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# Charles George Land Reclamation Trust Landfill

NPL Site  
Administrative Record  
(As supplemented pursuant to the  
February 26, 1990 Order on Remand)

ROD III Signed: September 29, 1988

## Index

Prepared for

Region I  
Waste Management Division  
U.S. Environmental Protection Agency

With Assistance from

**AMERICAN MANAGEMENT SYSTEMS, INC.**

One Kendall Square, Suite 2200 • Cambridge, Massachusetts 02139 • (617) 577-9915

## Introduction

This section is the Index to the Administrative Record for Operable Unit III of the Charles George Land Reclamation Trust Landfill National Priorities List (NPL) site. Guidance documents used by EPA staff in selecting response actions at the site are listed at the end of the Administrative Record Index.

The Administrative Record for the Charles George Land Reclamation Trust Landfill NPL site which EPA has certified to the Federal District Court on October 1, 1990 as complete includes the original Administrative Record for this site dated September 29, 1988 and the Supplemented Administrative Record for this site dated October 1, 1990. This Supplemented Administrative Record was compiled by EPA pursuant to the February 26, 1990 Order on Remand.

In addition to this Administrative Record certified and submitted to the court, the defendants have requested and the court has allowed certain other documents to be treated as part of the record. These additional materials, which EPA did not primarily rely on in selecting the remedy for the Charles George Landfill, are comprised of those documents which Original Defendants and New Defendants requested to be included by their written comments submitted to EPA on August 3, 1990. (See Record of Decision [ROD] III Administrative Record Index as Supplemented Pursuant to the February 26, 1990 Order on Remand, Section 5.4.)

The Administrative Record is available for public review at EPA Region I's Office in Boston, Massachusetts, and at the Littlefield Public Library, Tyngsborough, Massachusetts 01879. *This Administrative Record includes, by reference only, all documents included in the Administrative Records for the December 29, 1983 and July 11, 1985 RODs for this NPL Site.* Questions concerning the Administrative Record should be addressed to the EPA Region I site manager.

The Administrative Record is required by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA).

To facilitate understanding of the site, the three "operable units" or project phases for the site are defined as follows:

- Operable Unit I: The planning, design and construction of a new, permanent waterline serving the Cannongate Condominiums and surrounding area.
- Operable Unit II: The planning, design and construction of a landfill cap and appurtenant systems.
- Operable Unit III: The planning, design and construction of clean-up actions to remediate "off-site" contamination, including the treatment of collected leachate.

**ADMINISTRATIVE RECORD INDEX**  
**for the**  
**Charles George Land Reclamation Trust Landfill NPL Site**  
**(Operable Unit III)**

3.0 Remedial Investigation (RI)

3.1 Correspondence

1. Letter from Steven P. Farrick, EPA Region I to John A. George, NUS Corporation (January 16, 1986).
2. Letter from John A. George, NUS Corporation to Steven P. Farrick, EPA Region I (August 13, 1986).
3. Letter from Steven P. Farrick, EPA Region I to Dale Young, Commonwealth of Massachusetts Department of Environmental Quality Engineering (December 9, 1986).
4. Letter from Steven P. Farrick, EPA Region I to Dale C. Mosher, E.C. Jordan Co. (February 6, 1987).
5. Letter from Dale C. Young, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Joseph Reidy, Town of Tyngsborough Conservation Commission (August 31, 1987).
6. Letter from Julio Olimpio, U.S. Department of the Interior Geological Survey to David Lang, EPA Region I (March 17, 1988).

3.2 Sampling and Analysis Data

*The Sampling and Analysis Data for the Remedial Investigation (RI) may be reviewed, by appointment only, through EPA Region I, Boston, Massachusetts.*

3.4 Interim Deliverables

1. "Final - Landfill Gas Characterization," MDS Advanced Analytics, Inc. for the Commonwealth of Massachusetts Department of Environmental Quality Engineering (June 1986).
2. "Final - Wetlands Assessment," GCA Corporation (June 1986).
3. "Suggestions for Further Study," NUS Corporation (August 1986).
4. "Draft - Field Operations Plan (FOP) - Initial Sampling and Analysis Activities," EBASCO Services, Inc. (November 1986).
5. "Final - Field Operations Plan (FOP) - Initial Sampling and Analysis Activities," EBASCO Services, Inc. (February 1987).

