



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

DATE: January 12, 2021

SUBJ: Site Investigation Closure Memorandum
McGoldrick Paper Company Site
54-54A Canal Street
Hinsdale, NH 03451

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

THRU: William Lovely, Chief
Emergency Response and Removal Section II, EPRB, SEMD

TO: McGoldrick Paper Company Site File

In accordance with the National Contingency Plan (NCP) § 300.410, a Removal Site Evaluation, consisting of a Preliminary Assessment and Site Investigation (PA/SI), has been undertaken at the McGoldrick Paper Company Site ("Site") in Hinsdale, NH. The findings of the Removal Site Evaluation have been evaluated under the criteria set forth in the NCP § 300.415, the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) § 104(a) and (b), 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 a draft inventory of Oil and/or Hazardous Materials (OHMs) conducted by Ransom Consulting, Inc., dated August 28, 2018.
 - ii. Review of the ASTM Phase I Environmental Assessment Report prepared by Ransom Consulting, Inc., dated September 19, 2018.
 - iii. Review of the Phase II Environmental Assessment Report prepared by

Ransom Consulting, Inc., dated December 10, 2019.

- iv. The Site Investigation on August 17-18, 2020.
 - v. Generating a PA/SI report by EPA's contractor, titled "*Removal Program Preliminary Assessment/Site Investigation Report for the McGoldrick Paper Company Site Hinsdale Cheshire County New Hampshire 17 and 18 August 2020*" dated November 2020.
 - vi. The Site Review Meeting on November 25, 2020, where site investigation results were shared with the Site Case Team and Emergency Planning & Response Branch (EPRB) management, and the decision to conduct a Removal Action was supported.
- 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>
Volatile Organic Compounds (VOCs)	Liquids (55-gal drums/totes)
Semi-volatile Organic Compounds (SVOCs)	Liquids (55-gal drums/totes)
Caustics (pH>12)	Liquids (55-gal drums)
Acids (pH <2)	Liquids (55-gal drums)

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 the NCP § 300.410(f) for the following reason(s).

- There is no release.
- The source is neither a "vessel" nor a "facility" as defined in the NCP § 300.5.
- 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 the NCP § 300.415(b)(2), 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.
 - (X) 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.
 - () Threat of fire or explosion.
 - () 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 or the environment.
- b. The absence of the conditions specified in section 4.a., above, indicate that a Removal Action under the NCP § 300.415 is necessary.

Current site conditions do warrant a Federal Response by the Emergency Planning and Response Branch (EPRB) of EPA Region 1. The data from the Preliminary Assessment/Site Investigation (PA/SI) documented the presence of VOCs, SVOCs, caustics, and acids stored in various types of containers, including 55-gal drums and 275-gal totes, that have been abandoned at this Site.

After reviewing the results of the site investigation, a Site Review Meeting was held on November 25, 2020. At this meeting the findings from the site investigation were presented; a decision to move forward with a Removal Action was proposed, and that decision was supported by the Site Case Team and EPRB management.

For further information regarding the PA/SI, refer to the *“Removal Program Preliminary Assessment/Site Investigation Report for the McGoldrick Paper Co Site Hinsdale Cheshire County New Hampshire 17 and 18 August 2020”* dated November 2020.

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 the NCP § 300.410(e)(1), the OSC shall determine whether a release governed by CWA § 311(c)(1), as amended by OPA § 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.

cc: William Lovely, Chief, Emergency Response and Removal Section II, SEMD (w/o attachments)
Meghan Cassidy, Chief, Remedial Policy, Contracts & Site Assessment Section, SEMD (w/o attachments)
Patti Ludwig, Superfund Federal Facilities & Information Management Section, SEMD (w/o attachments)
Melinda Bubier, NHDES
Jill Collins, Town Administrator, Hinsdale, NH

Encl: PA/SI Report