



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100 (OSRR 02-2)
BOSTON, MASSACHUSETTS 02109-3912

DATE: July 15, 2013

SUBJ: Site Investigation Closure Memorandum
Creative Packaging and Paper Site
261 Clover Street
Worcester, MA

FROM: Allen K. Jarrell, On-Scene Coordinator *Allen K Jarrell*
Emergency Response and Removal Section I, EPRB, OSRR

THRU: David McIntyre, Chief *DMcI*
Emergency Response and Removal Section I, EPRB, OSRR

TO: Creative Packaging and Paper Site File

In accordance with section 300.410 of the National Contingency Plan (NCP), a Removal Site Evaluation, consisting of a Preliminary Assessment and Site Investigation (PA/SI), has been undertaken at the Creative Packaging and Paper Site ("Site") in Worcester, Massachusetts. The findings of the Removal Site Evaluation have been evaluated under the criteria set forth in section 300.415 of the NCP, section 104(a) and (b) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 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 identify conditions that exist which warrant a Federal response and 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. The PA and site reconnaissance of the Site on February 27, 2013.
 - ii. The SI conducted on March 18-20, 2013.
 - iii. Review of the June 20131 PA/SI report by EPA's contractor, titled "Preliminary Assessment/Site Investigation Report for the Creative Packaging and Paper Site, Worcester, Worcester County, MA."
 - 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.



Hazardous Substances or Pollutants or Contaminants

Media

Ferric Sulfate, Sodium Hydroxide, Processing Chemicals

Vats/Drums/Containers

Asbestos containing material

Insulation

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 section 300.410(f) of the NCP for the following reason(s).

- There is no release.
- The source is neither a "vessel" nor a "facility" as defined in section 300.5 of the NCP.
- 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 Section 300.415(b)(2) of the NCP, 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.
 - Hazardous substances or pollutants or contaminants in drums, barrels, vats, tanks, 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.
 - 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 of the United States or the environment.
- b. The presence of the conditions specified in Section 4.a., above, indicate that a Removal Action under section 300.415 of the NCP is warranted. Unknown waste products and solvents/stains/lacquers containing VOCs and other paint-related hazardous materials are in drums and containers throughout this Site. In addition, asbestos-containing materials were confirmed throughout the facility. The Site is unsecured due to people repeatedly breaking in doors and windows and there are signs of trespassing throughout.
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 section 300.410(e)(1) of the NCP, the OSC shall determine whether a release governed by CWA section 311(c)(1), as amended by OPA section 4201(a), has occurred.
- There is a release, or potential threat of release, as governed by the CWA as amended by OPA.
 - 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: David McIntyre, Chief, Emergency Response and Removal Section I, OSRR
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