

**EXPLANATION OF SIGNIFICANT DIFFERENCE
BAIRD & MCGUIRE SUPERFUND SITE
HOLBROOK, MASSACHUSETTS
OPERABLE UNIT 4
ALTERNATE WATER SUPPLY**

Site Name: Baird & McGuire Superfund Site

Location: Holbrook, Massachusetts

Lead Agency: U.S. Environmental Protection Agency

Support Agency: Massachusetts Department of Environmental Protection

Under Section 117(a) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), and promulgated in 40 C.F.R. Sections 300.435(c)(2)(I) and 300.825(a)(2), if the United States Environmental Protection Agency (EPA) determines that the remedial action at the Baird & McGuire Superfund Site (site) differs significantly in scope, performance or cost from the Record of Decision (ROD) for the site, EPA shall publish an explanation of significant difference between the remedial action being undertaken and the remedial action set forth in the ROD and the reasons such changes are being made.

This Explanation of Significant Difference (ESD) addresses changes to the Operable Unit 4 - Alternate Water Supply ROD. Included in this ESD is a brief history of the site, a description of the remedy selected in the Alternate Water Supply ROD signed on September 27, 1990, and a description of and rationale for the changes to this Alternate Water Supply ROD.

This ESD and other supporting documents can be found in the Administrative Record located at EPA's Region I Records Center, located at One Congress Street, Suite 1100, Boston, Massachusetts, 02114-2023 with hours from Monday thru Friday 8 a.m. - 1 p.m. and 2 p.m. - 5 p.m., and at the Holbrook Public Library, 2 Plymouth Street, Holbrook, Massachusetts 02343.

I. Site History

The site consists of approximately 32.5 acres and is located on South Street in Holbrook, MA. The site includes the location of a former chemical mixing and batching company (Baird & McGuire, Inc.), property that had Baird & McGuire ownership, privately owned lots and property owned jointly by the Towns of Holbrook and Randolph. Land use in the general vicinity of the site (i.e., to the north and south of the site along South Street; on Center and Union Street and the Cochato Industrial Park located to the east of the site) is primarily industrial/commercial. The area west of South Street is primarily residential. The Cochato River forms the eastern perimeter

of the site.

Baird & McGuire, Inc. operated a chemical mixing and batching company from 1912 until 1983. The state became involved with the site in the period between 1954 and 1977 when the company was fined at least thirty-five times for numerous violations of the Federal Insecticide, Fungicide and Rodenticide Act of 1947 (FIFRA). In 1981 and 1982, the Massachusetts Department of Environmental Quality Engineering (DEQE) documented a number of questionable disposal practices. From February through April 1982, Baird and McGuire voluntarily undertook a series of remedial actions. In October 1982 the site was proposed to the National Priority List and finalized on September 8, 1983. EPA initiated a removal action at the site which included the removal of 1,000 cubic yards of contaminated soil, the construction of a clay cap, the installation of a groundwater interception/recirculation system and construction of limited fencing. On May 2, 1983, the Board of Selectman of Holbrook revoked the Baird & McGuire's permit to store chemicals at the site and ordered it to dismantle its existing storage facilities. As a result of this order, Baird & McGuire was forced to cease operations.

II. Summary of Remedy

EPA has issued three RODs for four remedial operable units at the site (EPA, 1986; 1989; 1990). The first ROD, issued in September 1986, included Operable Unit 1, groundwater extraction and treatment at an on-site plant to address groundwater (Groundwater ROD) and Operable Unit 2, to address soil excavation and treatment at an on-site incinerator. The second ROD, issued in September 1989, addressed contamination in the Cochato River sediments (Operable Unit 3). The final ROD, Operable Unit 4, was issued in 1990, and called for the reopening of the Donna Road Wellfield as an alternative water supply for the community (Alternate Water Supply ROD).

The Groundwater ROD specified groundwater extraction and on-site treatment to address a groundwater contaminated plume that originated from the Baird & McGuire property and extending beyond the Cochato River. The current system consists of six extraction wells that pump contaminated groundwater to a groundwater treatment facility and four recharge basins for discharge of treated groundwater back to the aquifer. This plant has been operating for approximately ten years. Subsequent to the 1986 ROD, it was determined that light non-aqueous phase liquid (LNAPL) is present at the central part of the site plume. A LNAPL remediation system became operational in March 1999 and continues to operate. Operable Units 2 and 3, which addressed soil and sediment contamination, have been completed.

The Alternate Water Supply ROD required an alternate water supply be developed to address the imminent risk that was thought to exist due to the loss of the South Street Wellfield, located within 1,500 feet of the site. The last operating well in the South Street Wellfield was shut down in 1982 due to contamination which likely came from the site. The Town of Holbrook used the South Street wells from 1958-1982 as a portion of its baseline water supply. The lost

demand from this wellfield was estimated to be about .31 million gallons per day (mgd). Shutdown of the South Street wells forced the Town of Holbrook to rely completely on the water treatment facilities shared with Randolph and a surface water supply shared with the Towns of Randolph and Braintree. Holbrook, Randolph and Braintree draw drinking water from the Great Pond Reservoir system which consists of Great Pond, Upper Reservoir and Richardi Reservoir. The Alternate Water Supply ROD required the reactivation of the Donna Road Wellfield to supplement water to the Great Pond Reservoir system. Although this remedy was selected in 1990 and subsequently determined to be a state lead OU, the remedy has not yet been implemented due to several administrative delays. The Alternate Water Supply ROD basically supplemented the Groundwater ROD by reducing the risk in the interim until groundwater cleanup standards are met at the site by ensuring that the community has sufficient drinking water.

III. Explanation of Significant Difference

In an August 2003 ESD to the Groundwater ROD, EPA changed the groundwater remedy to include excavation of the Upper Reservoir/Great Pond located in Braintree and Randolph. The purpose of the excavation was to provide additional water supply capacity to be used in the interim to supplement the community's drinking water until the groundwater remedial action is complete. In light of the August 2004 ESD to the Groundwater ROD, the necessity to reactivate the Donna Rd. Wellfield to ensure the protectiveness of the Groundwater ROD in the interim is no longer necessary. EPA believes the increase in additional drinking water capacity of the Upper Reservoir/Great Pond as provided by the August 2004 ESD to the Groundwater ROD, should be sufficient to eliminate any interim risk until cleanup levels are met in the Groundwater ROD. Thus, EPA will not implement the remedy proposed in the Alternate Water Supply ROD and it will take no further action for Operable Unit 4.

IV. Support Agency Comments

The Massachusetts Department of Environmental Protection has reviewed this ESD and has concurred with EPA in its issuance.

V. Affirmation of Statutory Determinations

As this is a decision for No Action, the statutory requirements for CERCLA 121 for remedial actions are not applicable.

VI. Public Participation Activities

This ESD and supporting information are available for public review at the locations and times identified in the introduction of this document. In addition, a notice of availability and brief description of the ESD will be provided to the Patriot Ledger, a local newspaper of general circulation.

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VII. Declaration

For the foregoing reasons, by my signature below, EPA is issuing this Explanation of Significant Difference for the Baird McGuire Superfund Site in Holbrook, Massachusetts.

August 21, 2003
Date

Susan Studlien
Susan Studlien, Acting Director
Office of Site Remediation & Restoration
EPA - New England