



EPA Proposes Change to Soil Cleanup Plan for Fletcher's Paint Superfund Site, Milford, NH

EPA Proposes Change to Address Soil Cleanup

Based on information collected over the past several years during the remedial design, the U.S. Environmental Protection Agency (EPA) is proposing a fundamental change to the Operable Unit 1 (OU1) remedy that was selected in the September 1998 Record of Decision.

The proposed change is only for that portion of the 1998 remedy which required the cleanup of principal threat soils (those with the highest contamination levels) through excavation and on-site treatment by low temperature thermal desorption (LTTD). The proposed change would allow for the excavation and disposal of roughly 28,000 cubic yards (cy) of highly contaminated soils at a licensed off-site landfill.

Since the 1998 remedy was selected, use of LTTD on this site is now more costly, and requires a longer treatment operation time period due to the limited space at the site for managing the contaminated soil.

The proposed change to off-site disposal (OSD) would achieve the same overall protection of human health and the environment by removing highly contaminated soil from the community. It would reduce the overall construction period and reduce the time until cleanup standards are met in soils. The overall cost of the soil cleanup action may be reduced by up to \$9 million.

You are Invited to Attend!

Two public meetings have been scheduled for the Fletcher's Paint Site. The first meeting will be a public information meeting to allow the community to learn more about this proposed change. Three weeks later we will hold a Public Hearing with a Formal Comment Session to give citizens the opportunity to enter official comments for the public record about this proposed plan.

Public Information Meeting

Tuesday, June 17, 2008

7:00 p.m.

**Milford Town Hall, One Union Square
Milford, NH**

Public Hearing

Tuesday, July 8, 2008

7:00 p.m.

**Milford Town Hall, One Union Square
Milford, NH**

Your Opinion Counts!!

EPA is accepting public comment on this cleanup proposal from June 18 through July 19, 2008. You do not have to be a technical expert to comment. If you have a concern or preference regarding EPA's proposed cleanup plan, EPA wants to hear from you before making a final decision on how to protect your community.

To provide formal comments, you may:

Offer oral comments during the public hearing on July 8, 2008

Or

Send written comments postmarked no later than July 19, 2008 to:

Cheryl Sprague, RPM
U.S. EPA Region I
1 Congress Street
Suite 1100 (HBO)
Boston, MA 02114-2023

Or

E-mail comments by July 19 2008 to:

sprague.cheryl@epa.gov

For further information about this meeting, call EPA Community Involvement Coordinator: Pam Harting-Barrat (617) 918-1318, or toll-free at 1-888-372-7341 ext. 8-1318.

We are seeking comments on whether to formally adopt a change to one component of the OU1 cleanup plan that addresses highly contaminated soil.

The OU1 soil cleanup plan was subject to public comment and was described in the September 1998 Record of Decision. The remainder of the 1998 OU1 Cleanup Plan will not be affected by this proposed change. Soil cleanup levels established to protect human health and the environment will remain as described in 1998, or as modified in the 1991 Explanation of Significant Differences. Low level contaminated soil that remains at the site will continue to have a cover placed over them to reduce infiltration and minimize future groundwater contamination. Natural attenuation will be allowed to reduce the groundwater contamination to cleanup levels set in 1998 Record of Decision, or as modified.

The Original OU1 Cleanup Plan

To mitigate existing and future potential threats to public health and the environment, remedial action objectives were developed for the OU1 soil cleanup plan to prevent contact with soil contamination; prevent leaching of soil contamination into groundwater above drinking water standards; prevent the ingestion of groundwater contaminated above drinking water standards; restore groundwater and prevent contaminants from migrating into the Souhegan River above surface water standards.

The OU1 Cleanup Plan, using treatment and containment, was documented in the September 1998 Record of Decision and was selected after public consideration of several cleanup alternatives including no action, limited action, capping (containment), off-site disposal, solvent extraction and low temperature thermal desorption.

