

SITE: Fletcher's
BREAK: 2.8 FBI
OTHER: FOIA Exempt 1C

Privacy Act (Access - Addresses)
A redacted address is in
Removal Address III AR
(1984)



INDOOR DUST SAMPLING SUMMARY
[REDACTED]
**FLETCHER'S PAINT WORKS AND STORAGE
FACILITY SUPERFUND SITE
MILFORD, NEW HAMPSHIRE
November 15, 1994**

Prepared for:

U.S. Environmental Protection Agency
Emergency Planning and Response Branch
60 Westview Street
Lexington, Massachusetts 01273

CONTRACT NO. 68-WO-0036

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Prepared by:

ROY F. WESTON, INC.
Technical Assistance Team
Region I

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I. INTRODUCTION

The following is a summary of the U.S. Environmental Protection Agency (EPA), Region I, Emergency Planning and Response Branch's (EPRB) and Waste Management Division's (WMD) actions conducted at the Fletchers Paint Works Site (the site). From a period of October 25 to November 15, 1994, members of the Roy F. Weston, Inc., Technical assistance Team (TAT), along with representatives of EPA conducted preliminary home surveys and subsequently indoor dust sampling at a total of eight residences in the vicinity of the site.

Indoor dust sampling was conducted based on the possibility that polychlorinated biphenyls (PCBs) previously detected in residential soil could have been transported into the residences on the soles of shoes and on the bottom of pets' feet. As a result, EPA concluded that a potential existed for PCBs to be present in the indoor house dust of these residences. In an effort to determine whether this potential indoor PCB dust contamination existed and posed a threat to the residents, EPA and TAT performed indoor dust sampling at the eight residences.

II. SITE BACKGROUND

The site is located in Milford, Hillsborough County, New Hampshire (see Figure 1 - Site Location Map). The former manufacturing plant and retail store is located at 39 Elm Street (Route 101A) (the Elm Street site), while the former pigment storage property is located on Mill Street (the Mill Street site). The company operated at these two locations from the early 1950's until 1991. Paints and stains were manufactured, stored, distributed, and sold on site. Prior to its use for paint manufacturing, the Elm Street site was the location of an industrial facility that manufactured baked enamels and lacquers. Both sites are currently included on the EPA's National Priority List (NPL), as the Fletcher's Paint Works and Storage Facility Superfund Site.

Elm Street Site

The Elm Street site is approximately 1.6 acres and consists of one retail outlet and manufacturing building and a gravel parking area. It is bordered by a historical cemetery to the east, the Souhegan River to the north and northeast, Keyes Drive to the west and Elm Street to the south. The surrounding area is a mix of residential and commercial properties. To the west of Keyes Drive is Keyes Field, a municipal recreation area. The Keyes municipal water supply is located at Keyes Field and previously supplied water to the town. As a result of an initial EPA removal preliminary assessment/site investigation (PA/SI) conducted in 1987, EPA identified 863 drums containing a variety of polyaromatic compounds and paint pigments on the site. These drums were subsequently removed from the Elm Street site by EPA in 1988.

