TOWN OF MILFORD, NH

PUBLIC HEARING

Fletcher's Paint Superfund Site

One Union Square

Milford, NH 03055

Wednesday, September 12, 2012

7:05 p.m.

Hearing Officer:

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Project Manager:

Cheryl Sprague, EPA

Panel:

Robin Mongeon, NHDES
Dick Pease, NHDES
Ellen Iorio, US Army Corps of Engineers

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MS. SPRAGUE: All right. Thank you all for coming here tonight. We are here for the Fletcher's Paint Superfund Site. We're here for a proposed plan introduction by the Environmental Protection Agency.

We're going to start off tonight with a quick introduction. My name is Cheryl Sprague. I work with the Environmental Protection Agency. I am the remedial project manager for the Fletcher's Paint Superfund Site.

With me tonight is my boss, chief of the New Hampshire/Rhode Island Superfund Section, Mike Jasinski; Robin Mongeon, my co-partner for New Hampshire DES; her boss, Dick Pease, from New Hampshire DES; Ellen Iorio, she works for the Corps of Engineers for the EPA, and I will point out Elaine.

Because we are in the middle of a public comment period, we are recording. We are required to record all of the comments that I make and the questions that are happening tonight.

At the end of the public meeting, which is the part where I describe the plan, we're going to

have a public hearing, between which we'll answer any questions you might have on the technical nature of what I presented.

At the public hearing -- Mike will describe it -- but essentially it's your comments that you can orally give. A lot of times people will e-mail or they will fax it in or they will mail it to us; but we give all people the opportunity to speak into the mic and directly give oral comment. When the public hearing is closed, we can finish answering any additional questions you may have.

So, with that, tonight's presentation is fairly quick. This is a small piece of the Fletcher's Paint Superfund Site. So it's a fairly quick site description, history and status of the Fletcher's Paint properties, which includes Operable Unit 1, which we will describe the cleanup plan and the schedule as it stands now. Then I'll describe Operable Unit 2, which is the Souhegan River portion of the Fletcher's Paint site, and then I'll finish with tonight's presentation on the proposed plan and what we are proposing for Keyes field groundwater.

Fletcher's Paint, if you've been around

town, you know that for 20 years you may have heard about Fletcher's Paint. If you didn't know this, we started when the Keyes well became contaminated in 1984.

Keyes well was a municipal supply well to roughly 10 percent of Milford's population from 1972 until 1984. Low levels of contamination were found in 1984. The state and EAP came onboard, and what they did is they thought -- they figured out that Fletcher's was the most likely source.

So, EPA came onboard, we removed hundreds of drums from the property in 1987 and again in 1993; and at that point in 1989 EPA became eligible to put the Fletcher's Superfund Site on the national priorities list; and once it's on the list, it becomes eligible for cleanup under Superfund.

So Fletcher's Paint, I know you've driven by likely on Elm Street, it's actually multiple parts. And what we've done over the last 20 years is clean it up and address it in different components. We call them operable units.

So just as an overview -- if I can get this to work -- Fletcher's Paint property, there's one

located on Elm Street; one located on Mill Street. We call those Operable Unit 1. Those are the source areas. Those contain the higher level of chemicals within the soils and groundwater.

Operable Unit 2 includes Keyes field and the Souhegan site. Those are areas that received contamination that may have migrated off of Fletcher's Paint. So that's how we divided up the operable units.

So Operable Unit 1 is the Elm Street property. It used to house the former Fletcher's Paint manufacturing facility. It's roughly 1.6 acres, and it's a complex site in that it's bordered by the Souhegan River, a cemetery, a highway and a playground, which kind of constrains a little site.

Over on Mill Street it gets even smaller. It's a 0.2 acre site abutting a former coal yard, and at the back of it is an active railroad.

Operable Unit 2 is the Keyes field, which is roughly 19 acres; and it's the groundwater under Keyes field which is of the concern, not Keyes field the soils, just the groundwater underneath and the roughly half mile of the Souhegan River, which

starts about at the Fletcher's Paint property on Elm Street down to the Goldman Dam.

So, if you've been around town for a long time, this building right here in the middle -- if I can get this to work -- right here in the middle is the former Fletcher's Paint manufacturing facility. This building was torn down by the EPA in 1990 -- in 2001 when all of their tenants had moved out and it fell into disarray.

