

U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) - REGION I  
RCRA CORRECTIVE ACTION PROGRAM

**STATEMENT OF BASIS**

**FOR A**

**CORRECTIVE ACTION COMPLETION DETERMINATION**

FOR

**WATERS CORPORATION**

34 MAPLE STREET AND 5 TECHNOLOGY DRIVE

MILFORD, MASSACHUSETTS

EPA ID No. MAD001047968

AUGUST, 2013

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Based upon investigation activities conducted at the Waters Corporation Facility located at 34 Maple Street and 5 Technology Drive in Milford, Massachusetts, EPA is announcing its Completion Determination remedy proposal that Corrective Action obligations under the Hazardous and Solid Waste Amendments of the Resource Conservation and Recovery Act are "Complete without Controls."

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**INTRODUCTION**

The U.S. Environmental Protection Agency - Region I (hereafter, "EPA") is announcing its Completion Determination remedy proposal under the Hazardous and Solid Waste Amendments (HSWA) of the Resource Conservation and Recovery Act (RCRA).<sup>1</sup> This proposal states that Corrective Action obligations at the Waters

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<sup>1</sup> "Completion Determination" is a regulatory phrase that refers to a final disposition of a facility subject to Corrective Action obligations under RCRA. In this case, the Completion Determination proposed for the Facility is one that is "Complete without Controls." More information on this category of Completion Determination can be found in the Federal Register notice entitled, Final Guidance on Completion of Corrective Action Activities at RCRA Facilities, 68 Fed. Reg. 8757 (Proposed Rule; Tuesday, February 25, 2003). This proposed rule can be accessed on EPA's website at

Corporation facility, located at 34 Maple Street and 5 Technology Drive in Milford, Massachusetts (hereafter, "Facility" or "Site") are "Complete without Controls". Investigation activities conducted at the Facility did not detect releases of hazardous wastes or hazardous constituents, and the Site does not pose a threat to human health or the environment. EPA's proposed Completion Determination is based on the results of investigation and reporting activities conducted by the Facility.

This document summarizes the regulatory status of the Facility, the results of investigation and remediation activities performed at the Facility, and the reasons for proposing that a Completion without Controls determination is appropriate. EPA is publishing this document to provide an opportunity for public review and comment on this proposal. EPA will consider public comments as part of its decision making process.

This Statement of Basis is intended to:

- Explain the opportunities for **public participation**, including how the public may comment on this proposed Completion Determination and where the public can find more detailed information;
- Provide a brief **description and history of the Facility**;
- Present the principal **findings of investigations and activities** performed to date; and,
- Present **EPA's rationale** for proposing that Corrective Action obligations under the HSWA of RCRA are Complete without Controls for the proposed current and future land use of the Site.

## THE PUBLIC'S ROLE IN EVALUATING THIS CORRECTIVE ACTION PROPOSAL / RECOMMENDATION

The EPA is issuing this Statement of Basis as part of its public participation responsibilities under RCRA. The purpose of the Statement of Basis is to present the public a summary of the assessment and remediation activities in support of Site closure. All interested persons are invited to express their views on this proposal. Public comment on all potential Corrective Action proposals or measures, and supporting information, is an important contribution to EPA's decision making process.

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[http://www.epa.gov/wastes/hazard/corrective\\_action/resources/guidance/gen\\_ca/compfeds.pdf](http://www.epa.gov/wastes/hazard/corrective_action/resources/guidance/gen_ca/compfeds.pdf)  
(accessed July 30, 2013).

### Public Comment Period

Written comments on this proposal will be accepted throughout a 30-day public comment period.

**The public comment period will last thirty (30) days from August 7, 2013 through September 5, 2013.** During this public comment period, the public is invited to review this Statement of Basis and supporting information and to offer comments to EPA.

A final decision regarding this proposed Completion Determination will not be made until the public comment period has closed and all comments received by EPA have been evaluated and addressed. EPA may modify this proposal based on any new information or substantive comments from the public.

### Written Comments

If, after reviewing the information on the Facility, you would like to comment in writing on this proposal, or on any other issues related to this proposal, you should mail your written comments (postmarked no later than **September 5, 2013**) to:

Robert Brackett  
EPA New England, Region 1  
5 Post Office Square, Suite 100  
Mail Code: OSRR07-3  
Boston, Massachusetts 02109-3912

Please be sure to clearly indicate that you are commenting on this proposal.