3.5 Applicable or Relevant and Appropriate Requirements (ARARs)

1. Letter from Dale C. Young, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Steven P. Farrick, EPA Region I (July 15, 1987).
2. "Application for Permit to Discharge to Waters of the Commonwealth" Form, Commonwealth of Massachusetts Department of Environmental Quality Engineering.
3. "Application for Permit to Discharge to Ground" Form, Commonwealth of Massachusetts Department of Environmental Quality Engineering.

### 3.6 Remedial Investigation (RI) Reports

#### Reports

1. "Preliminary Remedial Investigation Report - Volume I (Narrative)," NUS Corporation (September 1986).
2. "Preliminary Remedial Investigation Report - Volume II (Appendices)," NUS Corporation (September 1986).
3. "Draft Final - Remedial Investigation Report - Volume I," EBASCO Services, Inc. (July 1988).
4. "Draft Final - Remedial Investigation Report - Volume II - Appendices," EBASCO Services, Inc. (July 1988).

#### Comments

5. Comments Dated December 2, 1986 from Margaret E. Sheehan, Commonwealth of Massachusetts Department of the Attorney General on the September 1986 "Preliminary Remedial Investigation Report," NUS Corporation.

### 3.7 Work Plans and Progress Reports

1. "Quality Assurance Project Plan - Wetlands Assessment," GCA Corporation (January 22, 1986).
2. "Final - Work Plan Memorandum," EBASCO Services, Inc. (July 1986).
3. "Endangerment Assessment - Revised Work Plan," Planning Research Corporation (December 15, 1986).
4. "Work Plan - Part 1 - Remedial Investigation," EBASCO Services, Inc. (December 1986).

### 3.10 Endangerment Assessments

#### Reports

1. "Final - Endangerment Assessment," Planning Research Corporation (January 1987).

#### Comments

2. Comments Dated August 4, 1988 from Thomas J. Hoey on the January 1987 "Final - Endangerment Assessment," Planning Research Corporation.

### 4.0 Feasibility Study (FS)

#### 4.2 Sampling and Analysis Data

*The Sampling and Analysis Data for the Feasibility Study (FS) may be reviewed, by appointment only, through EPA Region I, Boston, Massachusetts.*

#### 4.4 Interim Deliverables

1. "Draft CORA Expert System Report" (May 14, 1987).

#### 4.6 Feasibility Study (FS) Reports

1. "Feasibility Study on Treatment of Leachate," Camp Dresser & McKee, Inc. (February 1986).
2. "Draft - Final Feasibility Study Report," EBASCO Services, Inc. (July 1988).

#### 4.9 Proposed Plans for Selected Remedial Action

##### Reports

1. "EPA Proposes Phase III Cleanup Plan for Charles George Landfill Site," EPA Region I (July 1988).

##### Comments

2. Comments Dated August 8, 1988 from Claire Farrington on the July 1988 "Proposed Plan - Phase III Cleanup Plan for Charles George Landfill Site," EPA Region I.
3. Comments Dated August 23, 1988 from Elizabeth Coughlin, Town of Tyngsborough on the July 1988 "Proposed Plan - Phase III Cleanup Plan for Charles George Landfill Site," EPA Region I.
4. Letter from Susan M. Cooke and Michael P. Last, Goodwin, Procter & Hoar for the PRP Steering Committee to David Dickerson, EPA Region I (August 23, 1988) with attached Comments Dated August 24, 1988 from GEI Consultants, Inc. for the PRP Steering Committee on the July 1988 "Proposed Plan - Phase III Cleanup Plan for Charles George Landfill Site," EPA Region I.
5. Comments Dated September 16, 1988 from Dale C. Young, Commonwealth of Massachusetts Department of Environmental Quality Engineering on the July 1988 "Proposed Plan - Phase III Cleanup Plan for Charles George Landfill Site," EPA Region I.
6. "Additional Comments on EPA Phase III Proposed Plan and Pilot Studies," GEI Consultants for the PRP Steering Committee (September 26, 1988).
7. Letter from Susan M. Cooke, Goodwin, Procter & Hoar and Michael P. Last, Gaston & Snow for the PRP Steering Committee to David Dickerson, EPA Region I (September 27, 1988).