This is a picture -- again, as I said, Keyes became contaminated in 1984; and this is what the site would have looked like in 1987 when we came onboard. Drums were stored typically in the back of the Elm Street facility along Keyes Drive and at Mill Street.

This is the Mill Street facility; and, again, we have -- in red you see it, there's the former coal yard which has burned down, the transfer weigh station for the coal yard; and this property housed two small sheds; and within those sheds the Fletcher's Paint housed their pigments and other chemicals; and this was removed by the EPA and demolished and sent offsite in 1993.

Little bit of history if you're not familiar with it. The Fletchers have operated in Milford from 1949 to about 1991 when they closed their business. They sold residential paints and stains. They made stains for traffic paint, but they also had a few other businesses where Mr. Fletcher would act as a middleman or make other components or other chemicals.

From the 1950's to the 1960's a waste product called scrap pyranol was brought to the Fletcher site. This came from the General Electric manufacturing facilities in New York. Scrap pyranol is a mixture essentially of polychlorinated biphenyls, trichloroethylene, TCE, and trichlorobenzene.

And in 1984 after many years of operation of Fletcher's the well was found contaminated.

Now, there's no direct, you know, link that we have to it other than knowing that the Fletchers had operated. The state has done investigations, and it wasn't just Fletcher's that was reviewed. Every property around the Keyes well was looked at at the time. However, with Fletcher's being

so close and the number of drums in the operation, it became evident.

So, EPA came onboard. We did remedial investigations from 1991 until 1998. What we found at the end was that the soils at the Fletcher's Elm Street piece of the site is heavily contaminated with PCBs. PCBs are found at depths, sometimes down to 26 feet or in some cases bedrock. Depending on where bedrock is.

The groundwater was contaminated with PCBs, TCE and trichlorobenzene. We also have gasoline products because there are two gasoline stations between our two properties, and those have leaked over time, so there is some petroleum product mixed in with our contamination.

And in the end what we found was that there's unacceptable human health risk from exposure from direct contact and ingestion with these materials.

So EPA had selected a remedy in 1998, and in 2001 EPA issued an order to General Electric to perform the cleanup at the site. So under that order GE's been doing the predesign investigations. They

have done preliminary designs, which a lot of it include how to cap the site.

And in the meantime there was a look at changing it from the 1998 remedy, which was an onsite thermal treatment to excavation and offsite disposal.

So in all those years all of those designs worked on looking at the difference between the two of them. The EPA did change the remedy to offsite disposal in 2009.

Recently EPA had approved the draft final design in September 2011, and this following spring GE has been conducting constructability testing; and with that they've been taking soil samples on Elm Street to kind of finalize the design placement for the support walls. And they've been doing pump tests at Mill Street where they lower the water table to see -- you know, doing it at a short period so that when they actually get to the final construction, we understand how the water could be lowered, what the rates would be and how to treat the groundwater.

Those are wrapping up at this point, but GE will continue on. Because we're going to delay the

design somewhat from September 2011 until November of 2012, GE's agreed to go out and perform some remedial action work to get the ball started; and those include putting in an alternative parking area at Keyes field. Eventually, when the construction happens, Keyes Drive will be dug up.

So GE will be constructing this fall a parking area within Keyes Park. They'll also be removing some telephone poles and relocating them, and we do have one resident whose parking area is impacted and we'll be addressing that.

And what we're hoping to do -- we're still finalizing the plans on that. So EPA will be holding another meeting in October where we discuss the details of that action that's going to happen this fall.

The basic elements of the remedy that's happening at the OU1 soils portion of the site -- and I'm going to point out why this is important. We're excavating and setting offsite the contaminated soils, and there's going to be containment for the lesser contaminated soil.

But also part of that remedy,

groundwater has to meet New Hampshire groundwater -- drinking water standards; and to do that we've had to require that an establishment of a groundwater management zone be established around the groundwater that's contaminated at the site; and within the zone, groundwater gets monitored and the use of the groundwater would be restricted. So that's already a component of the OU1 remedy.

Groundwater at Mill Street is primarily the source area for the contamination for the groundwater as it migrates to the Souhegan River.