Questions may be directed to Robert Brackett at (617) 918-1364, or [brackett.bob@epa.gov](mailto:brackett.bob@epa.gov)

### EPA Review of Public Comments; EPA's Decision Making Process

EPA will review comments received from the public as part of the process of reaching a final decision regarding the most appropriate action at the Facility.

If EPA receives comments, then a brief decision making document (Decision Document) will be prepared by EPA to address all significant comments received

during the public comment period. If the comments result in significant changes to this proposal, EPA will seek additional public comments on a revised proposal.

If no comments are received that result in significant changes to this proposal, EPA's final decision will be issued in a brief letter to the Facility and interested parties of record.

### Additional Public Information

This Statement of Basis provides only a summary description of the Facility investigation and other activities performed at the Facility. Therefore, the public is encouraged to consult the **Administrative Record**. As explained in more detail below, the Administrative Record is the collection of information (including data, reports, etc.) that EPA relied upon for its proposed remedy decision. In this case, the Administrative Record contains this Statement of Basis, the RCRA Facility Assessment Report dated August 15, 2011, and the RCRA Facility Investigation Report dated January 2013, which describes the investigation and remediation activities conducted at the site.

The Administrative Record is available for review at the following locations:

Office of Planning/Engineering  
Milford Town Hall  
52 Main Street  
Milford, Massachusetts  
(508) 634-2317  
Monday-Friday  
8:00 AM to 12:00 PM and 1:00 PM to 4:00 PM

EPA Region 1 website

[www.epa.gov/region1/cleanup](http://www.epa.gov/region1/cleanup)

Type in 'Waters' in the 'Find a Cleanup Site' box and click 'Go'.

### BACKGROUND

The following information has been used as the basis for this Completion without Controls Determination remedy proposal and may be found in the Administrative Record at the locations provided above:

1. *RCRA Facility Assessment Report, Waters Corporation, 34 Maple Street, Milford, MA, dated August 15, 2011*
2. *RCRA Facility Investigation Report, Waters Corporation, 34 Maple Street and 5 Technology Drive, Milford, MA, dated January 2013.*

### Facility History

The Waters Corporation facility (Facility or Site) is an active facility for storage, manufacturing, and research and development of High Performance Liquid Chromatography (HPLC) instrumentation, application and supplies. The Facility is located in an industrial area bounded on the north and south by undeveloped, wooded land, to the east by the right of way for Interstate 495, and by an office complex/ industrial facility to the west. Wetlands are located to the north and northwest. The nearest surface water is an unnamed brook and wetland area associated with the Zone II Wellhead Protection Area located approximately 1,000 feet northwest of the Facility. This wetland drains to the northeast into Stall Brook, a tributary to the Charles River, which is classified as a Class A public water supply source. Groundwater flow is to the north at the 34 Maple Street property, and to the south at the 5 Technology Drive property, and occurs at a depth of 4-7 feet.

The Site occupies over 62 acres and includes the 700,000 square foot slab-on-grade main building at 34 Maple Street, and an adjacent property with three connected slab-on-grade buildings located at 5 Technology Drive. The Site is zoned for light industrial use. The Facility is the corporate headquarters for Waters Corporation, and includes a warehouse, manufacturing, and office and laboratory space. The nearest residential properties are located approximately 1500 feet west of the Site. The Site and surrounding properties are serviced by municipal water and sewer provided by the Town of Milford.

Waters Corporation began manufacturing at the newly constructed facility in Milford, MA in 1973. Prior to construction of the original building in the early 1970's, the Site and surrounding areas were open forested lands. Since operations began in 1973, Waters has manufactured HPLC instrumentation. In 2004 Waters acquired the adjacent former EMC facility, which is developed with three interconnected buildings constructed in 1986 and located to the south of the 34 Maple Street building at 5 Technology Drive.

The manufacturing processes for HPLC machines have remained relatively unchanged over the past 30 years. Metal pieces are machined on-site to form parts for the HPLC equipment, and completed machines are assembled. Other major

activities include research and development, quality testing, and demonstration and instruction of assembled machines.