Specifically, the 1998 OU1 Cleanup Plan included the following major components:

- **Treatment of the highly contaminated soils that present the highest risks to public health:**

Contaminated surface and subsurface soil at the Elm and Mill Street areas would be excavated and treated on-site at the Elm Street location, by low temperature thermal desorption and then placed back into the ground. Thermal desorption uses an indirect heat source to extract contamination from soil into vapors which are then cooled and concentrated into a liquid as part of the treatment process. The concentrated liquid generated by this treatment process would be shipped off-site for incineration at an appropriate facility. Untreatable and oversized debris materials would be sent off-site for disposal.

- **Cover the large volume (approximately 30,000 cy) of the remaining, less contaminated soil at the Elm Street area to promote drainage and prevent precipitation from reaching this soil and spreading contamination into the groundwater below.**
- **Monitor existing groundwater contamination while natural processes reduce the levels of contamination currently in groundwater to drinking water standards.**

Site Background

The first phase of the cleanup (OU1) at the site includes the former Fletcher's Paint Elm Street and Mill Street properties, a drainage ditch and adjacent properties (Figure 1 & 2, page 3).

Poly-chlorinated biphenyls (PCBs) have been identified as the major contaminant of concern at the site and have been found in soils, sediments and in groundwater. Groundwater contamination extends from the Mill Street area to the Souhegan River. Exposures to PCBs in soils and PCBs and Trichloroethylene (TCE) in groundwater present the highest risks to public health at the site.

The second phase of work (OU2) includes the Keyes Field groundwater and the Souhegan River. EPA has not yet selected a cleanup plan for this portion of the Site. EPA initiated investigations into potential river contamination in 2004 and is currently completing a baseline human health and ecological risk assessment related to exposures to contaminated sediment

in the river. EPA collected groundwater data from Keyes Field in 2007. The analysis of this data indicates that groundwater beneath the Keyes Field is now at or below drinking water standards.