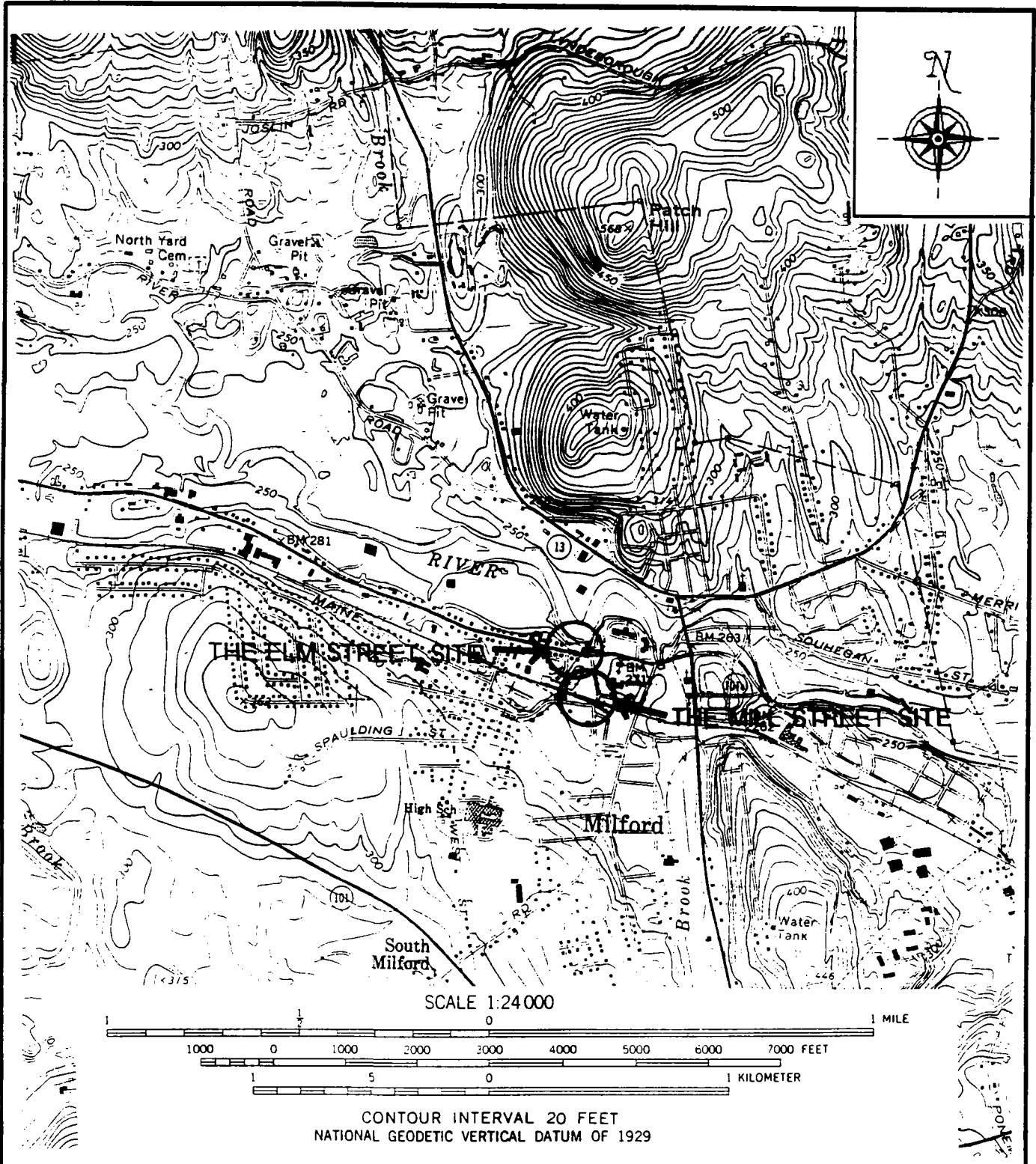


FIGURE 1

**SITE LOCATION MAP
FLETCHER PAINT WORKS AND STORAGE FACILITY
ELM STREET AND MILL STREET SITES
MILFORD, NEW HAMPSHIRE**
SOURCE: USGS 7.5 MINUTE SERIES TOPOGRAPHIC MAP,
MILFORD, NH QUADRANGLE 1985.



DRAWN BY RILEY	DATE 10/94	PCS # 1042
APPROVED BY <i>[Signature]</i>	DATE 7/16	TDD # 01-9410-42

The unpaved parking area at the Elm Street site was also found to contain high levels of PCBs in the soil. EPA placed an 8-inch gravel cap over the parking area prior to the drum removal project.

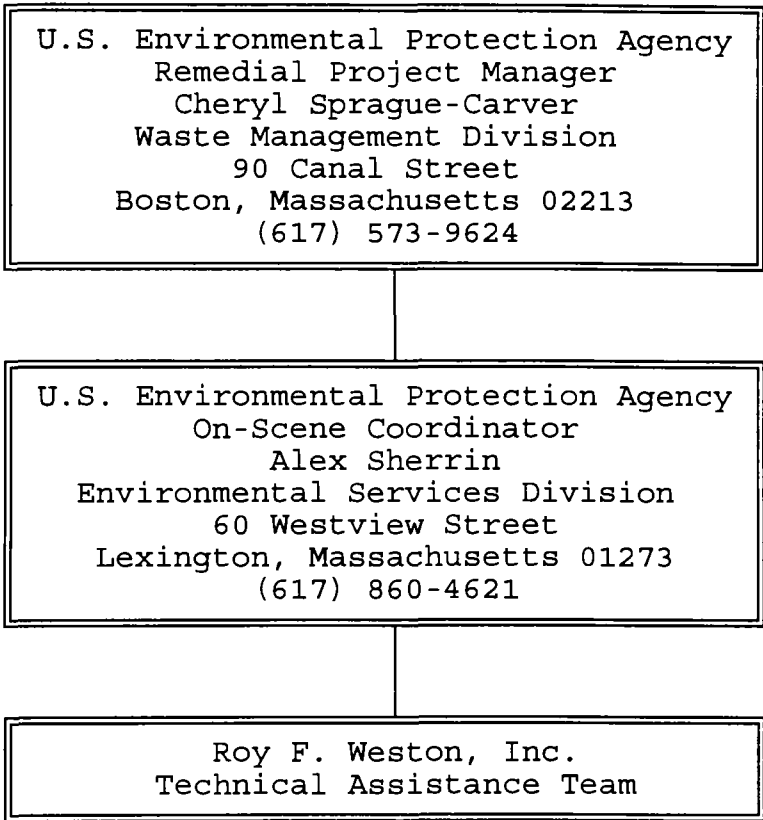
Mill Street Site

The Mill Street site is approximately 0.2 acres. It is bordered by a Boston & Maine Railroad right-of-way to the north, Cottage Street to the east, Mill Street to the south, and the Draper Energy property to the west. In addition, the Hampshire Paper Company is located approximately 300 feet to the northwest. The surrounding area is a mix of commercial and residential properties. As a result of the initial EPA PA/SI conducted in 1987, EPA discovered several hundred bags and dozens of fiberboard drums containing paint pigments in the storage building located on the Mill Street site at that time. EPA also determined that the Mill Street site contained high levels of PCBs in the soil, as well as in core samples collected from the former wooden storage building. In 1988, EPA placed an 8-inch gravel cap over the portions of the site not covered by the storage building. The bags and fiberboard drums of paint pigments were not removed at this time due to the fact that the manufacturing plant was still in operation and the paint pigments were considered process chemicals.

In 1992, at the request of the local fire department, EPA conducted a site visit and discovered that bags and fiberboard drums of paint pigments were still present on site. These items were not removed during the previous removal activities due to the fact that the manufacturing plant was still in operation and the paint pigments were considered process chemicals. In 1993, EPA demolished the wooden storage building and removed all of the remaining bags and fiberboard drums.