### Current Conditions

A number of wastes are generated from the manufacture of HPLC instruments. Stainless steel and aluminum bars are machined down to useable parts, creating a number of waste streams. Smoke/mist filters are connected to the machines to clean exhaust air, and oil is allowed to drain back into the machine. Hazardous wastes generated include waste oil, waste oily water, and used oil absorbent pads. Water from aqueous baths used to clean machined parts is diverted to the wastewater treatment plant. Scrap aluminum and stainless steel are collected and oil is drained and stored in drums. Machined metal parts are dipped in acid solutions, washed, and finished utilizing various methods producing different waste streams. Wastewater is sent to the wastewater treatment system for pre-treatment prior to discharge to the municipal sewer. Generated wastes include waste oil, waste oily water, used oil absorbent pads, acids, and wastewater from cleaning machined parts, membrane filters, filtrate, and waste solvent.

Approximately 30 laboratories are spread throughout the four on-site buildings. The machines drain waste solvents and alcohols into collection containers located under the work benches. All collected wastes are stored in satellite accumulation areas for transportation to the loading dock and solvent storage room, before being transported off-site. At 34 Maple Street, wastes are accumulated in the loading dock area (SWMU-1) and the adjacent solvent storage area (SWMU-2). At 5 Technology Drive, SWMU-3 is a small waste storage room which holds small quantities of waste solvents and alcohols generated from nearby testing and quality control laboratories. Various satellite storage areas are located throughout the facility for both used oils and solvents.

Since its construction in 1973, the Facility has always been serviced by municipal water and sewer. Waters currently maintains a Grade 1 Industrial Wastewater Pre-Treatment System (SWMU-4). Wastewater from laboratory sinks, DI rinse water from the passivation line, and water treatment backwash are sent to holding tanks for treatment by pH neutralization using sulfuric acid and caustic soda, and membrane filtration for aqueous wastes. An oil skimmer attached to the holding tank generates waste oil, which is collected.

All oil and hazardous materials storage areas are located indoors, or within covered areas with secondary containment in the event of a spill or leak. Storm water is drained from the paved parking lot areas by catch basins which drain to retention

ponds located around the Waters property. Rain water from roof scuppers is discharged to the ground or to underground piping leading to the retention ponds. Waters maintains a "No Exposure Certification for Exclusion from NPDES Stormwater Permitting" certificate, exempting the facility from NPDES permitting and sampling requirements.

Two No. 2 fuel oil underground storage tanks (UST) were until recently located along the front of the 34 Maple Street facility (AOC-1) from approximately 1990 until 2012. Additionally, three No. 2 fuel oil storage tanks were until recently located around the buildings at 5 Technology Drive; one 2,500 gallon AST, one 1,000 gallon UST and one 2,000 gallon UST (AOC-2).

### Historical Conditions/Practices

In May 1983, Waters filed a Part A Hazardous Waste Permit Application. The facility was operating as a TSDF under interim status for the storage of waste solvents. At the time of the permit application, Waters maintained three waste USTs located on the northern and western side of the main building. Wastes were fed through floor drains from the manufacturing and research/development areas and piped to the USTs. When the USTs were removed in 1985, the floor drains were capped. Three virgin chemical storage tanks (AOC-3) were located adjacent to the three waste USTs.

In the early 1980s, the majority of the manufacturing processes generating waste solvents were moved to a manufacturing facility in Taunton, Massachusetts. After the change, significantly less waste was being generated at the Milford Facility. In March 1985, Waters applied for a change of status to Large Quantity Generator and submitted a closure plan. Based on DEQE approval, Waters closed and decontaminated the drum storage area and removed the three waste USTs and three virgin product tanks in October 1985. The DEQE was onsite and satisfied that the tanks and connecting piping were tight and that the soil surrounding the tanks was clean and without odor. Formal closure of TSDF status by the DEQE was approved in a letter dated July 7, 1987.

In 2004, Waters purchased the southern adjacent property at 5 Technology Drive. The property was 19.14 acres occupied by three connected buildings totaling approximately 252,000 square feet. The prior operator EMC, a computer assembly and software development company, used the buildings primarily as office and server space since their initial construction. Three monitoring wells were installed on the 5 Technology Drive property during an ASTM Phase I Real Estate investigation prior to the purchase of the facility by Waters. Soil and groundwater

samples were collected from the three borings/wells and analyzed. Soil samples were screened for metals, pesticides, and extractable and volatile petroleum hydrocarbons. The results did not indicate the presence of contamination on the site. Groundwater samples were analyzed for volatile organic compounds and extractable and volatile petroleum hydrocarbons. Low concentrations of organics, below their respective MassDEP reportable standards, were detected in groundwater in one of the three wells. Acetone was detected at 55 ppb. The remaining three constituents, benzene, toluene, and 1,2,4-trimethylbenzene were detected at concentrations of 1.0 ppb, 1.4 ppb, and 1.1 ppb, respectively. The applicable MassDEP Reportable Concentrations are approximately 2 orders of magnitude greater than the detected concentrations.