#### 5.0 Record of Decision (ROD)

##### 5.1 Correspondence

1. Letter from Richard Cavagnero, EPA Region I to Robert Bois, Commonwealth of Massachusetts Department of Environmental Quality Engineering (July 8, 1988).

##### 5.3 Responsiveness Summaries

##### Reports

1. Cross Reference: Responsiveness Summary is Appendix A of the Record of Decision [Filed and cited as entry number 2 in 5.4 Record of Decision (ROD)].

##### 5.4 Record of Decision (ROD)

1. Record of Decision, EPA Region I (September 29, 1988).

## 11.0 Potentially Responsible Party (PRP)

### 11.7 PRP Steering Committee Documents

1. Letter from Mike Walters, Polaroid Corporation for the PRP Steering Committee to David Dickerson, EPA Region I (February 23, 1988).
2. Letter from Mike Walters, Polaroid Corporation for the PRP Steering Committee to David Dickerson, EPA Region I (April 5, 1988).
3. Letter from Mike Walters, Polaroid Corporation for the PRP Steering Committee to David Dickerson, EPA Region I (May 24, 1988).
4. Letter from Stephen Wald, Craig & Macauley to Joseph J. McGovern, U.S. Department of Justice and Susana Cortina de Cardenas, EPA Region I with attached "Proposal for a Gas Recovery Project," O'Brien Energy Systems (May 26, 1988).
5. Letter from Mike Walters, Polaroid Corporation for the PRP Steering Committee to David Dickerson, EPA Region I (June 21, 1988).
6. Letter from Susan M. Cooke, Goodwin, Procter & Hoar for the PRP Steering Committee to Susana Cortina de Cardenas, EPA Region I (July 15, 1988) with attachments.
7. Letter from Mike Walters, Polaroid Corporation for the PRP Steering Committee to David Dickerson, EPA Region I (July 25, 1988).
8. Letter from Michael P. Last, Gaston & Snow for the PRP Steering Committee to William Walsh-Rogalski, EPA Region I (July 27, 1988).

## 13.0 Community Relations

### 13.1 Correspondence

1. Letter from Steven P. Farrick, EPA Region I to Richard Davis, Tyngsborough Citizen's Advisory Committee (April 8, 1987).
2. Letter from Richard Davis, Tyngsborough Citizen's Advisory Committee to Steven P. Farrick, EPA Region I (June 5, 1987).
3. Letter from David Dickerson, EPA Region I to the Littlefield Public Library (July 22, 1988).
4. Letter from David Dickerson, EPA Region I to the Town of Tyngsborough Board of Health (July 22, 1988).

### 13.4 Public Meetings

1. "Public Meeting Summary," EBASCO Services, Inc. (January 1987).
2. Meeting Notice, Commonwealth of Massachusetts Department of Environmental Quality Engineering (April 8, 1987).
3. Meeting Notes, EPA Region I, Commonwealth of Massachusetts Department of Environmental Quality Engineering and Citizens Advisory Committee (April 8, 1987).
4. Public Notice, "The United States Environmental Protection Agency Invites Public Comment on the Phase III Feasibility Study and Proposed Plan for the Charles George Reclamation Trust Landfill Superfund Site in Tyngsborough, Massachusetts and Announces the Availability of the Site Administrative Record," EPA Region I (July 28, 1988).

### 13.5 Fact Sheets

1. "Superfund Program Information Sheet," EPA Region I (November 1986).