Between November 1991 to December 1993, EPA's WMD collected soil samples from residential properties surrounding both of the sites and identified levels of total PCB contamination ranging from not detected (ND) to 42 parts per million (ppm). In addition, The State of New Hampshire Department of Environmental Services conducted surface soil sampling at residential properties for the EPA during this period. Sample results identified levels of total PCB concentrations up to 86 ppm at one of the properties. Based on the possibility that the PCBs detected in residential soil could have been transported into the residences on the soles of shoes and on the bottom of pets' feet, EPA concluded that the potential existed for PCBs to be present in the indoor house dust of these residences. In September 1994, in an effort to determine whether this potential indoor PCB dust contamination existed and posed a threat to the residents, the WMD requested that the EPA EPRB perform an indoor dust survey at eight residences in the proximity of both the Elm Street and Mill Street sites.

III. PROJECT ORGANIZATION



IV. SITE CHRONOLOGY

October 25, 1994

1430 EPA Remedial Project Manager (RPM) Cheryl Sprague-Carver, EPA On-Scene Coordinator (OSC) Alex Sherrin and TAT member Dawn Riley arrived at the [redacted] residence to conduct a home survey, determine the total area of the residence, select sample station locations, and draw the existing floor plan (see Appendix A - Home Survey Documentation).

1630 On-site activities were completed; EPA and TAT departed the residence.

November 15, 1994

1400 RPM Sprague, OSC Sherrin, and TAT member Riley arrived at [redacted] to perform dust sampling activities. TAT member Riley collected vacuum dust samples (see Appendix B - Sample Location Map) and photodocumented the residence (see Appendix C - Photodocumentation Log).

1500 Upon completion of sampling activities and Chain-of-Custody Documentation (see Appendix D - Chain-of-Custody Documentation); EPA and TAT personnel departed the residence.

V. PRELIMINARY FINDINGS

Vacuum sample analytical data indicate that no PCB-contaminated household dust above EPA's PCB cleanup level of 10 ug/100cm² existed at the sample location.

See Appendix E, Table 2 Summary of Vacuum Dust PCB Results for details.

It should be noted that in the future, EPA is planning to perform a human health risk assessment on the residential exposure to the household dust.

Appendix A

Home Survey Documentation

HOME SURVEY

SITE ID# [REDACTED]

Appointment Date & Time: 10/25/94 Interviewer(s): [Signature]

Do you own, rent, or lease your home?

Homeowner

Alternate Contact

Name:

[REDACTED]

Name:

Address:

[REDACTED]

Phone:

(H) _____

(W) _____

Phone:

(H) [REDACTED]

(W) _____

1) Number of Occupants

Names

Ages

Adults

2

[REDACTED]

[REDACTED]

Children

Pets

2

cat + dog

Do other children frequently visit your residence? How many?

2) How long have you lived at your current residence?

1 1/2

3) What year was this house built? (oldest part)

2250 yrs old.

4) What type of home do you live in? (ie: wood, brick, mobile home)

wood + brick

5) Has any part of your house been repainted, sanded, chemically or heat stripped, or otherwise refinished within the last year?

2 1/2 years ago they painted the room + refinished woodwork

HOME SURVEY

SITE ID# [REDACTED]

6) Does your child attend a daycare or preschool or babysitter (secondary residence)?

7) How many hours a day on the average do the children play outdoors?

NA
NA

8A) Caregiver Summary Data:

INDUSTRIES	PRIMARY CAREGIVER		OTHER PARENT		OTHER ADULT	
	Y/N	BEGIN/END DATES	Y/N	BEGIN/END DATES	Y/N	BEGIN/END DATES
painting	<i>Y</i>	<i>for past 30 years inside + outside at houses.</i>				
building demolition	<i>N</i>					
oil refinery	<i>N</i>					
sand blasting	<i>N</i>					
auto body work	<i>N</i>					
chemical plant	<i>N</i>					

Electronics
work with for the last 25 years

8B) Have you or anyone living at your residence worked at the Fletcher's Paint Works in the past?

8C) Have you or anyone living at your residence spent anytime, past or present, at the Fletcher's Paint Works Site?

Y?
Y?

HOME SURVEY

SITE ID# [REDACTED]

9) Number of Floors 2

Is there a basement present? [] Yes [] No

Is it a living space? [] Yes [] No

Approximate Dimensions 11 x 11

Other: _____

Is there an attic present? [] Yes [] No

Is it a living space? [] Yes [] No

Approximate Dimensions 11 x 11

Other: _____

10) List areas where Asbestos Containing Materials (ACMs) may be/are present and describe their condition:

No

11) Describe type and general operation of air heating/cooling system:

radiant forced hot water

12) Which entrance to the house is used most often?

BI front door

still being redone - no
 - still being redone, vacancies

HOME SURVEY

SITE ID# [REDACTED]

13) Room Layout and Dimensions

- Sketch plan of room layout for each floor on attached sheet
- List names, dimensions, type of foot traffic and frequency of cleaning for each room:

<u>Room Name</u>	<u>Dimensions (ft. x ft.)</u>	<u>Type of Floor Surface (ie, wood, carpeted, tiled, etc.)</u>
<u>Entry-ways</u>		
E1	4 x 9 1/2	linoleum + throw rug
E2		
E3		
Living room	17 x 15	rug, lin. 1980
Kitchen	19 1/2 x 15	linoleum

Children's Bedrooms

the C1	11 x 12	carpet
laughlin C2	12 x 11	carpet in 1980
C3		
T V room	15 x 9	26 -
Bathroom	5 1/2 x 4	linoleum
TV room 2	13 x 14 1/2	wood + carpet
hallway	48 x 3	
3	10 x 14	WOOD CARPET
C3	169 x 15	WOOD CARPET

HOME SURVEY

SITE ID# [REDACTED]

To the best of my knowledge, the information contained in this document is true.