Approximate OU1 Elm Street and Mill Street Areas for Cleanup

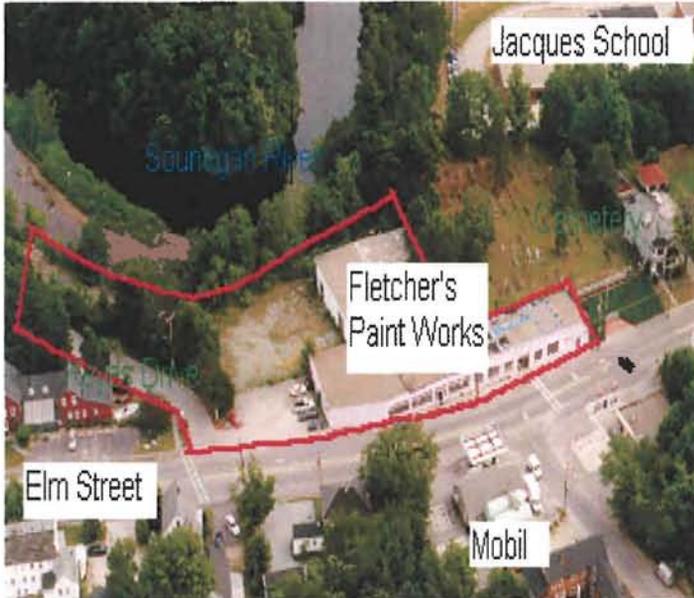


Figure 1: Elm Street Area



Figure 2: Mill Street Area

Site History

- A Town burning dump occupied a portion of the Elm Street area from 1929 - 1947.
- Fletcher's Paint manufactured and sold water based paints and solvent based stains from the Elm St. facility from 1949 - 1991.
- Sampling at the Keyes Municipal Well, a public supply well, indicated that the well was contaminated with Volatile Organic Compounds (VOCs) and was removed from service in 1984.
- EPA removed 863 drums containing hazardous substances from the Site in 1988 and placed a temporary cover on the PCB contaminated soils.
- EPA adds the Fletcher's Paint Works and Storage Facility on the National Priorities List (Superfund list) in March 1989.
- EPA conducted Remedial Investigations into the nature and extent of contamination and the risks posed by the Site from 1991 to 1994.
- EPA removed and disposed of 512 boxes and 99 additional drums of hazardous materials from site buildings and demolished and disposed of the Mill Street storage shed in 1993.
- In 1995, contaminated surface soil from several residential properties on Mill Street were excavated and disposed of off-site pursuant to an Order issued by EPA to a Potentially Responsible Party (PRP).
- A Record of Decision (ROD) was issued by EPA for the first phase of the cleanup, Operable Unit 1, in September, 1998.
- EPA demolished and disposed of the former Fletcher's Paint, Elm Street buildings in January 2001.
- EPA issued an Order for a PRP (General Electric) to perform the OU1 cleanup action in July, 2001. Pursuant to this Order, intermediate designs for both LTDD and OSD were submitted and reviewed by EPA in 2007.

Proposed Change to the OU1 Soil Cleanup Plan

The proposed change is very similar to the existing cleanup plan. It would achieve the same cleanup goals for PCBs in both the surface and subsurface soils through the excavation and removal of soils with the highest concentrations of PCBs. The main difference to the current soil cleanup plan is that the excavated soil would be loaded onto large trucks for transport and disposal off-site at a regulated landfill and clean fill would be brought to the site to fill the excavated areas.

The Proposed Soil Cleanup Plan Would Include:

- Excavation and off-site disposal of approximately 28,000 cy of highly contaminated soils to achieve the same 1998 ROD specified PCB soil cleanup levels of:

1 ppm PCB in the surface soil at Elm and Mill St;
1 ppm PCB in subsurface soil at Mill Street;
100 ppm PCB in the subsurface soil at Elm St.;
25 ppm PCB within the utility corridors at Elm St.

Excavation at both the Elm and Mill Street locations is expected to be performed concurrently; however at no time will the west bound lane of Route 101A and Mill Street be closed at the same time.

EPA estimates that the volume of soil requiring excavation to meet the soil cleanup standards noted above are as follows:

- 18,000 cy from the Elm Street area
 - 10,000 cy from the Mill Street area
- Once cleanup standards in soils are met, an additional 4,000 cy of soil would be excavated from the Elm Street area to construct the 40-inch thick, engineered soil cover system, as well as the utility and tree planting corridors. These lesser contaminated soils would be back-filled into the deeper excavations at the Elm Street area.

- Approximately 28,000 cy of clean materials would be brought in by truck for cap construction and site restoration, likely from a local source, and placed directly into the excavation or staged in a designated area prior to placement. Excavation equipment would transfer clean backfill into the excavation areas following confirmation that cleanup levels were achieved.
- Appropriate scheduling and staging of trucks would allow for direct loading of excavated soils and immediate transport off-site.
- The primary area for parking trucks waiting to be loaded with contaminated soil for off-site transport is located on Perry Street just off Route 101A. This Town owned lot can accommodate approximately 5 -10 trucks. Another 5-10 trucks could be parked on-site at Mill Street or on Keyes Drive. A secondary parking area, if needed, would be located off Heron Pond Road. (See maps of Truck Routes on the next page).
- It is estimated that the excavation and backfilling operations will be conducted over an approximately 110 day period and require approximately 5,600 truck trips (each leg of journey equals one truck trip). These trucks are expected to be large 20 cubic yard dump trailers.

Approximately 3,600 truck trips would be to/from the Elm Street area while approximately 2,000 truck trips are anticipated to/from the Mill Street area. This represents approximately 52 truck trips per day (or 26 trucks visiting the site per day) during the excavation and backfilling operations.

Over an 8-10 hour operation, this results in a total of approximately 6.5 truck trips per hour to/from the site during this portion of the cleanup. This increase in additional truck traffic is not expected to significantly impact the overall local traffic on or near Elm Street, as it represents an increase of 0.34% in typical traffic to the roughly 15,000 vehicles per day that cross through the Elm St/West St. intersection.