14.0 Congressional Relations

14.1 Correspondence

1. Letter from Michael R. Deland, EPA Region I to John Kerry, Member of the U.S. Senate.

16.0 Natural Resource Trustee

16.1 Correspondence

1. Memorandum from Steven P. Farrick, EPA Region I to Sharon Christopherson, U.S. Department of Commerce National Oceanic and Atmospheric Administration (April 22, 1987).
2. Letter from Gordon E. Beckett, U.S. Department of the Interior to Steven P. Farrick, EPA Region I (July 21, 1987).
3. Letter from Kenneth Finkelstein, U.S. Department of Commerce National Oceanic and Atmospheric Administration to Steven P. Farrick, EPA Region I (September 21, 1987).

16.4 Trustee Notification Form and Selection Guide

1. Letter from Merrill S. Hohman, EPA Region I to Sharon Christopherson, U.S. Department of Commerce National Oceanic and Atmospheric Administration (July 1, 1987).
2. Letter from Merrill S. Hohman, EPA Region I to William Patterson, U.S. Department of the Interior (July 1, 1987).

17.0 Site Management Records

17.7 Reference Documents

1. "Recommended Agency Policy on the Carcinogenicity Risk Associated with the Ingestion of Inorganic Arsenic," EPA Headquarters (June 21, 1988).

**ADMINISTRATIVE RECORD INDEX AS SUPPLEMENTED PURSUANT  
TO THE FEBRUARY 26, 1990 ORDER ON REMAND**

**for the**

**Charles George Land Reclamation Trust Landfill NPL Site**

**(Operable Unit III)**

5.0 Record of Decision (ROD)

5.3 Responsiveness Summaries

1. Cross Reference: "Response to Technical Comments Received Pursuant to the February 26, 1990 Order On Remand," EPA Region I (October 1, 1990) [Filed and cited as entry number 1 in 5.3 Responsiveness Summaries of the Administrative Record as supplemented for the December 29, 1983 ROD].
2. Cross Reference: "Response to Comments Submitted by Ropes & Gray and Craig and Macauley," EPA Region I (October 1, 1990) [Filed and cited as entry number 2 in 5.3 Responsiveness Summaries of the Administrative Record as supplemented for the December 29, 1983 ROD].

5.4 Record of Decision (ROD)

1. Cross Reference: Letter from Michael J. Lack, Lack & Sragow (Attorney for Charles George Sr., Charles George Land Reclamation Trust, and Charles George Trucking Company, Inc.) to David J. Dickerson, EPA Region I (August 2, 1990). Concerning transmittal of attached comments on the remedy [Filed and cited as entry number 1 in 5.4 Record of Decision (ROD) of the Administrative Record as supplemented for the December 29, 1983 ROD].
2. Cross Reference: Letter from Stephen Wald, Craig and Macauley (Attorney for James George and Charles George Jr.) and Laurence M. Johnson, Johnson & Schwartzman (Attorney for Charles George Jr.) to David J. Dickerson, EPA Region I (August 3, 1990) with attached August 1990 "Review of Superfund Records of Decision," Haley & Aldrich, Inc. Concerning comments on EPA response actions [Filed and cited as entry number 2 in 5.4 Record of Decision (ROD) of the Administrative Record as supplemented for the December 29, 1983 ROD].
3. Cross Reference: Letter from Thomas H. Hannigan Jr., Ropes & Gray (Attorney for "Certain New Defendants") to David J. Dickerson, EPA Region I (August 3, 1990) with attached August 3, 1990 "Technical Comments on Remedial Actions," Dames & Moore and GEI Consultants, Inc. and August 3, 1990 "Comments of Certain New Defendants on EPA's Remedial Action Decisions," Ropes & Gray. Concerning remand comments [Filed and cited as entry number 3 in 5.4 Record of Decision (ROD) of the Administrative Record as supplemented for the December 29, 1983 ROD].

## 6.0 Remedial Design (RD)

### 6.1 Correspondence

1. Letter from D. Collier Jackson and Gary W. Rhodes, Law Environmental, Inc. to Robert Zaruba, U.S. Army Corps of Engineers (December 20, 1989). Concerning transmittal of the attached Minutes to the December 12, 1989 Charles George Landfill Phase III Preliminary Design Meeting.
2. Memorandum from David J. Dickerson, EPA Region I to Robert Zaruba, U.S. Army Corps of Engineers (January 12, 1990). Concerning Phase III Gas Treatment Design.
3. Letter from Dale C. Young, Commonwealth of Massachusetts Department of Environmental Protection to David J. Dickerson, EPA Region I (February 2, 1990). Concerning the attached December 19, 1989 comments on documents regarding the "Phase III Design Landfill Gas Treatment System at the Charles George Landfill" (October 1989).
4. Memorandum from Ann-Marie Burke, EPA Region I to David J. Dickerson, EPA Region I, (September 17, 1990). Concerning issues of concern with the updated risk assessment.