### **RFA Recommendations**

The RFA identified six SWMUs and four AOCs at the Site, and provided recommendations on the need for further evaluation at each location.

SWMU-1. Loading Dock Area. In use since 1973, waste caustic and waste acid is drummed and accumulated in separate areas of the loading dock. Oily metal debris is accumulated in roll off containers. There is a small holding sump for spills, connected to a retention tank that is part of the Wastewater Pretreatment System. The area is covered by a roof, has two solid walls, and two sides constructed of slated chain link fence. There have been no reported releases from this unit. The RFA concluded there was a low risk of a release and did not recommend any sampling or additional investigations at SWMU-1.

SWMU-2. Solvent Storage Room. In use since 1973, the drum storage room is a metal storage building designed for the storage of flammable liquids. The building includes a pitched concrete floor to contain any leaks or spills. Open drums are stored and filled inside a fume hood, and sealed drums are stored in the center of the room until they are shipped offsite for disposal. The Solvent Storage Room stores both waste solvents and waste oils, in addition to virgin oil and solvent drums. The RFA concluded there was a low risk of a release and did not recommend investigations at SWMU-2.

SWMU-3. Waste Storage Room. In operation since 2008, the Waste Storage Room is located on the first floor of Building C at 5 Technology Drive, and is used as a storage area for flammable waste solvents. Virgin solvents are stored on secondary containment. Small quantities of waste solvents are stored in this room. The RFA did not recommend investigation of SWMU-3.

SWMU-4. Wastewater Pretreatment System. The system has operated since 1994. Historically, process wastewater was discharged into the POTW sanitary sewer without pretreatment. In 1994, Waters installed a pretreatment system prior to discharge to the municipal sewer. The system collects wastewater from laboratory sinks, rinse water, and water treatment backwash. The system then neutralizes the pH with sulfuric acid and caustic soda, membrane filtration, and a batch process evaporator with an oil skimmer. The entire system is submerged in a concrete sump for secondary containment. In the event of a leak, wastewater in the sump can be pumped into a 1,000 gallon emergency storage tank. Treated wastewater is discharged to the POTW at an average flow rate of 3,000 gallons per day. There have been no releases reported in connection with the operation of this area. The RFA concluded that no further investigations were warranted in this area.

SWMU-5A, SWMU-5B, and SWMU-5C, Former Waste USTs, and SWMU 5D, Former Floor Drains. In operation from the 1970s until 1985, Waters stored hazardous wastes in three USTs located on the northern and western sides of the building. Floor drains located inside the manufacturing area were piped to the USTs. The tanks were removed from the site as part of the Clean Closure of TSD activities in 1985. The floor drains were capped prior to the USTs being removed from service. Clean closure was certified by the Massachusetts Department of Environmental Quality Engineering (DEQE). The tanks and associated piping were found to be tight, and soils surrounding the tanks were clean and without odor. The waste stream consisted of waste organics and solvents. The RFA recommended confirmatory sampling to ensure that the USTs had not leaked.

SWMU-6. Domestic Waste. Trash compactors have operated at the Site since 1973. Domestic waste is compressed and stored until it is picked up for off-site disposal. The trash compactors operate hydraulically, and contain approximately 15-gallons of hydraulic oil. In 1996, the hydraulic oil line on one of the trash compactors ruptured, releasing approximately 15-gallons of hydraulic oil onto the asphalt pavement surrounding the compactor, which was quickly cleaned up. The release was closed out under the MCP with a Class A-1 Response Action Outcome (RAO). The RFA did not recommend further investigation of this SWMU.

AOC-1. Heating Oil USTs. Two No. 2 fuel oil USTs were located along the front of the 34 Maple Street facility as a fuel supply for emergency generators. Both USTs were 15,000 gallon double walled fiberglass, with interstitial monitoring. The tanks were installed in July 1990 and may have replaced older tanks that were in use during the 1970s (one 15,000 gallon and one 10,000 gallon UST in approximately the same locations). There have been no known releases of oil from these tanks. The

RFA recommended confirmatory sampling of soils and/or groundwater. These tanks were removed in 2012 as discussed under 2012 UST Removals, below.

