



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I

**DATE:** December 2, 2008

**SUBJ:** Site Investigation Closure Memorandum  
St. John's Cemetery Site  
500 Moose Hill Road  
Monroe, CT 06468

**FROM:** Catherine Young, On-Scene Coordinator *Catherine Young*  
Emergency Response and Removal Section I, EPRB, OSRR

**THRU:** David McIntyre, Chief *DMcI*  
Emergency Response and Removal Section I, EPRB, OSRR

**TO:** St. John's Cemetery 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 St John's Cemetery Site ("Site") in Monroe, CT. 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 Connecticut Department of Environmental Protection (CTDEP) from York Analytical Laboratories, Inc., dated November 18, 2008;
    - ii. Site visit on November 25, 2008 with CTDEP;
    - iii. Interviews with Local and State officials familiar with the Site.

- iv. Completing PA and SI forms dated December 2, 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>
PCBs	soil, drums
Pesticides	soil, drums
VOCs	soil, drums
PAHs	soil, drums

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

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

Threat  X  No Threat \_\_\_\_\_ Evaluation Not Necessary \_\_\_\_\_

- b. Endangerment to the ecosystem:

Threat  X  No Threat \_\_\_\_\_ Evaluation Not Necessary \_\_\_\_\_

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.

- ( X ) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
- ( X ) The availability of other appropriate Federal or State response mechanisms to respond to the release.
- ( X ) Other situations or factors that may pose threats to public health or welfare of the United States or the environment.
- ( ) Threat of fire or explosion

- 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.
- 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 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. (No oil or oil products were discovered at the site.)

cc: David McIntyre, Chief, Emergency Response and Removal Section I, OSRR  
Meghan Cassidy, Chief, Technical Support & Site Assessment Section, OSRR  
Patti Ludwig, HSS, OSRR  
Brenda Haslett, HSR, OSRR

Matt Williamson, CTDEP  
Matt Adzima, St. John the Baptist Greek Catholic Cemetery Association, Inc.  
Patrice A. Sulik, Trumbull Monroe Health District

Encl: PA form and SI form





500 Moose Hill Rd, Monroe, CT 06468





**EPA REGION I  
REMOVAL PRELIMINARY ASSESSMENT**

---

---

**Site Name and Location**

---

---

**Name:** St John's Cemetery    **Location:** 500 Moose Hill Road  
**Town:** Monroe                    **County:** Fairfield                    **State:** CT

**Site Status:**            NPL NON-NPL            RCRA    TSCA  
                                 ACTIVE ABANDONED    OTHER

Attached USGS Map of Location                    Site I.D. No.:

**Latitude:** 41° 19' 20.80" North    **Longitude:** -73° 12' 18.48 " West

---

---

**Referral**

---

---

Citizen                    City/Town                    State                    Preremedial  
RCRA                    Other:  
**Name of referring party:** Matt Williamson                    **Telephone:**(860) 418-5976  
**Address:**

**Contacts Identified**

- 1)                    **Telephone:**( )
- 2)                    **Telephone:**( )
- 3)                    **Telephone:**( )

---

---

**Source of Information**

---

---

Verbal:  
 Report:  
 Other:

---

---

**Potential Responsible Parties**

---

---

**Owner:** St. John the Baptist Greek Catholic Cemetery Association, Inc.

**Address:** 50 Paradise Green Place, Stratford, CT  
**Telephone:**( )

## REMOVAL PRELIMINARY ASSESSMENT

---

---

### Site Access

---

---

**Authorizing Person:** Matt Adzima

**Date:** November 26, 2008     **Obtained**             **Verbal**  
**Telephone:** ( )                     **Not Obtained**         **Written**

---

---

### Physical Site Characterization

---

---

**Background Information:**

St. Johns Cemetery is located along Moose Hill Road in Monroe, CT. Prior to its current use as a cemetery, the property was used as an airport hanger. The Site covers an area of approximately 52.42 acres, is relatively flat and is located within a residential area.

**Description of Substances Possibly Present, Known or Alleged:**

Drums and containers have been identified in wooded areas of the property located at a rear section of the cemetery. Analytical results of the material in the drums indicate polychlorinated biphenyls (PCB's). Soil sample data taken from the site indicates the presence semi-volatile organic compounds (SVOC's) and volatile organic compounds (VOC's).

---

---

### Existing Analytical Data

---

---

**Real-Time Monitoring Data:**

**Sampling Data:** CTDEP analytical data from York Analytical Laboratories, Inc., dated November 18, 2008

---

---

### Potential Threat

---

---

Description of potential hazards to environment and/or population-identify any of the criteria for a Removal Action (from NCP) that may be met by the site under 40 CFR 300.415 [b] [2].