Print Name(s)

[REDACTED]

Resident(s) Signature

Date

HOME SURVEY

SITE ID# [REDACTED]



FLEETER PAINT

SHEET 1 of 3

CLIENT/SUBJECT EPA/HAT

W.O. NO. _____

TASK DESCRIPTION [REDACTED]

TASK NO. _____

First Floor

PREPARED BY D. P. [REDACTED]

DEPT _____

DATE _____

APPROVED BY _____

MATH CHECK BY _____

DEPT _____

DATE _____

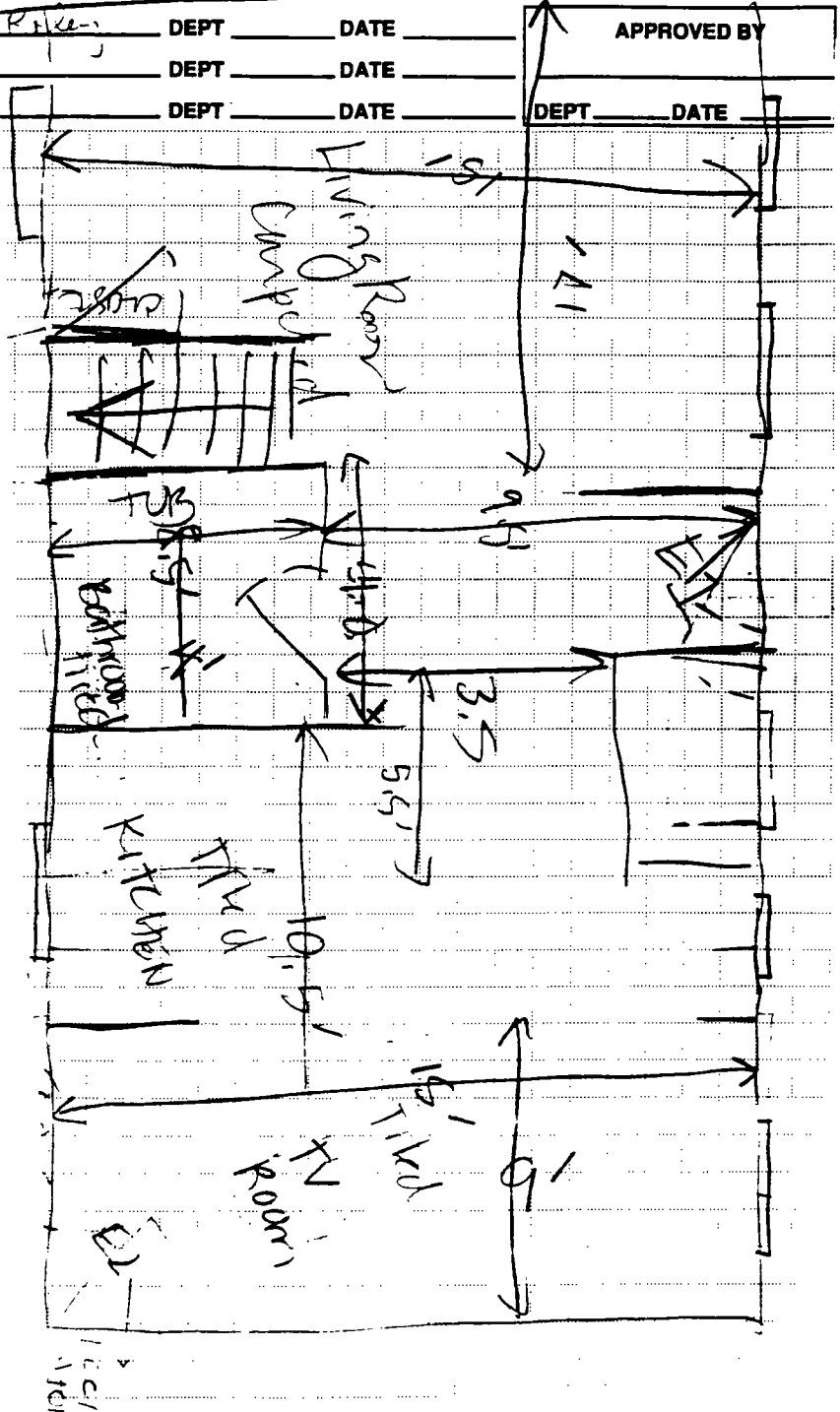
METHOD REV. BY _____

DEPT _____

DATE _____

DEPT _____

DATE _____



Vxx = Vacuum Sample

xx = Consecutive Numbering Convention to Differentiate Sample Station Locations

HOME SURVEY

SITE ID# [REDACTED]



