U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Synergy Site - Removal Polrep
Initial Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: **POLREP #1**
Initial
Synergy Site

Claremont, NH
Latitude: 43.3744000 Longitude: -72.3375000

To:
From: Gary Lipson, On-Scene Coordinator
Date: 7/13/2015
Reporting Period: 06/23/2015 - 07/10/2015

1. Introduction

1.1 Background

Site Number:	01HA	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	8/8/2013
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	PRP	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/23/2015	**Start Date:**	4/13/2015
Demob Date:		**Completion Date:**	
CERCLIS ID:	NHN000105965	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

1.1.2.1 Location

The Former Synergy Site is adjacent to the north and eastern bank of the Sugar River near the center of the Town of Claremont on the western side of the intersection of North Street and State Route 11. The Lower Cul De Sac Place property has also been referred to in the past as 59 Broad Street. The approximate latitude and longitude is N 43º22'28" and W 72º20'15", respectively. The north, northeast and eastern edges of the Site border a steep rise up to North Street and the Sugar River borders the western edge. The southern portion is bordered by an asphalted Cul De Sac, which continues up to Broad Street. Residential and commercial buildings are on the far side of North and Broad Streets. A revitalized mill containing a hotel, restaurant, and various commercial enterprises are across the Sugar River to the west.

1.1.2.2 Description of Threat

This Site is the location of a defunct manufactured gas plant (MGP) which is heavily impacted by an oily waste product (coal tar). The product appears to be the residual from the historic manufactured gas process. Coal tar is a brown or black liquid, which smells of naphthalene and aromatic hydrocarbons and is among the by-products when coal is carbonized to make coke or gasified to make coal gas. Visual observation, field instrumentation, and laboratory data indicate that approximately two-thirds of the Site is impacted by coal tar. The oily product is perched on bedrock, is leaching into the adjacent Sugar River, and has been detected in numerous surface soil samples above state standards. Minimal disturbances of surface sediments in the river caused visible sheening. Constituents of the product include semi-volatile organic compounds (carcinogenic and non-carcinogenic polynuclear aromatic hydrocarbons [PAHs]) and to a lesser degree, volatile organics and inorganics.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

During the 2010 preliminary assessment/site inspection (PA/SI), soil core samples were collected in 10 locations throughout the property at varying depths from 0-9' below grade and two sediment samples were

collected at the river's edge at approximately 1' below grade. In all 12 locations, 1 or more PAHs were detected at levels higher than the New Hampshire Department of Environmental Services (NH DES) Method 1 S-2 Soil Standards. These standards apply to sites where exposure may occur to a receptor that comes in contact with the contaminated soils in a work environment or in a passive recreational setting. In many cases, the concentrations detected were an order of magnitude higher than the S-2 standards and in some cases, 2 orders of magnitude higher.

The Department of Health and Human Services (DHHS) has determined that benz[a]anthracene), benzo[b]fluoranthene, benzo[k]fluoranthene, benzo[a]pyrene, dibenz[a,h]anthracene, and indeno[1,2,3-c,d]pyrene are known animal carcinogens. The International Agency for Research on Cancer (IARC) has determined the following: benz[a]anthracene and benzo[a]pyrene are probably carcinogenic to humans; benzo[b]fluoranthene, benzo[k]fluoranthene, and indeno[1,2,3-c,d]pyrene are possibly carcinogenic to humans. EPA has determined that benz[a]anthracene, benzo[a]pyrene, benzo[b]fluoranthene, dibenz[a,h]anthracene, and indeno[1,2,3-c,d]pyrene are probable human carcinogens.

Other hazardous constituents that have not been determined by DHHS, IARC, or EPA to be carcinogenic, but also exceeded the NH DES Method 1 S-2 Soil Standards were fluorene, 2-methylnapthalene, naphthalene (PAHs); 1,2,4-trimethylbenzene, ethylbenzene (volatile organics); and arsenic and lead (inorganics).

All constituents identified above are listed in 40 CFR §302.4, table 302.4, CERCLA List of Hazardous Substances.

As previously mentioned, the Site is adjacent to the Sugar River. When samples were collected at the rivers' edge during the original PA/SI, a slight disturbance of shallow sediment resulted in a sheen to the water. During the second EPA assessment in 2012, divers were used to collect sediment and water samples and to help determine if the site was discharging groundwater (and accompanying coal tar) to the river or if the river was recharging to the site. While performing these tasks, a number of oily rainbow sheens and some free product (and accompanying odors) were seen emanating from the work areas. Slight disturbance of the sediment caused by either walking or probing appeared to have caused the release of coal tar that was perched on bedrock or settled into rock fissures. According to city officials, at times of low river flow such as late summer, coal tar can routinely be seen emanating from the river bed at the edge of the Site property. The river is classified by the State of New Hampshire as a class B waterway, considered to be fishable and swimmable. There are at least two water intakes (non potable) within 1 downstream mile.

