



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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Clarification Memorandum to File

DATE: April 18, 2023

FROM: Gerardo Millan-Ramos  
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Superfund and Emergency Management Division

TO: File

RE: Auburn Road Landfill Superfund Site  
Clarification of Site Boundary & Operable Units in Five Year Reviews

The purpose of this memorandum is to clarify the following two subject matters in the recent Seventh Five Year Review (FYR) Report: 1) the Site boundary definition to more accurately reflect site data and 2) identify the Site Operable Units.

1. Site boundary

In the recent Seventh Five Year Review (FYR) Report completed on September 12, 2022, the Site boundary was described as the portion of the NHDES Groundwater Management Zone (GMZ) that abuts the property owned by Mr. Al Simard. Figure 1 of the 7<sup>th</sup> FYR Report shows this approximate Site boundary with a black solid line (Refer to figure attached). However, the historical data for all monitoring wells reveals that various monitoring wells within Mr. Simard's property have shown arsenic concentrations that exceed both the EPA cleanup level (10 µg/L) and the NHDES Ambient Groundwater Quality Standard (5 µg/L). The data review performed as part of the 7<sup>th</sup> FYR showed that from 2017 to 2022, arsenic exceeded the cleanup goal (10 µg/L) at 25 monitoring locations including 15 overburden wells, 7 bedrock wells and 3 piezometers, located throughout the entire GMZ. Detected concentrations ranged from 5 µg/L in bedrock monitoring wells MW-1A and MW-108A to 234 µg/L in overburden monitoring well NUS-1-2, which lies in Mr. Simard's property. Please refer to Figure D-4 and Figure D-5 of the 7<sup>th</sup> FYR Report showing the 2021 arsenic concentrations in overburden and bedrock groundwater.

Groundwater contamination remains generally contained within the GMZ, except for well MW-210. Well MW-210 is located immediately outside and downgradient from the GMZ boundary on the north side of Cohas Brook (refer to Figure 2 of the 7<sup>th</sup> FYR Report). This well consists of an overburden/bedrock couplet. At this couplet's bedrock well (MW-210A) arsenic was detected in fall 2021 at a concentration of 10 µg/L, which is equal to the site cleanup goal. Previous results from this well have ranged from non-detect (less than 5 µg/L) to 11 µg/L (observed in 2018).

As a result of the above data, it is necessary to extend the Site boundary to include the entire area within the GMZ including the portion of Mr. Simard's property inside the GMZ.

2. Site Operable Units

In the 1989 Record of Decision (ROD) and the 1999 Consent Decree (CD), the Auburn Road Landfill Site Operable Units (OU) are defined as: OU1 - installation of a waterline for a municipal water supply, OU2 - the groundwater (management of migration), and OU3 – the former landfills (source control). This nomenclature of OUs was used in the 7<sup>th</sup> FYR.

However, the nomenclature in the 5<sup>th</sup> and 6<sup>th</sup> FYR Reports, and the July 2009 Explanation of Significant Differences (ESD) incorrectly reference OU2 - the cap over the former landfills (source control), and OU3- the groundwater (management of migration).

By this memorandum, the 5<sup>th</sup> and 6<sup>th</sup> FYR Reports, and the 2009 ESD OU designations are clarified to reflect the OU designation listed in the 1989 ROD and the 1999 CD.