The groundwater at Mill Street is heavily contaminated, and it's contaminated with compounds that don't readily migrate. They don't readily degrade. So, as a result, they're going to be here for a long time.

So there's groundwater management zone that's going to require monitoring and restrictions on use will likely be around for about a hundred years.

So I'm going to move on and describe what else we've done at the site, which is the OU2 Souhegan River.

So while we were in design on the OU1

properties, General Electric and GE and their consultant, Arcadis, came out; and they actually sampled sediments and biota within the river portion from the Fletcher's Paint site down to the Goldman Dam. That report is on EPA's website. I believe it's listed in here.

Anytime EPA gets a final report and it's a significant report, we're publishing it on our website. So you have access to it from anywhere. You don't have to go to the library or any other place to get it. So that report, the Souhegan River report, is on the website.

EPA took the data from that report, and we developed a baseline human health and ecological risk assessment. So what that means is we took the sediment data and the fish data and we calculated a risk assessment and found that the risk from the Souhegan River, from the sediment within the Souhegan River, are from the ingestion of recreational caught fish. The fish bioaccumulate the PCBs that are in the sediment. They hold onto the PCBs. So, if someone were to eat the fish for 30 years, there would be a risk.

There's also a lesser risk from direct contact with PCBs, and I'll point out -- if my pincher would work -- I'll point out this little blue area right here -- right here is the Fletcher's Paint site. So essentially the PCBs have migrated into the sediments, and they're pretty much staying right around here. There's very little -- low levels all the way down to the dam, but primarily this is where the PCBs are located adjacent to the Fletcher's Paint site.

And this is where the direct contact would happen. This is where we studied it because, again, this is where we know this is a swimming spot for kids in the town.

So EPA took the data. We know there's a risk now from sediments in the river, and we looked at doing a feasible study; and, as we progressed in the feasibility study, one of the things that became unclear was how much sediment was contaminated down by the Goldman Dam.

So recently we've undertaken a study to collect samples. This happens to be the grid we used, and we're collecting samples and we're waiting for the

results. When we get the data back from this sediment sampling, we're going to complete the feasibility study and we'll be presenting a proposed plan for the cleanup of the Souhegan sediments in 2013.

Okay. So now we'll talk about what we're here tonight to talk about, which is the Keyes field, Keyes field groundwater.

Outlined in red here is the area that we call the Keyes field. One of the things we -- I put this slide in to show you that -- the star happens to represent the Keyes well, which is located at the back of the Keyes field.

Groundwater flow, when the pump was on -- of course, this is a well that's about 60 feet deep. When it's on, it's pumping at a great rate. So it's going to influence groundwater flow around it. So the groundwater flow when the pump was on -- when the pump was on was flowing towards the well and not towards the river at that point.

When the pump is off, however, groundwater flows toward the Souhegan River. Souhegan River is a discharge point, so you no longer have flows from the Fletcher's Paint site towards the Keyes

well; but you do have flows generally crossing Keyes field toward and discharging to the river. And that's helpful because it allows us to be able to segregate where the OU1 groundwater contamination is flowing to.

Keyes field sampling. So in 1994 we have contamination discovered in the Keyes well. From the late 1980s both the State of New Hampshire and the US Geological Survey did a series of pump tests to determine where the influence of the pump might be -- the pumping might be -- to see where the contamination was that got to the Keyes well.

And during the 1990s we performed the remedial investigation, and one of the things we were looking at as we put wells into the Keyes field was where does the Fletcher's contamination end?

So, as we put these small wells in, one of the things we discovered was a lot of petroleum floating on top of the groundwater in the Keyes field. So we sampled the Keyes field groundwater and noticed that Xtramart did indeed have a leak and was producing, of course, this product of petroleum across the Keyes field.

So the New Hampshire DES has been

working with the Xtramart facility since then to address this petroleum release.

EPA at the time didn't do any further sampling. Under the EPA's law that we follow, which is called CERCLA, we're not allowed to address petroleum releases. So we kind of put a hiatus on for ten years letting that clean itself through those regulations.

We came back in 2007 and again in 2009, and we sampled the wells in the Keyes field. What we found was that there was no longer any site-related contamination in the Keyes field. There was no longer petroleum as it was when we found it and -- and that was great. Most of it was below federal and state drinking water standards.

