44 - 52	**47"** 43 - 51	**47"** 43 - 53	**48"** 45 - 51	**48"** 44 - 52	**50"** 46 - 56
Days per year with precipitation (wet days)	**191 days** 186 - 196	**191 days** 181 - 201	**190 days** 179 - 198	**190 days** 179 - 199	**188 days** 173 - 199	**189 days** 177 - 202	**187 days** 162 - 203
Maximum period of consecutive wet days	**11 days** 10 - 12	**12 days** 10 - 13	**12 days** 11 - 13	**11 days** 10 - 14	**12 days** 10 - 13	**12 days** 10 - 13	**12 days** 9 - 14
Annual days with:							
Annual days with total precipitation > 1inch	**5 days** 5 - 6	**6 days** 5 - 8	**6 days** 5 - 8	**7 days** 5 - 8	**7 days** 6 - 9	**7 days** 6 - 9	**8 days** 6 - 10
Annual days with total precipitation > 2 inches	**0 days** 0 - 1	**0 days** 0 - 1	**1 days** 0 - 1	**1 days** 0 - 1	**1 days** 0 - 1	**1 days** 0 - 1	**1 days** 0 - 1
Annual days with total precipitation > 3 inches	**0 days** 0 - 0	**0 days** 0 - 0	**0 days** 0 - 0	**0 days** 0 - 0	**0 days** 0 - 0	**0 days** 0 - 0	**0 days** 0 - 0
Annual days that exceed 99th percentile precipitation	**6 days** 5 - 6	**6 days** 6 - 7	**7 days** 6 - 7	**7 days** 6 - 8	**8 days** 7 - 8	**8 days** 7 - 8	**9 days** 8 - 10
Days with maximum temperature below 32 °F	**41 days** 37 - 44	**29 days** 12 - 37	**28 days** 16 - 35	**24 days** 9 - 32	**21 days** 11 - 28	**20 days** 5 - 29	**9 days** 2 - 19

N/A = Data Not Available for the selected area

Hillsborough County, New Hampshire

Total Population
413,035

% Population with Income Below Poverty
8%

Building Codes Hazard Resistance
Lower Resistance

% Population Disadvantaged
13.46%

National Risk Index Rating
Not Applicable
Source: FEMA National Risk Index

Billion-Dollar Weather and Climate Disasters

U.S. Climate Resilience Toolkit

Source: Census Bureau, CEQ, Esri, FEMA, MRLC, NOAA, UCSD

Coastal Inundation

Future Climate Indicators

Indicator	Modeled History (1976 - 2005)	Early Century (2015 - 2044)		Mid Century (2035 - 2064)		Late Century (2070 - 2099)	
		Lower Emissions	Higher Emissions	Lower Emissions	Higher Emissions	Lower Emissions	Higher Emissions
	Min - Max	Min - Max	Min - Max	Min - Max	Min - Max	Min - Max	Min - Max
Sea level rise:							
Percent of selected county impacted by global sea level rise	N/A	0%	0%	0%	0%	0%	0%

For more information on sea level changes, see the Interagency Sea Level Rise Scenario Tool

N/A = Data Not Available for the selected area

Hillsborough County, New Hampshire

Total Population
413,035

% Population with Income Below Poverty
8%

Building Codes Hazard Resistance
Lower Resistance

% Population Disadvantaged
13.46%

National Risk Index Rating
Relatively Moderate
Source: FEMA National Risk Index

Billion-Dollar Weather and Climate Disasters

U.S. Climate Resilience Toolkit

Source: Census Bureau, CEQ, Esri, FEMA, MRLC, NOAA, UCSD

Extreme Heat

Future Climate Indicators

Indicator	Modeled History (1976 - 2005)	Early Century (2015 - 2044)		Mid Century (2035 - 2064)		Late Century (2070 - 2099)	
		Lower Emissions	Higher Emissions	Lower Emissions	Higher Emissions	Lower Emissions	Higher Emissions
	Min - Max	Min - Max	Min - Max	Min - Max	Min - Max	Min - Max	Min - Max
Temperature thresholds:							
Annual days with maximum temperature > 90°F	**4 days** 4 - 6	**13 days** 7 - 23	**14 days** 7 - 21	**19 days** 8 - 34	**26 days** 11 - 42	**26 days** 11 - 49	**54 days** 17 - 87
Annual days with maximum temperature > 95°F	**1 days** 0 - 1	**3 days** 1 - 8	**3 days** 1 - 6	**5 days** 1 - 14	**8 days** 2 - 16	**8 days** 2 - 20	**26 days** 4 - 55
Annual days with maximum temperature > 100°F	**0 days** 0 - 0	**0 days** 0 - 2	**0 days** 0 - 2	**1 days** 0 - 4	**2 days** 0 - 7	**2 days** 0 - 4	**9 days** 0 - 29
Annual days with maximum temperature > 105°F	**0 days** 0 - 0	**0 days** 0 - 0	**0 days** 0 - 0	**0 days** 0 - 1	**0 days** 0 - 2	**0 days** 0 - 2	**3 days** 0 - 17
Annual temperature:							
Annual single highest maximum temperature °F	**93 °F** 92 - 94	**97 °F** 95 - 102	**97 °F** 94 - 101	**98 °F** 95 - 103	**100 °F** 96 - 105	**100 °F** 96 - 106	**105 °F** 98 - 116
Annual highest maximum temperature averaged over a 5-day period °F	**88 °F** 87 - 89	**91 °F** 89 - 95	**92 °F** 89 - 93	**92 °F** 90 - 97	**94 °F** 90 - 98	**94 °F** 91 - 99	**99 °F** 92 - 110
Cooling degree days (CDD)	**396 degree-days** 350 - 443	**630 degree-days** 484 - 896	**660 degree-days** 509 - 826	**759 degree-days** 579 - 1,054	**895 degree-days** 658 - 1,221	**905 degree-days** 570 - 1,318	**1,458 degree-days** 887 - 2,101

N/A = Data Not Available for the selected area