U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Merrimack Industrial Metals - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: **POLREP #2**
Pollution Report #2
Merrimack Industrial Metals
01FM
Merrimack, NH

To:
From: Brent England, On-Scene Coordinator
Date: 7/9/2009
Reporting Period:

1. Introduction

1.1 Background

Site Number:	01FM	**Contract Number:**	EP-W-08-062
D.O. Number:		**Action Memo Date:**	3/24/2009
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	4/20/2009	**Start Date:**	4/20/2009
Demob Date:		**Completion Date:**	
CERCLIS ID:	NHD982745655	**RCRIS ID:**	NHD982745655
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Time-Critical Removal

1.1.2 Site Description

Merrimack Industrial Metals is a 5 acre site, designated as Lot 6-1 on Merrimack Tax Assessors Map 2B, and is the location of a former metals recycling facility that operated between 1963 and 1999 when Merrimack Industrial Metals (MIM) ceased operations. The site is located adjacent to Pennichuck Brook, a Class A Water Body and the main water supply source for the City of Nashua. The site also abuts and is located within the wellhead protection area for the Merrimack Village District (MVD) Municipal Supply Well #6 (Well#6).

A stockpiled soil pile was created during a cleanup attempt that occurred from October to December 1999, as part of negotiations for the sale of the property. The sale of the property never took place. The soil pile is located approximately 250 feet from Pennichuck Brook and 1200 feet from Well #6.

1.1.2.2 Description of Threat

Surface soils and waste piles are contaminated with lead up to 2,800 mg/kg and polychlorinated biphenyls up to 72 mg/kg. The applicable New Hampshire cleanup standards for surface soils in a commercial setting are 1000 mg/kg for lead and 25 mg/kg for polychlorinated biphenyls.

These contaminated surface soils are exposed and accessible to those who may enter the Site. Sparse vegetation in these areas may make these soils prone to migration via erosion.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA is conducting a fund-lead removal action to address conditions at the Site. Media attention is low, although local political attention is moderate due to the location of the well in proximity of the Site.

2.1.2 Response Actions to Date

There has been no use of the OSC warrant authority.

During the week of 11 May 2009, before the deployment of security fencing, EPA contractors researched the boundaries of the site for proper fence placement. Research through local tax maps revealed that the existing soil pile had been pushed, as part of Merrimack Industrial Metal's 1999 cleanup attempt, onto adjacent property owned by a railroad. EPA worked closely with the railroad to obtain access to their property. During the week of 29 June 2009, access was granted to the railroad property.

On 13 July 2009, excavation of the soil pile off railroad property was completed. Soil was stockpiled on MIM property and is currently going through a soil stabilization process before disposal.

On 21 July 2009, during instillation of silt fence, a metal object was discovered that was believed to be an unexploded military ordinance (UXO). Notifications included the state and local police, local fire, and the state police bomb squad. All necessary precautions were taken during the removal of the UXO. After determining by X-ray that the UXO was inert, state police bomb squad removed the item for off-site destruction. After this discovery, there was an amendment to the site health and safety plan and engineering controls were put in place to continue excavation in a safe manner.

On the week of 27 July 2009, after consolidation of highly contaminated PCB soil, the first step of the stabilization process began with screening of stockpiled soil.

The stabilization of the stockpiled soil is ongoing.

2.1.4 Progress Metrics

Highly contaminated PCB soil (appx. 1700 cubic yards) has been stockpiled on site and is currently being stabilized (screened and mixed with 5% portland cement) before disposal.

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Specific removal activities will include the following:

-Conduct a site walk with the cleanup contractor;

-Provide Site security as needed;

-Remove and dispose of lead-acid batteries and pressurized cylinders and other small containers of hazardous substances that may be encountered conduct additional sampling as needed to define the hazardous substances present and the extent of contamination in surface soils and waste piles;

-Excavate and dispose of lead- and polychlorinated biphenyl-contaminated surface soils and waste piles;

-Cap in-place contaminated soils (if any) which may remain at depth or which cannot otherwise be safely excavated;

-Stage, and dispose off-site hazardous substances at EPA-approved disposal facilities;

-Backfill and grade excavated areas;

-Repair response-related damages.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

- Be sure to check for ticks during breaks and at the end of the day when doing field work.

- Remember to establish eye contact with equipment operators

- Be careful with mechanized handtools while clearing brush
- Wear all PPE properly
- Be cautious of exposed metals

2.6 Liaison Officer

2.7 Information Officer

3. Participating Entities

3.1 Unified Command
US EPA

3.2 Cooperating Agencies
NH DES

4. Personnel On Site

START- 1 Project Leader (with additional help as needed)
ERRS- 1 Removal Manager
- 1 Foreman
- 2 Laborer/Operator

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report
For additional information please refer to http://www.epaosc.net/MIM.

6.2 Reporting Schedule

7. Situational Reference Materials

No information available at this time.