So we took the data we had and we did a risk assessment, and what we found is that there's no current risk to anybody because there's no current users. All of the water at the Keyes field, whether it be for drinking, irrigation, or anything else, is used by a municipal source.

So we looked at future risk scenarios, and the future risk scenarios we looked at was a park

worker, you know, irrigation swimming, a park user who might swim in water taken from groundwater or drink from a bubbler taken from the groundwater and a future resident; and the future resident means that we're assuming that the Keyes well was turned back on and used as a municipal source.

And that's significant because when you use it as an municipal source and you characterize it for a resident, you're drinking two liters of water a day, you're showering. There's much greater exposure and you calculate it over 30 years. So, when we did our calculations, we still have the no current risk because there's no current user.

And just to define risk, since that seems to be a word that's hard to define. You already have, each one of us a, roughly, one-in-three chance of developing cancer. That's our excess cancer risk. EPA has an acceptable risk range which allows for one in 10,000 up to -- or one in a million up to one in 10,000 extra cancer across a lifetime as a result of exposure to the chemicals at one of our Superfund sites.

So, when we did our calculation, we

develop a number; and what we saw was that for the park worker and the park user, there was acceptable risk. There was nothing exceeding EPA's risk range from those two scenarios.

For the future resident, which again is 30 years, every day, there was a risk of two times ten to the minus four or two in 10,000 excess cancer risk in a lifetime.

But the other thing we noticed when we looked at it is that upgradient of the Keyes field, we have contamination from Fletcher's Paint and we have the Xtramart, which has petroleum in it. So really we decided that there was a third risk scenario, whereas if you put the Keyes well on, you're not just being exposed to what's currently in the groundwater but what could migrate into the Keyes field; and that is actually a much more significant risk is what could migrate into the Keyes field.

So just to describe the contaminants that led to the two times ten to the minus four risk, the first one is arsenic. Arsenic is a naturally occurring compound in groundwater in New Hampshire. We found it in one well at 11 micrograms per liter.

The state standard is 10 micrograms per liter. And when you calculate a risk for 11 micrograms per liter, it gives you 1.9 times ten to the minus four.

So you can see it really occupies most of the risk that was present in the groundwater.

The second compound was methyl tertiary butyl ether or MTBE. It's a petroleum additive. We found it in one well at 15 micrograms per liter. The state standard is 13 per drinking water.

There was MTBE up at the Xtramart facility. When you look back at the data over the last few years, it's migrated on. It's a very mobile contaminate. It's clearly gone and moved across Keyes field discharging to the river, and just we're getting whatever's on the tail end of. There was no entity detected up at the Xtramart station recently.

The future residential risk, we did not calculate a risk for what was upgradient because we already have risk assessments done for OU1, but there was such significant concentrations in groundwater that exceed federal and state drinking water standards, that clearly if these waters were to move into Keyes field and Keyes field -- the water under

Keyes field was used as a municipal source, they would also exceed drinking water standards and pose a risk.

Normally after EPA gets a risk assessment and finds a risk, we move on to do a feasible study; how do we address the cleanup? Well, in this case we had a naturally occurring compound and a petroleum additive, which is not addressable under CERCLA.

So EPA has the option of doing a no-further-action plan under three different scenarios. So we chose to present a no-further-action plan because there's no current users, so there's no current risk, because the future risk is primarily related to offsite contamination migrating into the Keyes field should the Keyes field be used again as a municipal supply, and because the OU1 response action that we selected in 1998 and in 2009 already eliminated the need for further remedial action.

The groundwater management zone that has been established or proposed for OU1 already addresses the potential risk to human health from exposure to these contaminates, it already requires that the wells be restricted from use within that groundwater zone,

and it requires the monitoring until drinking water standards are met.

So we believe we can propose no further action necessary at Keyes field groundwater because we've already documented that we've already got protection at Keyes field groundwater.

And what you're seeing here in yellow -- if I can get this to work -- what you're seeing here in yellow is on the far east side or the right side of the screen is the area for OU1 groundwater. The contamination is essentially in this ballpark for the groundwater management zone. However, the groundwater management zone includes all of Keyes field.

