



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

DATE: January 16, 2008

SUBJ: Site Investigation Closure Memorandum
Capehart Mill Site
Off of North Main Street at the end of Fifth Street
Norwich, CT

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

THRU: Steven R. Novick, Chief
Emergency Response and Removal Section II, EPRB, OSRR

TO: Capehart Mill 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 Capehart Mill Site ("Site") in Norwich, Connecticut. 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 Emergency Incident Field Report generated by CTDEP regarding Case # 2007-04445, reported on July 12, 2007.
 - ii. Review of the *Final Phase II Field Investigation Report, Former Capehart Facility*, generated by GEI Consultants, Inc., dated August 2000.
 - iii. Review of the *Draft Phase III Field Investigation, Former Capehart Facility*, generated by GEI Consultants, Inc., dated January 2001.
 - iv. The Removal Site Investigation conducted on September 9, 2007 and September 26, 2007.

- v. Generating a PA/SI report by EPA's contractor, titled *Removal Program Preliminary Assessment/Site Investigation Report For The Capehart Mill Site Norwich, New London County, Connecticut*, dated January 2008.
- 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>
Polychlorinated Biphenyls (PCBs)	Floor sweeping
Lead	Floor sweeping
Semivolatile Organic Compounds (SVOCs): Anthracene, Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Benzo(g,h,i)perylene, Benzo(k)fluoranthene, Chrysene	Soil
Asbestos	Friable bulk material, boiler and pipe insulation material

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.
 - ☒ 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 of the United States 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. Analytical results from the samples collected during PA/SI indicate there are high levels of hazardous substances such as PCBs, metals, and SVOCs in surficial soils that pose a contact threat. In addition, friable asbestos throughout the site pose a threat of release into the environment and potential exposure to nearby residents.
- 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 existence 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. Prior oil release from this Site into the Shetucket River has been addressed by CTDEP. Because the oil contained PCBs, that response action falls under CERCLA authority.
- cc: Steven R. Novick Chief, Emergency Response and Removal Section II, OSRR (w/o attachments)
Meghan Cassidy, Chief, Technical Support & Site Assessment Section, OSRR (w/o attachments)
Cheryl O'Halloran, EPRB, OSRR (w/o attachments)
Sharon Fennelly, Enforcement Coordinator, ERRS II, OSRR (w/o attachments)
Brian Emanuelson, CTDEP
Kenneth Scandariato, Fire Chief, City of Norwich Fire Department
Gloria K. Levy, Vice-President, Foot of Fifth, Inc.

Encl: PA/SI Report