AOC-2A, AOC-2B, and AOC-2C. Emergency Generator Tanks. Used from the 1980s until 2012, three emergency generators are located around the building at 5 Technology Drive, and each generator had a No. 2 fuel oil tank associated with it. AOC 2A was a 2,500-gallon Aboveground Storage Tank (AST). AOC-2B was a 1,000-gallon UST, and AOC-2C was a 2,000-gallon UST. Each tank had leak prevention capabilities. No releases from these tanks had been reported. The RFA recommended that the existing monitoring wells be re-sampled. These tanks were removed in 2012 as discussed under 2012 UST Removals, below.

AOC-3A, AOC-3B, AOC-3C - Former Virgin Material USTs. These three USTs were in use from the 1970s to 1985. Historically, Waters utilized large quantities of organic solvents and chemicals on-site which were stored in three USTs located on the northern and western sides of the building. The tanks were removed as part of the Closure of TSDF activities in 1985. DEQE certified clean closure and that post closure activities were not required. AOC-3A was a 1,000 gallon UST used to store acetone. AOC-3B was a 3,000 gallon UST also used to store acetone. AOC-3C was a 1,000 gallon UST used to store toluene. The RFA recommended that the area be investigated.

AOC-4. Roof Vents. Roof vents exist in a number of locations at 34 Maple Street. These vents provide ventilation for manufacturing activities. Air ducts are connected to each machine used in the manufacturing process to collect smoke and oil vapor. The air is then off-gassed through stacks on the roof. Because the roof can become contaminated, storm water that falls on the roof could potentially transport contaminants via the downspouts to the ground or collection basins. The RFA recommended sampling of roof drains.

### **January 2013 RFI Report**

Based on the results of the RFA and discussions with EPA, Waters submitted the June 2012 Quality Assurance Project Plan (QAPP) and Sampling and Analysis Plan (SAP). The QAPP/SAP was used to guide the RFI investigation under the applicable requirements of the Massachusetts Contingency Plan (MCP). The investigation included advancing soil borings and collection and analysis of soil samples, installation and sampling of monitoring wells, and collection and analysis of a roof drain sample. All four remaining fuel oil USTs were removed from the Site in 2012. The RFI Report describes the methods and results of the UST removals, the RFI Site investigation, and the RFI risk characterization.

### Applicable MCP Groundwater and Soil Categories.

The MCP classifies groundwater as one or more of three categories, *GW-1*, *GW-2*, and *GW-3*. Category *GW-1*, which does not apply to the Site, is protective of current and potential drinking water source areas. Category *GW-2* applies at the Site and is protective of volatilization of contaminants from groundwater to indoor air. Category *GW-3* is for all groundwater and is protective of groundwater discharge to surface water.

The MCP classifies soil in three categories (*S-1*, *S-2*, and *S-3*) based on frequency and intensity of use, accessibility, and whether children or adults are present. At the Site, frequency of use by adults is high, and children are generally not present. Intensity of use is low, because site activities do not significantly disturb soil. Potentially impacted soil is located beneath both paved and unpaved areas. The applicable soil categories are *S-2* for surficial and unpaved soil, and *S-3* for paved soil. The Reportable Concentrations are categorized as *RCS-2*.

### RFI Subsurface Investigation

On June 26, 2012, seven soil borings were conducted to investigate then current and former USTs at *AOC-1*, *AOC-2*, and *AOC-3/SWMU-5*. Four soil borings were conducted in the area of *SWMU-5A* and *SWMU-5B* and *AOC 3*. Two of the borings were completed as monitoring wells *MW-1* and *MW-2*. At *AOC-1*, one boring was conducted. One soil boring was completed as monitoring well *MW-4* within *AOC-5C*. Soil samples were collected continuously and screened with a PID. Each well was completed to approximately 10 feet bgs. At the 5 Technology Drive property, a previously installed monitoring well downgradient of *AOC-2C* was replaced with monitoring well *MW-6*. One soil sample from each boring was selected and analyzed for VOCs. In addition, soil samples from *MW-3* and *MW-6* were analyzed for VPH and EPH with targeted VOC and PAH compounds. No compound was detected at a concentration above the laboratory detection limit.

### 2012 UST Removals

The January 18, 2013 Report details the July and November 2012 removal of four USTs (two 15,000 gallon heating oil USTs at *AOC 1*, and one 1,000 gallon heating oil UST from *AOC 2B* and one 2,000 gallon heating oil UST from *AOC 2C*). The RFI contains an UST Closure Assessment Report, prepared in accordance with the UST Closure Assessment Manual, MADEP Policy #WSC-402-96. Further details for the UST removals are discussed below.