Part of that is to prevent the migration of contaminates, part of it is to monitor for the edge of the OU1 contamination; but it already is in place proposed under OU1 and, therefore, there's no further action necessary.

EPA has to go through this process. We do have to document each and every piece that's listed as a piece of the Superfund site. So sometimes, you know, our job is to clean up, and sometimes our job is

to document the decisions made; and that's what we're here for tonight to do.

At this point we'd like to open up to see if there's any clarifying questions about the Keyes field groundwater proposal we have; and when we follow that, we'll open it for public hearing. And when the hearing is closed, if you have questions about any other piece of the Fletcher's Paint site, we'll take it then; but right now we'd like to address comments for the Keyes field groundwater.

Are you going to do the -- public hearing officer?

HEARING OFFICER: Any clarifying questions that you can ask Cheryl that she'd be more than willing to answer?

UNIDENTIFIED SPEAKER: There's a house on Mill Street sitting right beside --

UNIDENTIFIED SPEAKER: Excuse me. We're going to need to get individuals to use a microphone so the audience can hear, and we have a hand mic we can pass around.

MS. SPRAGUE: Thank you, Guy.

UNIDENTIFIED SPEAKER: Thank you.

There's a house on Mill Street right beside all of the cans of contaminated soil and whatever and a newly erected fence.

The house there had people living in it, and it was for sale for a short period of time. Was it safe for people to be living there?

MS. SPRAGUE: You're talking about the white house near the railroad?

UNIDENTIFIED SPEAKER: Yes.

MS. SPRAGUE: Yes. Actually, we know the owner. We're in conversations with him all the time.

Yes. The contamination at Mill Street -- this is not part of the groundwater piece -- but the contamination at Mill Street is not carried over to his property, and we've tested indoor air at the property, and it's been fine, and we're in constant contact with him.

UNIDENTIFIED SPEAKER: Okay. Thank you.

HEARING OFFICER: Is there another -- Mr. Clemens (phon), you have a question about the OU2 groundwater?

UNIDENTIFIED SPEAKER: Who's currently

responsible for the Keyes well and who makes the decision whether they turn it on again in the future?

MS. SPRAGUE: Currently responsible for the Keyes well or the Keyes field and the use of the Keyes well, I believe, is part of the town's potential use of groundwater. They would have to probably go through the state, you know, program to get it turned back on.

But my understanding -- and Robin can speak to -- she did a groundwater use and value determination came out, talked to Guy over here, and they determined that there was no future, you know, determination that they were going to use the Keyes well for future municipal supply.

So I think it's only an issue if it's going to get turned back on again to go through the process.

UNIDENTIFIED SPEAKER: I might clarify.

Here in Milford we have an elected set of water utility commissioners who oversee that activity, but they can only activate a well that meets a state and federal standard. So they would work in compliance with DES and federal in the event there was

ever desire to turn it back on. But since it doesn't meet standards, that pretty well closes that door.

HEARING OFFICER: Are there any other clarifying questions that you would like to ask Cheryl before we start the formal hearing where we won't be able to answer your questions?

That usually gets somebody up.

UNIDENTIFIED SPEAKER: You'd mentioned the Goldman Dam. As you know, there's another dam down the river as well. Does the presence or absence of those dams have any affect on this whatsoever? If the dams weren't there, would the change in flow of the river have any impact on the groundwater?

MS. SPRAGUE: No. Not that we've seen. It's still going to discharge to it. All the groundwater discharges from both sides to that part of the river.

Is there anything else?

HEARING OFFICER: Anything else before we start the formal hearing? Okay.

Oops. Sorry, sir. The microphone.

UNIDENTIFIED SPEAKER: I've been down there in that part of the river, and I haven't seen

any signs that said no fishing or no swimming. Is that something that should be there?

MS. SPRAGUE: We actually have done health consultations, and they have issued a -- it's not a warning to no fish because there's PCBs in the filet. So what there is, the State of New Hampshire worked with the US Fish and Wildlife Service, and what they have, I believe it came out in the early '90s was a recommendation that if you were to eat the fish, that if you -- because the PCBs want to be in the fat tissues of the fish, that you actually grill it and skin it, because now you're releasing some of the PCBs and you are exposing yourself to as little as possible.

Again, the risk that you see is from eating it for 30 years, eating so much per day; and that's how they developed the risk.