FLETCHERS PARK

SHEET 2 of 3

Second Floor

CLIENT/SUBJECT EPA/TAT W.O. NO. _____

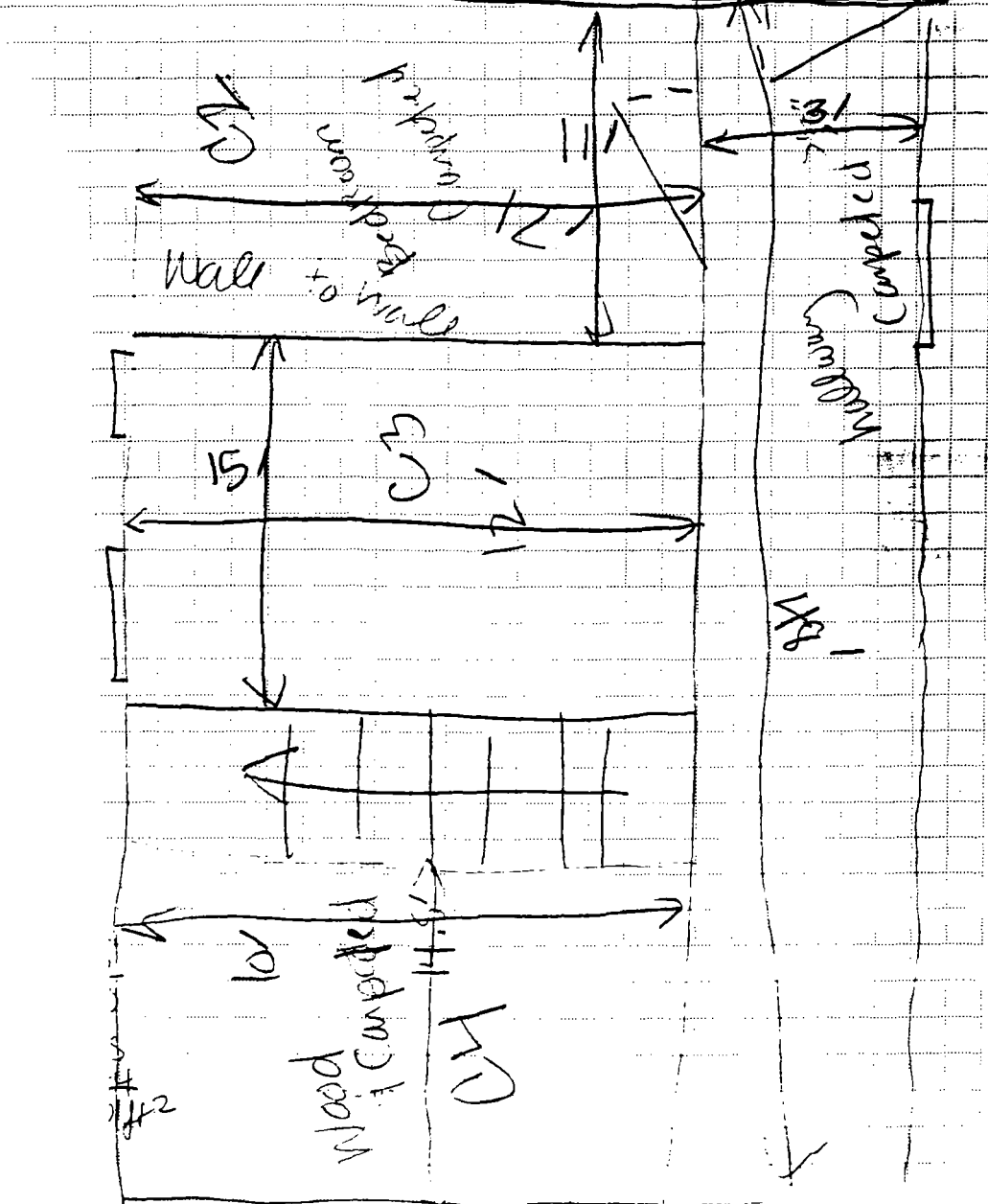
TASK DESCRIPTION [REDACTED] TASK NO. _____

PREPARED BY D. Riley DEPT _____ DATE _____

MATH CHECK BY _____ DEPT _____ DATE _____

METHOD REV. BY _____ DEPT _____ DATE _____

APPROVED BY	
DEPT _____	DATE _____



Vxx = Vacuum Sample

xx = Consecutive Numbering Convention to Differentiate Sample Station Locations

FLOOR PLAN SKETCH

Second Floor (CONT'D)