### 6.2 Sampling and Analysis Data

1. Memorandum from Dennisses Valdés, EPA Region I to David J. Dickerson, EPA Region I (February 15, 1989). Concerning Dunstable Brook sediment sampling results with attached:
  - Memorandum from Michael E. Dowling, EPA Region I to Dennisses Valdés, EPA Region I (January 11, 1989). Concerning analytical procedures and results of metals analysis in sediment.
  - Memorandum from Joseph Montanaro, Suresh Srivasatava, and Richard Siscanaw, EPA Region I to Dennisses Valdés, EPA Region I (February 14, 1989). Concerning gas chromatography-mass spectrometry analysis of extractable organics in soils and sediments.
  - Memorandum from Mary Jane M. Cuzzupe, EPA Region I to Ray Thompson, EPA Region I (January 23, 1989). Concerning purgeable organic analysis.
2. Memorandum from Dennisses Valdés, EPA Region I to Craig Dodson, EPA National Enforcement Investigations Center (June 23, 1989). Concerning the attached monitoring well sampling information and results.
3. Memorandum from Charles Aschwanden, EPA National Enforcement Investigations Center to Susana Cortina de Cardenas, EPA Region I (June 30, 1989). Concerning transmittal of the attached June 30, 1989 "Analysis Results from the Charles George Landfill Site, Tyngsborough, Massachusetts," EPA National Enforcement Investigations Center.
4. Letter from James W. Gallagher Jr., GEI Consultants, Inc. to David J. Dickerson, EPA Region I (September 13, 1990). Concerning preliminary data from ground water monitoring.

*The remaining Sampling and Analysis Data for the Remedial Design (RD) may be reviewed, by appointment only, through EPA Region I, Boston, Massachusetts.*

## 6.6 Work Plans and Progress Reports

1. "Final Draft - Ground Water Monitoring Work Plan," GEI Consultants, Inc. for Charles George Landfill Group (November 9, 1989).
2. "Final Draft - Leachate Treatability Work Plan," GEI Consultants, Inc. for Charles George Landfill Group (December 15, 1989).

## 7.0 Remedial Action (RA)

### 7.2 Sampling and Analysis Data

1. Memorandum from Dennisses Valdés, EPA Region I to David J. Dickerson, EPA Region I (November 9, 1989). Concerning the attached November 6, 1989 Data Validation package, Roy F. Weston, Inc.
2. Memorandum from Dennisses Valdés, EPA Region I to David J. Dickerson, EPA Region I (June 13, 1990). Concerning the attached May 1, 1990, May 8, 1990, and revised May 15, 1990 Data Validation packages, Roy F. Weston, Inc.
3. Memorandum from Dennisses Valdés, EPA Region I to David J. Dickerson, EPA Region I (August 15, 1990). Concerning the attached Revised July 24, 1990 water samples volatile organic analysis data validation package, Roy F. Weston, Inc.
4. Memorandum from Dennisses Valdés, EPA Region I to David J. Dickerson, EPA Region I (August 15, 1990). Concerning the attached Revised August 3, 1990 water samples metals analysis data validation package, Roy F. Weston, Inc.

*The remaining Sampling and Analysis Data for the Remedial Action (RA) may be reviewed, by appointment only, through EPA Region I, Boston, Massachusetts.*

## 10.0 Enforcement

### 10.7 EPA Administrative Orders

1. Administrative Order By Consent, *In the matter of Charles George Land Reclamation Trust Landfill, Tyngsborough and Dunstable Massachusetts*, Docket No. I-89-1054 (June 23, 1989).

