



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

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

DATE: December 20, 2024

SUBJ: Site Investigation Closure Memorandum
Bradford Veneer and Panel Site
131 Mill Street
Bradford, VT 05033

FROM: Jacques Elias, On-Scene Coordinator
Emergency Response and Removal Section II

THRU: Ted Bzenas, Manager
Emergency Response and Removal Section I

TO: Bradford Veneer and Panel 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 Bradford Veneer and Panel Site ("Site") in Bradford, Vermont. 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 analytical results generated by EPA's Superfund Technical Assessment and Response Team (START) as part of EPA Site Investigation (SI) Reports with sampling date of September 10, 2024. These consist of both field observations, documentation photos, and laboratory analysis for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), pesticides, and metals analyses. All the drum/product samples were submitted to the EPA Laboratory Services and Applied Science Divisions (LSASD) laboratory.

- ii. Site walk with EPA, START, and the Vermont Department of Environmental Conservation on August 14, 2024.
 - iii. The Site Investigation on September 10-11, 2024.
 - iv. Generating a PA/SI report by EPA's contractor, titled *BRADFORD VENEER & PANEL SITE BRADFORD, ORANGE COUNTY, VERMONT 14 AUGUST 2024 AND 10 AND 11 SEPTEMBER 2024* dated November 2024.
- 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**

Contaminant	Media
2-Propanone (acetone)	Liquids/product (55-gal drums/containers)
Toluene	Liquids/product (55-gal drums/containers)
Ethylbenzene	Liquids/product (55-gal drums/containers)
M/P Xylene	Liquids/product (55-gal drums/containers)
Ortho Xylene	Liquids/product (55-gal drums/containers)
N-Propylbenzene	Liquids/product (55-gal drums/containers)
1,3,5-Trimethylbenzene	Liquids/product (55-gal drums/containers)
1,2,4-Trimethylbenzene	Liquids/product (55-gal drums/containers)
Naphthalene	Liquids/product (55-gal drums/containers)
bis(2-Ethylhexyl)phthalate	Liquids/product (55-gal drums/containers)

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. This decision is based and supported by the large volume of abandoned containers containing various hazardous substances. The building is unsecured with evidence of trespassing, raising the risk of a fire. The lack of power and extreme temperature swings has stressed containers and contents, and the building remains unmanaged and the containers will continue to deteriorate without intervention. There are no available resources from the local or state government to address this problem. . On September 10, 2024, EPA conducted representative sampling of the drums and containers which laboratory analysis confirmed the presence of acetone, toluene, ethylbenzene, xylenes, naphthalene, and other Hazardous Substances and Pollutant or Contaminates consistent with stains, glues, and other furniture/panel making processes. After a site review meeting discussing proposed actions, the site team concurs with a removal action moving forward.

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 warranted. Section 5 below documents whether a release or potential threat of release under CWA, as amended by OPA, has been determined.

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.
- cc: Matt Audet, Acting Branch Manager, Emergency Response and Removal, Catherine Young, Acting Manager, Emergency Response and Removal Section II, Ted Bzenas, Manager, Emergency Response and Removal Section I, SEMD (w/o attachments)
Ross Gilleland, Chief, Remedial Policy, Contracts, and Site Assessment Section, SEMD (w/o attachments)
Ashley Pierce, Enforcement Coordinator, Operations Branch, SEMD (w/o attachments)
Stacy Greendlinger, Enforcement Coordinator, Operations Branch, SEMD (w/o attachments)
Jonathan Onufryk, Operations Branch, SEMD (w/o attachments)

Micheal Nucci: Vermont DEC

Jonah Richard: Perspective Purchaser

Garry Moore: Director of Emergency Management town of Bradford.

Encl: PA/SI Report