SHEET 2 of 3

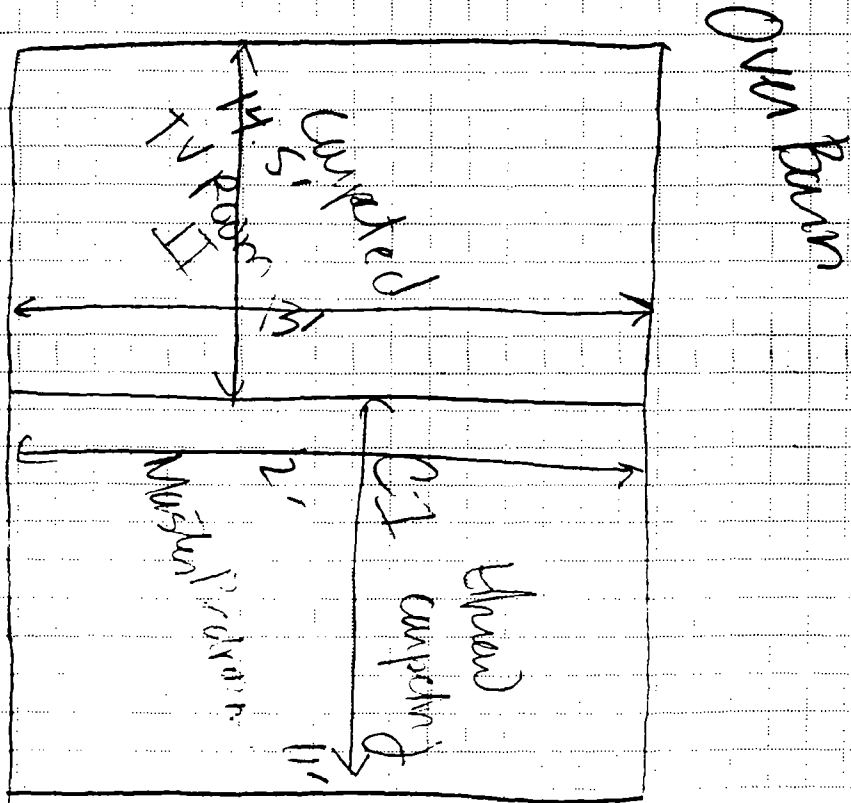
CLIENT/SUBJECT EPA/ITAT W.O. NO. _____

TASK DESCRIPTION [REDACTED] KNO. _____

PREPARED BY _____ DEPT _____ DATE _____ APPROVED BY _____

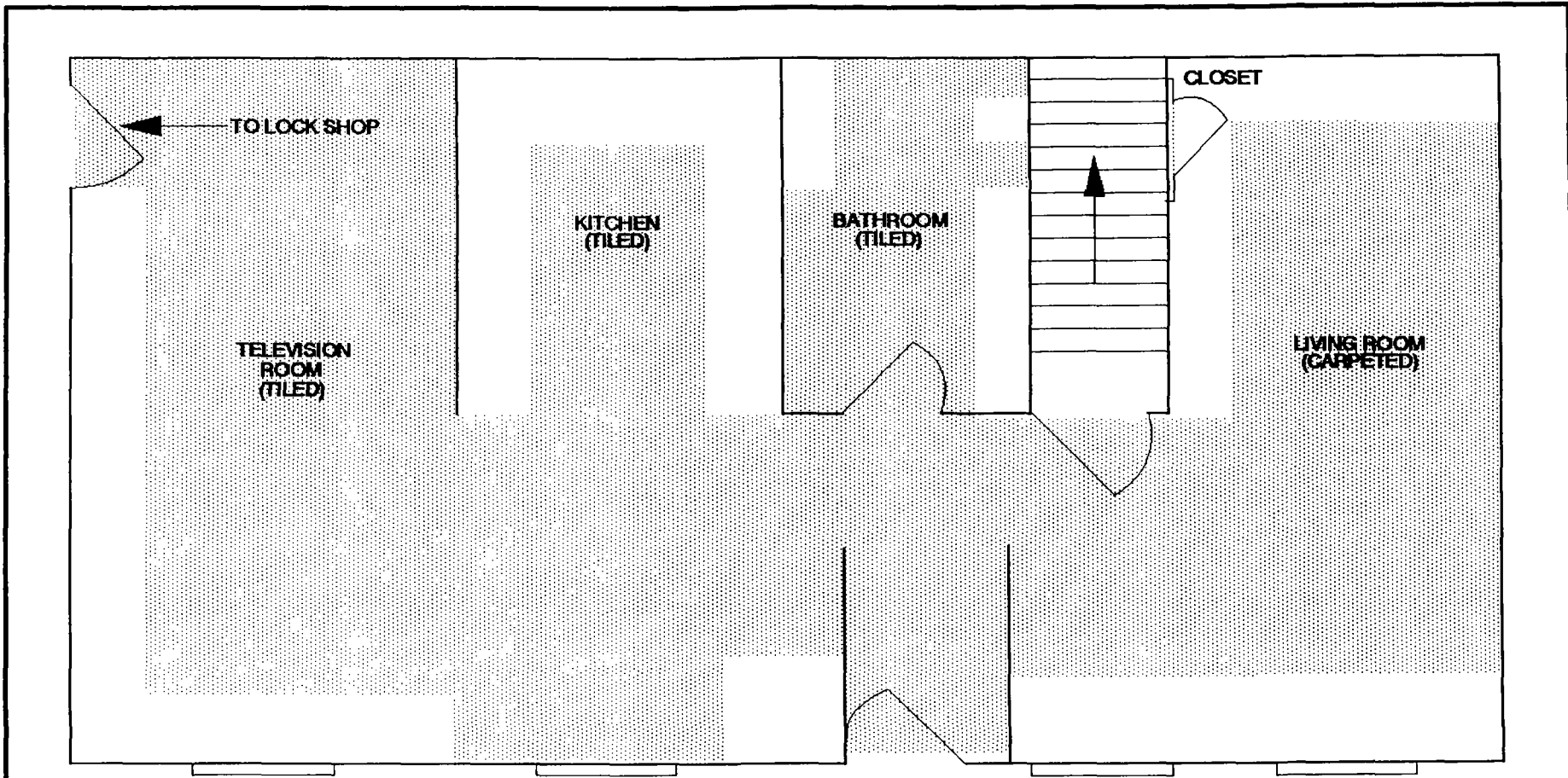
MATH CHECK BY _____ DEPT _____ DATE _____

METHOD REV. BY _____ DEPT _____ DATE _____ DEPT _____ DATE _____



Vxx = Vacuum Sample
 xx = Consecutive Numbering Convention to Differentiate Sample Station Locations

Appendix B
Sample Location Map





LEGEND
 = AREA SAMPLED

FIGURE 2
SAMPLE LOCATION MAP
 [REDACTED]
 INDOOR DUST SURVEY
 FLETCHER'S PAINT WORKS AND
 STORAGE FACILITY SUPERFUND SITE
 MILFORD, NEW HAMPSHIRE