## 13.0 Community Relations

### 13.4 Public Meetings

1. Cross Reference: Transcript, Public Meeting on the Order on Remand (May 23, 1990) [Filed and cited as entry number 2 in 13.4 Public Meetings of the Administrative Record as supplemented for the December 29, 1983 ROD].
2. Cross Reference: Transcript, Public Meeting on the Order on Remand (May 24, 1990) [Filed and cited as entry number 3 in 13.4 Public Meetings of the Administrative Record as supplemented for the December 29, 1983 ROD].
3. Cross Reference: Transcript, Public Meeting on the Order on Remand (May 31, 1990) [Filed and cited as entry number 4 in 13.4 Public Meetings of the Administrative Record as supplemented for the December 29, 1983 ROD].
4. Cross Reference: Transcript, Public Meeting on the Order on Remand (July 9, 1990) [Filed and cited as entry number 5 in 13.4 Public Meetings of the Administrative Record as supplemented for the December 29, 1983 ROD].

# Charles George Land Reclamation Trust Landfill

NPL Site  
Administrative Record  
(As supplemented pursuant to the  
February 26, 1990 Order on Remand)

Guidance Documents

Prepared for

Region I  
Waste Management Division  
U.S. Environmental Protection Agency

## GUIDANCE DOCUMENTS

EPA guidance documents may be reviewed at EPA Region I, Boston, Massachusetts.

### General EPA Guidance Documents

1. Comprehensive Environmental Response, Compensation, and Liability Act of 1980, amended October 17, 1986. [ C018 ]
2. Memorandum from Gene Lucero to the U.S. Environmental Protection Agency, August 28, 1985 (discussing community relations at Superfund Enforcement sites). [ C043 ]
3. Memorandum from J. Winston Porter to Addressees ("Regional Administrators, Regions I-X; Regional Counsel, Regions I-X; Director, Waste Management Division, Regions I, IV, V, VII, and VIII; Director, Emergency and Remedial Response Division, Region II; Director, Hazardous Waste Management Division, Regions III and VI; Director, Toxics and Waste Management Division, Region IX; Director, Hazardous Waste Division, Region X; Environmental Services Division Directors, Region I, VI, and VII"), July 9, 1987 (discussing interim guidance on compliance with applicable or relevant and appropriate requirements). [ C055 ]
4. "National Oil and Hazardous Substances Pollution Contingency Plan," Code of Federal Regulations (Title 40, Part 300), 1985. [ C043 ]
5. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Community Relations in Superfund: A Handbook (Interim Version) (EPA/HW-6), September 1983. [ C017 ]
6. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Draft Guidance on Remedial Actions for Contaminated Groundwater at Superfund Sites (OSWER Directive 9283.1-2), September 20, 1986. [ C022 ]
7. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Handbook: Remedial Action at Waste Disposal Sites (EPA-625/6-82-006), June 1982 (Revised October 1985). [ 2309 ]
8. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Superfund Federal-Lead Remedial Project Management Handbook (EPA/540/G-87/001, OSWER Directive 9355.1-1), December 1986. [ 2010 ]
9. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Superfund Public Health Evaluation Manual (OSWER Directive 9285.4-1), October 1986. [ 5014 ]
10. U.S. Environmental Protection Agency. Office of Ground-Water Protection. Ground-Water Protection Strategy, August 1984. [ 3405 ]
11. U.S. Environmental Protection Agency. Office of Research and Development, Office of Emergency and Remedial Response, and Office of Solid Waste and Emergency Response. Covers for Uncontrolled Hazardous Waste Sites (EPA-540/2-85-000), January 1985 (Revised September 1985). [ 2200 ]
12. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Data Quality Objectives for Remedial Response Activities: Development Process (EPA/540/G-87/003), March 1987. [ 2101 ]
13. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Guidance on Feasibility Studies under CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) (EPA/540/G-85/003), June 1985. [ C034 ]

14. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Guidance on Remedial Investigations under CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) (EPA/540/G-85/002), June 1985.
15. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Interim Guidance on Superfund Selection of Remedy (OSWER Directive 9355.0-19), December 24, 1986.

[C035]

[9000]