- i. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants.
- ii. Actual or potential contamination of drinking water supplies or sensitive ecosystems.
- iii. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.

## REMOVAL PRELIMINARY ASSESSMENT

---

---

### Potential Threat (Concluded)

---

---

- iv. High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.
- v. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
- vii. The availability of other appropriate federal or state response mechanisms to respond to the release.
- viii. Other situations or factors that may pose threats to public health or welfare or the environment.

---

---

### Prior Response Activities

---

---

PRP                       STATE                       FEDERAL  OTHER

**Brief Description:**

CTDEP had removed 15 partially buried drums containing PCB material before requesting EPA support.

---

---

### Priority for Site Investigation

---

---

High                       Medium                       Low                       None

**Comments:**

Concentrations of the PCB material located in the 15 drums were as high as 2,100ppm. There is a potential for additional buried drums at the site. As the site is actively being used as a cemetery, restricting access is difficult.

---

---

### Report Generation

---

---

**Originator:** Catherine Young

**Date:** 02 December, 2008

**Affiliation:** U.S. EPA

**Telephone:** (617) 918-1217

**TDD No.:** 01-08-11-0010

**Task No.:** 8





## REMOVAL SITE INVESTIGATION

---

---

### Physical Site Characteristics (Concluded)

---

---

Parameter	Quantities/Extent
( X ) Wells:	( X ) Drinking:
	( ) Monitoring:
( ) Other:	

---

---

### Physical Site Observations

---

---

Prior to its current use as a cemetery, the property was used as an airport hanger. The Site covers an area of approximately 52.42 acres, is relatively flat and is located within a residential area. Drums and containers have been identified in wooded areas of the property located at a rear section of the cemetery.

---

---

### Field Sampling and Analysis

---

---

Matrix/Analytical Parameter	Field Instrumentation				
	CGI/O <sub>2</sub>	RAD	PID	FID	Other

**Background Readings:**

**Air:**

**Soil:**

**Surface:**

**Water:**

**Tanks:**

**Drums:** CTDEP analytical data indicate that material located in the drums contain PCB's as high as 2,100 ppm

**Vats:**

**Lagoons:**

**Spillage:**

**Run Off:**

**Piles:**

**Sediments:**

**Groundwater:**

**Other:**

---

---

### Field Quality Control Procedures

---

---

( X ) SOP Followed                      ( ) Deviation From SOP

**Comments:**

## REMOVAL SITE INVESTIGATION

---

---

### Description of Sampling Conducted

---

---

CTDEP collected a composite sample of the material in the drums, four samples of the soil located beneath and at close proximity of the drums and samples from two drinking water wells located near the site.

---

---

### Analyses

---

---

Analytical Parameter	Media	Laboratory
<input checked="" type="checkbox"/> VOC	<input type="checkbox"/> AIR	<input type="checkbox"/> NERL
<input checked="" type="checkbox"/> PCB	<input checked="" type="checkbox"/> WATER	<input type="checkbox"/> CLP
<input checked="" type="checkbox"/> PESTICIDE	<input checked="" type="checkbox"/> SOIL	<input checked="" type="checkbox"/> PRIVATE
<input checked="" type="checkbox"/> METALS	<input checked="" type="checkbox"/> SOURCE	<input type="checkbox"/> SAS
<input type="checkbox"/> CYANIDE	<input type="checkbox"/> SEDIMENT	<input type="checkbox"/> SOW
<input checked="" type="checkbox"/> SVOC		<input type="checkbox"/> Field
<input type="checkbox"/> TOXICITY		
<input type="checkbox"/> DIOXIN		
<input checked="" type="checkbox"/> ASBESTOS		
<input type="checkbox"/> OTHER		

Analytical results:

---

---

### Receptors

---

---

#### Comments

Drinking Water  Private:  
 Municipal:  
 Groundwater:  
 Unrestricted Access:  
 Population in Proximity:  
 Sensitive Ecosystem:  
 Other:

---

---

### Additional Procedures for Site Determination

---

---

Biological Evaluation  ATSDR

## REMOVAL SITE INVESTIGATION

---

---

### Site Determination

---

---

Depending on further information, criteria that may be met by the site include 40 CFR 300.415 [b] [2], parts:

- i. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants.
- ii. Actual or potential contamination of drinking water supplies or sensitive ecosystems.
- iii. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.
- iv. High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.
- v. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
- vii. The availability of other appropriate federal or state response mechanisms to respond to the release.
- viii. Other situations or factors that may pose threats to public health or welfare or the environment.

---

---

### Report Generation

---

---

**Originator:** Catherine Young  
**Affiliation:** U.S. EPA  
**TDD No.:** 01-08-11-0010

**Date:** 02 December, 2008  
**Telephone:** (617) 918-1217  
**Task No.:** 8