NOT TO SCALE



DRAWN BY RILEY	DATE 11/94	PCS # 1042
APPROVED BY 	DATE 2/95	TDD # 01-94-1042

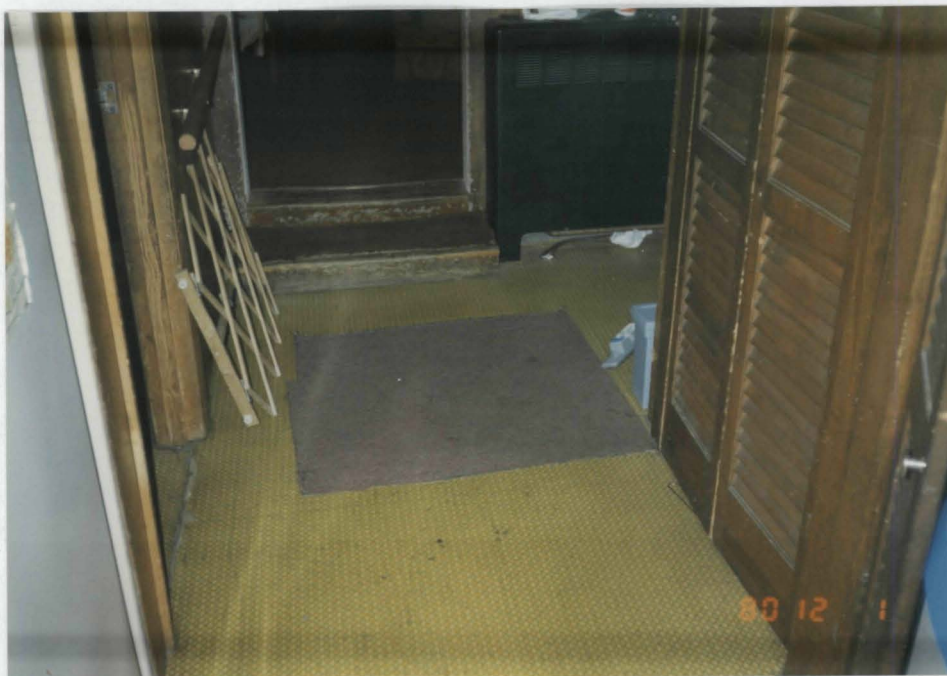
Appendix C
Photodocumentation Log

PHOTOGRAPHY LOG SHEET

Fletcher's Paint Works and Storage Facility Superfund Site
Milford, New Hampshire



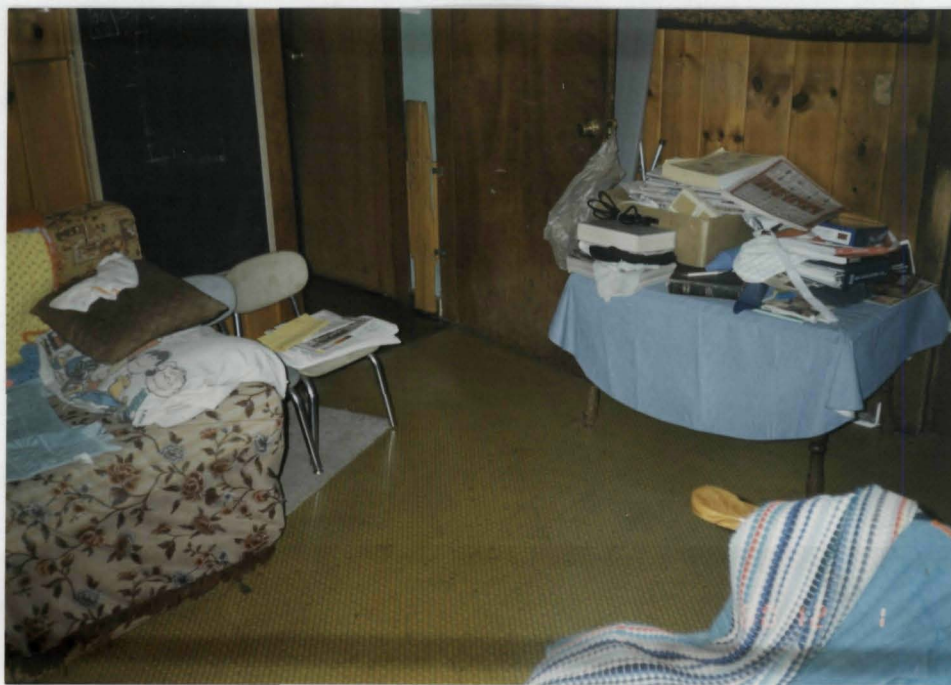
SCENE: Kitchen area
FRAME NUMBER: 26 **DATE:** 11/15/94 **TIME:** 1440 **SKY CONDITION:** NA
PHOTO BY: D. Riley **WITNESS(ES):** OSC Sherrin & RPM Sprague
CAMERA: Minolta **SETTING:** Automatic **FILM TYPE:** 35 mm **FILM ROLL:** 02120