On July 2 and 3, 2012, the two fiberglass 15,000 gallon No. 2 fuel oil USTs located on the west side of the building at AOC 1 were removed. The Milford Fire Department was on-Site to observe the removal of the USTs. The USTs showed no signs of corrosion, breakage, or loose fittings, and there was no staining of soil around the fill pipe or UST connections as the tanks were uncovered. When piping connecting the tanks was pulled out, a small volume of fuel oil remaining in the pipe inadvertently drained to soil next to the USTs. This freshly impacted soil was excavated and set aside on poly sheeting spread out on the pavement. Upon inspection, the piping appeared to be intact, and there was no liquid or staining indicative of a release. Field screening was conducted using photo ionization detector (PID) soil headspace readings from soil stockpiles, above and adjacent to the USTs, and at the excavation sidewalls. PID readings ranged from background to 80 ppm (highest in the soil stockpile from the pipe drainage). Soils with PID concentrations above background were stockpiled for off-site disposal. Following removal of the tanks, no signs of corrosion, pitting, or other compromises were observed. There was no indication of a release to the soils, and no sheen was observed on groundwater in the excavation.

On November 9, 2012, Waters removed the 1,000 gallon fiberglass No. 2 fuel oil UST (AOC-2B) and the 2,000 gallon fiberglass No. 2 fuel oil UST (AOC-2C) located on the eastern side of the 5 Technology Drive property. The Milford Fire Department was on-site to observe the removal of the tanks. The steel double walled piping appeared to be intact and there was no liquid or staining indicative of a release. When the USTs were uncovered, there were no obvious signs of corrosion, breakage, or loose fittings, and no staining of soils around the fill pipes or UST connections. Field screening with a PID was performed. Groundwater entered the bottom of the excavation to about 7 or 8 feet below grade. No hydrocarbon sheen was observed on the groundwater. Following removal, the tanks were visually inspected for corrosion and staining, and no issues were observed. Soil samples were collected after removal of the USTs. Samples were analyzed for VPH and EPH and VOCs. Results were either non-detect, or detected at a concentration well below the applicable MassDEP Reportable Concentration.

At AOC-2B, the highest PID headspace concentration of 7 ppm was from a surficial soil sample collected at the base of the fill pipe. PID readings from the remainder of the soil samples were non-detect. Soil samples were composited by the laboratory into one composite sample which was analyzed for VPH and EPH, both with targeted VOC and PAH compounds. Each of the VPH and EPH carbon fractions and targeted VOCs and PAHs were non-detectable. Methylene chloride was

detected at a concentration of 0.1 ppm, well below the RCS-2 Reportable Concentration.

At AOC-2C, the highest PID headspace concentration of 2 to 6 ppm was from a sample collected at the soil/groundwater interface at approximately 7 to 8 feet bgs. Three soil samples were submitted to the lab where they were composited into one sample and analyzed for VPH and EPH, both with targeted VOC and PAH compounds. Each of the VPH and EPH carbon fractions and targeted VOC and PAH compounds were non-detectable. Methylene Chloride was the only VOC detected, but at concentrations well below the RCS RCs.

PID readings ranged from 0-80 ppm in AOC-1 where fuel oil accidentally drained from the piping into the soil during tank removal operations. Approximately 22 cubic yards of soil was excavated from AOC-1 and disposed off-site. There were no visible signs of hydrocarbon impact and no soil concentrations that were above the applicable MassDEP RCS-2 RCs.

#### Groundwater Sampling.

Groundwater samples were collected from wells MW-1, MW-2, MW-4, and MW-6 on July 12, 2012. Each sample was analyzed for VOCs. Well MW-5 and MW-6 samples were also analyzed for VPH and EPH with the targeted VOCs and PAHs. Results indicated low levels of C9-C18 aliphatics (240 ppb) and C19-C36 aliphatic (280 ppb) EPH compounds were detected in MW-6. These concentrations are well below the applicable MADEP RCs of 5,000 ppb and 50,000 ppb, respectively. The remaining VPH and EPH compounds, as well as the targeted PAH compounds were not detected. Very low concentrations of acetone and chloroform, which are suspected of being laboratory contaminants, were detected in wells MW-2, MW-4, and MW-6 at concentrations well below applicable RCs. In summary, most results were non-detect, and all of the compounds detected were well below reportable concentrations. The RFI concluded no additional investigation of groundwater was warranted.