Surface soil sampling (0-3") conducted in 2012 showed that state standards for PAHs were exceeded in 11 of 12 samples for a minimum of at least one constituent. A petrochemical odor of varying intensity is usually present throughout the site, depending on the time of day and year as well as temperature, wind conditions, and humidity.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Due to a long history of bankruptcies, acquisitions, and mergers, AmeriGas Propane, L.P. is the respondent for the Site (AmeriGas). Over the past few years, numerous discussions between EPA, AmeriGas, the City of Claremont and the New Hampshire Department of Environmental Services (NHDES) have led to a cost sharing approach via an Administrative Order on Consent (AOC). AmeriGas will conduct the removal action. The property in question will be deeded to the City of Claremont to be used at their discretion. The EPA and a consultant for AmeriGas will oversee the contractor conducting the work. The cost share involves EPA spending up to a bottom-line expenditure with AmeriGas responsible for any costs incurred above that amount. Due to the project's cost structuring and the ability of the private sector to conduct a cleanup without the extent of overhead costs borne by the government, AmeriGas is able to undertake a more extensive cleanup than what the government would have had the funds to complete.

Removal activities will include demolition of the above ground structures, in-situ stabilization of some deeper contaminated soils/sediment, removal of coal-tar saturated soils down to bedrock, removal of contaminated near-shore sediments along the Sugar River, temporary rerouting of a subsurface sewer pipe and replacement of a section of that pipe, and backfilling/landscaping of the property.

2.1.2 Response Actions to Date

In 2014, GEI, consultants for AmeriGas, began preparing work plans, site specifications, and health and safety plans for the EPA, NHDES, and the City of Claremont's review and comment. After a number of revisions, the plans were finalized and the work went out to bid. Enviro-Air Technologies, Inc. (EAT) was selected to conduct the tasks associated with the removal action. Additional samples of contaminated soil were collected and sent to a laboratory to refine the type and amount of reagent to be added/mixed for In-Situ Stabilization (ISS).

During the week of June 22, 2105, GEI and EAT mobilized to the site. Initial activities included clearing and grubbing site vegetation, and demolishing the above ground structures and removing the ensuing debris for proper disposal.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

On September 22, 2008, Titan Propane, LLC, a company EPA believed to be a site owner responded to an EPA Request for Access Letter. Titan failed to grant access and questioned their legal ownership of the

site based on a long history of mergers, acquisitions, and bankruptcies. On May 3, 2010 upon a second request, Titan granted access for the purpose of an EPA led PA/SI.

On September 30 and again on December 9, 2010, Notice of Potential Liability Letters and Invitations to Perform or Finance Proposed Cleanup Activities were sent to Titan Propane, LLC and Heritage Operating, LP. Both entities denied liability at the site, again citing the long history of mergers, acquisitions, and bankruptcies.

In January 2013, EPA determined that AmeriGas Propane, L.P., a company owned by UGI Corporation, was responsible for the site.
After researching the role of the City in historic site activities, EPA deemed that Claremont was not a responsible party.

AmeriGas agreed to conduct a removal action under an AOC. The result is a cost share settlement for the removal between AmeriGas and EPA. Upon completion of the removal, the property will be deeded to the City of Claremont.

2.2 Planning Section

2.2.1 Anticipated Activities

Once demolition and site clearing activities are completed, the bypass of the existing sewer line will begin. As the current line runs through and over known contamination that depending on the location will be either excavated or stabilized in place, the sewer line will be temporarily be re-routed and new manhole(s) will be constructed. When the area in question has been remediated, a new line will be installed to replace the approximately 100 year old clay pipe. In conjunction with this, the in-situ stabilization process will begin, targeting the deeper pockets of contaminated soil, located primarily in the north and northwest sections of the site.

This ISS work will be followed by dredging/excavating contaminated shoreline sediment. The sediment removal will be facilitated by the placement of a dam-like structure in the adjacent river, allowing the removal to occur in drier conditions.

Following that will be more standard excavation activities throughout the remaining areas of the site and subsequent backfill and re-grading.

Since the site is part of the Claremont Historic District and qualifies under the federal Historic Preservation Act, EPA has been working with the State Historic Preservation Office (SHPO) to document the historic nature of the site. This included full documentation of the site structures prior to their demolition, a report on the site history, and its history in context to the City of Claremont. EPA will also work with the SHPO and city to leave a lasting monument at the site that will depict the contribution that the original MGP made to the City and its well documented textile history.

2.2.1.1 Planned Response Activities

Work on both the sewer bypass line and in-situ stabilization is scheduled to begin during the week of July 13.

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

GEI, the consultant overseeing AET for the PRP, has a full-time safety officer dedicated to this site. In addition, when the On-Scene Coordinator (OSC) is present, he also serves as a site safety officer.

There is a site safety meeting held every morning by the safety officer and includes all site personnel. Upcoming activities are highlighted, potential activities and their hazards are discussed, and safety concerns are reiterated.

2.5.2 Liaison Officer

The EPA OSC and the GEI construction manager serve as the liaison officers by communicating and coordinating with the PRPs, the City of Claremont, and the DES.

2.5.3 Information Officer

EPA has an assigned Community Involvement Coordinator (CIC) dedicated to this site. She has and will be assisting with fact sheets and press releases, meeting with city officials, and coordinating activities with AmeriGas and city outreach personnel.

3. Participating Entities

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

7. Situational Reference Materials

No information available at this time.