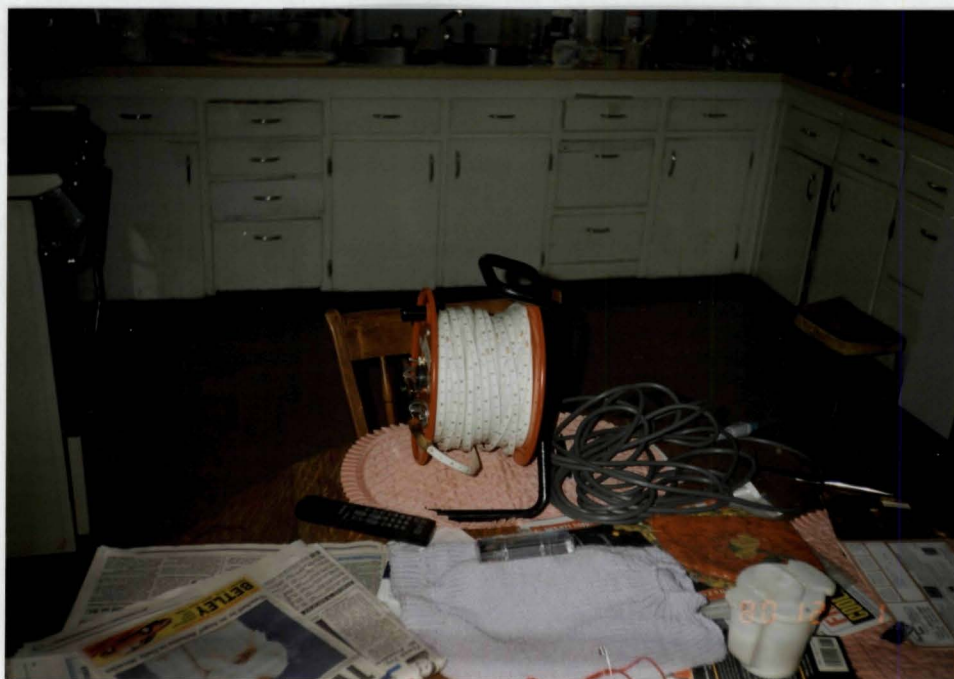
SCENE: Front Entry
FRAME NUMBER: 27 **DATE:** 11/15/94 **TIME:** 1440 **SKY CONDITION:** NA
PHOTO BY: D. Riley **WITNESS(ES):** OSC Sherrin & RPM Sprague
CAMERA: Minolta **SETTING:** Automatic **FILM TYPE:** 35 mm **FILM ROLL:** 02120

PHOTOGRAPHY LOG SHEET

Fletcher's Paint Works and Storage Facility Superfund Site
Milford, New Hampshire



SCENE: Den Area
FRAME NUMBER: 24 **DATE:** 11/15/94 **TIME:** 1435 **SKY CONDITION:** NA
PHOTO BY: D. Riley **WITNESS(ES):** OSC Sherrin & RPM Sprague
CAMERA: Minolta **SETTING:** Automatic **FILM TYPE:** 35 mm **FILM ROLL:** 02120



SCENE: Kitchen Area
FRAME NUMBER: 25 **DATE:** 11/15/94 **TIME:** 1435 **SKY CONDITION:** NA
PHOTO BY: D. Riley **WITNESS(ES):** OSC Sherrin & RPM Sprague
CAMERA: Minolta **SETTING:** Automatic **FILM TYPE:** 35 mm **FILM ROLL:** 02120

PHOTOGRAPHY LOG SHEET

Fletcher's Paint Works and Storage Facility Superfund Site
Milford, New Hampshire



SCENE: Kitchen Area

FRAME NUMBER: 22 **DATE:** 11/15/94 **TIME:** 1430 **SKY CONDITION:** NA

PHOTO BY: D. Riley **WITNESS(ES):** OSC Sherrin & RPM Sprague

CAMERA: Minolta **SETTING:** Automatic **FILM TYPE:** 35 mm **FILM ROLL:** 02120



SCENE: Den Area

FRAME NUMBER: 23 **DATE:** 11/15/94 **TIME:** 1430 **SKY CONDITION:** NA

PHOTO BY: D. Riley **WITNESS(ES):** OSC Sherrin & RPM Sprague

CAMERA: Minolta **SETTING:** Automatic **FILM TYPE:** 35 mm **FILM ROLL:** 02120

PHOTOGRAPHY LOG SHEET

Fletcher's Paint Works and Storage Facility Superfund Site
Milford, New Hampshire



SCENE: Living Room

FRAME NUMBER: 28 **DATE:** 11/15/94 **TIME:** 1440 **SKY CONDITION:** NA

PHOTO BY: D. Riley **WITNESS(ES):** OSC Sherrin & RPM Sprague

CAMERA: Minolta **SETTING:** Automatic **FILM TYPE:** 35 mm **FILM ROLL:** 02120

Appendix D

Chain-of-Custody Documentation

Appendix E
Sample Results

TABLE 1

**Concentrations of PCBs in Vacuum Dust
Reported as Dust Concentrations in ug/kg
November 15, 1994.**

Sample Number	CS7
Aroclor 1016	UJ
Aroclor 1221	UJ
Aroclor 1232	UJ
Aroclor 1242	UJ
Aroclor 1248	140 J
Aroclor 1254	300 J
Aroclor 1260	UJ
Total PCBs	440 J

Notes:

Ug/kg = microgram per kilogram.

J = The associated numerical value is an estimated quantity because the reported concentrations were less than the required detection limits or quality control criteria were not met.

UJ = The material was analyzed but not detected. The reported detection limit is estimated because all quality control criteria were not met.

TABLE 2

**Summary of Vacuum Dust PCB Results
Reported as Loading Rates
November 15, 1994**



Sample Number	CS7
Total Area of the Living Space (ft²)	619.5
Area Sampled (ft²)	411.07
Sample Weight (g)	111.1
Total PCBs (ug/100cm²)	0.012

Notes:

ft² = square feet

g = grams

ug/100cm² = micrograms per 100 square centimeters

CONVERSION CALCULATIONS

These conversion calculations are used to convert ug/kg reported from the laboratory to ug/100cm² in order to compare the sample results to the technology based cleanup objective of 10 ug/100cm² for PCBs.

$$\text{L.R.} = \text{sample result ug/kg} \times \frac{1 \text{ kg}}{1,000 \text{ g}} \times \frac{\text{sample weight in g}}{\text{ft}^2 \text{ area sampled}} \times \frac{\text{ft}^2}{929.03 \text{ cm}^2} \times 100$$

L.R. = Contaminant Loading Rate in ug/100cm²

Notes:

- 1) ug/100cm² = micrograms per 100 square centimeters
- 2) ug = micrograms
- 3) kg = kilograms
- 4) g = grams
- 5) ft² = square feet
- 6) cm² = square centimeters