

**United States Environmental Protection Agency**  
**Region I**  
**POLLUTION REPORT**

**Date:** Friday, September 28, 2007

**From:** Dan Wainberg

**Subject:** Initiation of Action

2 Court Street

2 Court Street, Nashua, NH

Latitude: 42.7629000

Longitude: -71.4650000

|                          |              |                            |                |
|--------------------------|--------------|----------------------------|----------------|
| <b>POLREP No.:</b>       | 1            | <b>Site #:</b>             | 01EC           |
| <b>Reporting Period:</b> |              | <b>D.O. #:</b>             | 0069           |
| <b>Start Date:</b>       | 9/11/2007    | <b>Response Authority:</b> | CERCLA         |
| <b>Mob Date:</b>         | 9/11/2007    | <b>Response Type:</b>      | Time-Critical  |
| <b>Demob Date:</b>       |              | <b>NPL Status:</b>         | Non NPL        |
| <b>Completion Date:</b>  |              | <b>Incident Category:</b>  | Removal Action |
| <b>CERCLIS ID #:</b>     | NHN000105723 | <b>Contract #</b>          | 68-W-03-037    |
| <b>RCRIS ID #:</b>       |              |                            |                |

**Site Description**

In the summer of 2006, the City of Nashua (the City), in coordination with New Hampshire Department of Environmental Services (NHDES), requested that EPA Region 1 Emergency Planning & Response Branch evaluate seven city-owned properties to determine whether surface soils contained asbestos that posed a public health threat. On 25 July 2006, OSC Wainberg met with city officials and NHDES representative Mark Ledgard to conduct a preliminary assessment (PA) of the seven properties. During the week of 2 October 2006, the OSC and EPA contractors completed a Removal Program Preliminary Assessment/Site Investigation (PA/SI), which included collecting soil samples at the properties of concern. Of the seven properties, OSC Wainberg recommended a time-critical removal action at the 2 Court Street property, which contains the city-operated Public Library, in a Closure Memorandum dated August 3, 2007.

The Site is located in a high density urban area abutting the Nashua River. The area of concern at this property is a grassy area used by area residents as a walk-through down to the river and for recreational activities. According to 2000 census data, Nashua has an approximate population of 86,605.

Location details are:

- 2 Court Street, Nashua, Hillsborough County, New Hampshire, 03060; and
- North 42.7629° latitude, west 71.4650° longitude.

The Site is bordered to the:

- North by a steep bank sloping down to the Nashua River;
- East by woods and residential properties;
- West by the Court St. and commercial properties; and
- South by commercial properties

The Site setting and features consist of the following:

- The area of concern is approximately 0.5 acres;
- The property is owned and operated by the City and consists of the library building, a paved public parking lot, and a relatively flat, grassy area north of the parking lot (area of concern);
- The City has installed fencing and signs around the area of concern to prevent access;
- The City purchased the property from the US General Services Administration (GSA) in 1965; and
- It is believed that asbestos-containing material (ACM) was brought to this property at some point as free fill.

On 28 August 2007 an Action Memorandum was approved authorizing a removal action at the 2 Court Street Site to address the public health threat posed by the asbestos in surface soils.

### **Current Activities**

On 11 September 2007, OSC McKeown, EPA Emergency Rapid Response Services (ERRS) contractor representatives (a Removal Manager and an engineer), an EPA Superfund Technical Assistance and Response Team (START) contractor representative, and a City of Nashua representative mobilized to conduct the initial Site walk to discuss logistics, timeline, and specifications for the installation of a cap over the area of concern. Additionally, at the Site walk it was agreed that the ERRS contractor, prior to ERRS commencing work to install the cap, would provide an arborist to assess the health of the apple trees that are located in the cap area.

On 18 September, the ERRS RM and OSC Wainberg conducted a bid walk with NH licensed asbestos contractors who would potentially provide personnel for heavy equipment operation and cap installation.

Week of 24 September:

- ERRS mobilized equipment and supplies;
- The ERRS subcontractor installed temporary chain-link fence between the parking lot and the area of concern to secure the staging and cap installation areas;
- The ERRS subcontractor cleared vegetation along the northern fence line;
- The ERRS subcontractor felled a dead pine tree located in the area requiring a cap;
- The START contractor conducted air sampling and particulate monitoring;
- ERRS watered and misted work areas to eliminate airborne emissions of ACM;
- The ERRS subcontractor initiated soil excavation activities to secure the edge of geo-tech fabric under the soil cap;
- The ERRS subcontractor placed the asbestos contaminated soil in lined and sealed roll-off containers; and
- EPA sent out a press release to local media outlets and a flyer describing the removal activities was placed in the Nashua Public Library.

### **Next Steps**

- Continue with cap installation; and
- Commence the shipping of asbestos contaminated soil to the asbestos cell of the Nashua City Landfill.

### **Key Issues**

Particulate air monitoring and air sampling for asbestos fibers will be conducted during all intrusive activities.

[response.epa.gov/CourtStreet](http://response.epa.gov/CourtStreet)