There's signs down at the river. They're hard to see because, of course, the water level has dropped and you've got vegetation now; but there is a snow fence essentially across the bank area and it says keep out. And I actually went up again when the river levels dropped, and you couldn't see

them. I actually went up on Friday night; we posted another no trespassing sign.

When we do see people in the river, we have -- our consultants are out here quite a bit -- as soon as I get notified on my cell phone that there's somebody in the river, we've called the town, and the town has called the Boys & Girls Clubs and made sure there's no children are out there.

We've talked with the Keyes field park rangers to make sure we're monitoring what's in there to see who's there, and we come out and we talk.

HEARING OFFICER: All right. Thank you, Cheryl. You can sit down for a second.

UNIDENTIFIED SPEAKER: Now, in that area there's supposed to be no swimming at all? Like, because I remember swimming that little rope swing area a lot when I was younger.

MS. SPRAGUE: Right. No. It's more of a qualitative risk. What it essentially means is when the PCBs have come into the river and they've settled, they've done it over time.

I mean, there's 26 feet of contamination up against the site. So what you're seeing is

essentially the PCBs coming in. So when you actually look at the profile of the contamination in the river, it's going from cleaner to dirtier as you go down.

So really what we're more concerned about is somebody's going to be swimming and they're going to move over 12 inches of sediment and actually get to something more contaminated. So it's a qualitative risk should there be enough exposure that they move the sediment and get to the deeper contamination.

So the surface is much less contaminated than it is at depth; and over time what you have is, you know, you have the natural attenuation where you have upgradient sediments coming in continuously that are clean and they're all depositing over. So, as time goes on, you're burying some of the contamination. In many areas it's well below two feet before you can even find contamination.

HEARING OFFICER: All right.

Good evening. My name's Mike Jasinski. I'm chief of New Hampshire/Rhode Island Superfund section at EPA in Boston; and I'll be the hearing officer for the next portion of tonight's proceedings.

As you heard this evening, we're here to talk about the OU2 groundwater Keyes field proposed plan that EPA has in front of you that is out for public comment that started in the end of August and will end September 24th.

As Cheryl indicated, we are in the formal hearing session now. We will take any additional comments that weren't asked earlier, but we will not respond to those at this point in time.

We are recording every comment, every statement, every question; and we will consider those comments/questions as they pertain to the OU2 groundwater proposed plan.

When we go back to Boston, we get the transcript, we finish the public comment period, we will evaluate all those comments, we will respond to all those comments in what we call the response to the summary. Once the response to the summary is prepared, we will also make a final decision on what we will do for the OU2 groundwater Keyes field and will document that in what we call a record of decision.

And, as Cheryl indicated, we've written

at least one and amended it once at least in the last couple of years. Those documents will be available this fall, it will be available online, they'll be available across the street at the library and at EPA's Boston offices for your review if you wish to look at them; but, as I indicated, we will respond to all comments tonight as they pertain to the OU2 groundwater in a document we call the response to the summary.

So with that, if I could ask if you have any comments on tonight's proposal, would you please come up to the microphone, state your name, speak loudly, please, try to spell your name if you need to, and try to give us an indication of how you relate to this Fletcher's Paint Superfund Site.

So with that, is there any formal public comments on the OU2 groundwater proposal that we have in front of us this evening?

(Pause)

HEARING OFFICER: Okay. I think you've asked all your questions, and Cheryl's responded to all of those. I will formally close the hearing this evening. I thank you for coming out this evening, and

have a good night; and if you wish to ask any questions about anything else, we'll be here to answer those for the next half hour.

Thank you very much. Have a good evening.

(Hearing concluded at 7:36 p.m.)

C E R T I F I C A T E

I, Elaine J. Ritsema, a Certified Court Reporter and Notary Public of the State of New Hampshire, do hereby certify that the foregoing is a true and accurate transcription to the best of my ability, taken at the place and on the date hereinbefore set forth.

I further certify that I am neither attorney, nor counsel for, nor related to or employed by any of the parties to the action in which this testimony was taken, and further that I am not a relative or employee of any attorney or counsel employed in this case, nor am I financially interested in this action.

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Elaine J. Ritsema, CCR, RPR
NH Certified Court Reporter
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