#### Roof Drain Sampling.

On August 15, 2012, a sample of stormwater discharge from the machine shop roof drain was collected at the point where the roof discharges into a stormwater catch basin. The sample was analyzed for total metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver). Of these compounds, only lead was detected at a concentration of 1 ppb, well below the RC.

### RFI Conclusions

The RFI concluded that there are no known impacts to human or environmental receptors or potential receptors. Analytical data obtained from the Site do not constitute a reportable condition to MassDEP. No soil or groundwater contaminant concentrations exceeded the MCP RC or applicable Method 1 Soil and Groundwater Standards. Those contaminants that were detected above laboratory detection limits do not pose a risk to human health or the environment.

### EPA Proposed Decision

Based on the above information, EPA is proposing a Completion without Controls Determination for the Facility. In accordance with EPA guidance on Completion Determinations, EPA New England believes a Completion without Controls Determination is appropriate because:

- (1) the facility has completed removal of all USTs at the Site, and there were no issues found. There are no on-going treatment, storage, or disposal activities that require a permit. All Closure requirements have been fulfilled;
- (2) the facility has completed a focused soil, groundwater, and stormwater investigation, and no significant contamination was found;
- (3) Protection of human health and the environment has been achieved and no additional remedial activity or controls are required to maintain protection of human health and the environment. All Corrective Action obligations have been met.

Note 1: Notwithstanding this Completion Determination, EPA or an authorized State may conclude additional cleanup is needed if, subsequent to this Completion Determination, EPA or an authorized State discovers evidence of unreported or misrepresented releases.

### EPA'S RATIONALE FOR DISCONTINUATION OF THE FACILITY'S CORRECTIVE ACTION OBLIGATIONS

As briefly described above, EPA believes a Corrective Action "Complete with Controls" Completion Determination is appropriate for the following reasons:

- 1. All USTs at the Site have been removed. No significant contamination was detected in soils or groundwater in the vicinity of the USTs and former USTs.**

As a result of UST removals and investigations, no significant contamination was detected in groundwater or soils samples collected from around the former USTs. No contaminant sources have been found. A limited volume of soils were removed

and disposed of off-site during the UST removals and no further remedial activities are necessary.

**2. The facility has completed an RCRA Facility Investigation, and no significant contamination was found.**

Evaluation of Remedy with respect to Standards and Decision Factors

EPA New England believes that, in addition to the rationale presented above, evaluation of the Facility with respect to Remedy Selection Criteria set forth in available EPA guidance provides a framework for measuring the effectiveness of a proposed remedy. See *Corrective Action for releases from Solid Waste Management Units at Hazardous Waste Management Facilities*, 61 Fed. Reg. 19432, 19449 (proposed May 1, 1996). These Remedy Selection Criteria are presented below:

**Threshold Criteria:**

Overall Protection. This completion determination proposal provides protection of human health and the environment. Specifically, the investigative and remedial work conducted by the Facility demonstrates protection of human health, public welfare, and the environment for current and future use as these terms are defined in the MCP.

Attainment of Media Cleanup Standards. This proposed completion determination attains the Method 1 MCP media protection standards.

Controlling Sources of Releases. No historical releases were identified in the site file, and no releases were identified as a result of the UST, soil, groundwater and roof drain runoff investigations.

Compliance with Waste Management Standards. The proposed remedy complies with all applicable requirements for the management of solid wastes.

**Balancing Criteria:**

Long-term Reliability and Effectiveness. This remedy is for no further action, since no monitoring or engineering controls are needed to maintain the reliability and effectiveness of this proposed Completion Determination.

Reduction of Toxicity, Mobility, or Volume of Wastes. No significant contamination was detected as a result of the investigations.

Short-term Effectiveness. The proposed remedy is comprehensive in the short-term since there are no risks to human health or the environment.

Implementability. This remedy easily implemented since no further actions are required to protect human health and the environment.

Cost. The Facility has spent significant time and money for hazardous waste unit closure and investigation activities at the Site. A Completion with Controls completion determination is appropriate for the Facility.

In summary, EPA, using all available information, is announcing its Corrective Action "Completion without Controls" Completion Determination proposal. As a result of investigations performed at the Facility, no releases have been detected. Completion without Controls Determination is reasonable and appropriate.