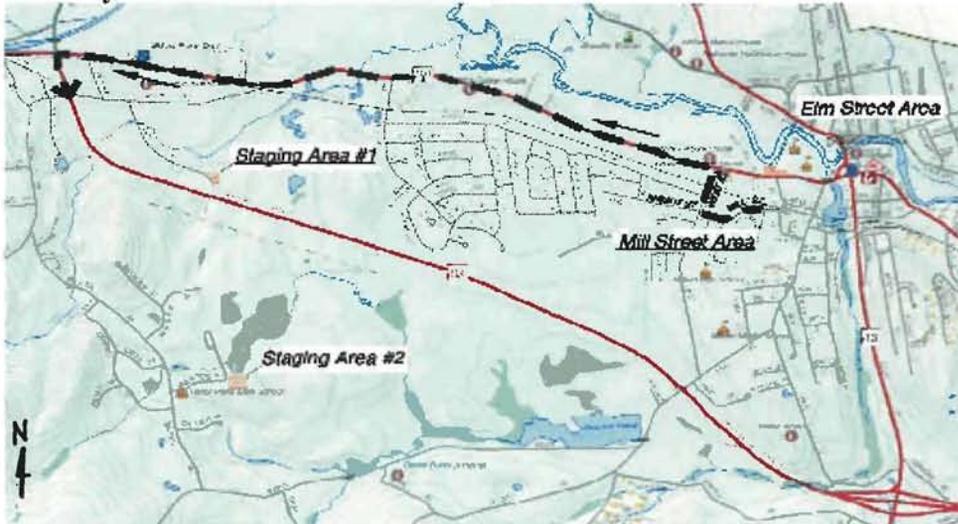
The primary transport routes to or from the site are recommended as follows:

- To the Elm Street Area - Traveling west on NH Route 101, turning east on Elm Street, turning north into the Elm Street Area;
- To the Mill Street Area - Traveling west on NH Route 101, turning east on Elm Street, turning south on West Street, turning east on Mill Street to the Mill Street Area;
- From the Elm Street Area - Exit the Elm Street Area traveling west on Elm Street, turning east on NH Route 101;
- From the Mill Street Area - Exit the Mill Street Area traveling west on Mill Street, turning north on West Street, turning west on Elm Street, turning east on NH Route 101;
- To Staging Area 1 - Trucks would follow the above two routes with the exception of turning east onto Old Wilton Road from NH Route 101, turning south on Perry Road to Staging Area 1 (which will only be used for trucks inbound to the site);
- To the Elm Street Area from Staging Area 1 - Traveling west on Perry Road, turning east on Old Wilton Road, turning east on Elm Street, turning north into the Elm Street Area; and
- To the Mill Street Area from Staging Area 1 - Traveling west on Perry Road, turning east on Old Wilton Road, turning east on Elm Street, turning south on West Street, turning east on Mill Street to the Mill Street Area.

Primary Truck Route - Elm Street Area



Primary Truck Route- Mill Street Area



Common Features to both the Low Temperature Thermal Desorption and Off-site Disposal Soil Cleanup Plans

- Cleanup of contaminated soils to the 1998 Soil Cleanup levels (see page 4) for the protection of human health.
 - Site preparation activities including tree removal, construction of temporary access roads, material and equipment staging areas and mobilization of equipment.
 - Excavation activities require the removal of the southern rail line at the Mill Street area, a two-phased excavation approach and diversion of road, railroad and pedestrian traffic.
 - Prior to excavation, a sheet pile and wooden lag support system would be installed to facilitate excavation of contaminated soils from deep areas. The deepest excavations at the Elm Street area will be 23 feet (which is at the water table) and 20 feet (top of bedrock) at the Mill Street area.
 - Excavation would proceed in two phases: 1) excavation to reach the 1998 soil cleanup levels; and 2) over-excavation required to construct the engineered soil cover system as well as the utility and tree corridors.
 - Dewatering, before and during excavation, will be required at the Mill Street area to lower the water table. This water will be treated on-site at the Mill Street area by filtration, air stripping, and carbon adsorption before being discharged to the Souhegan River.
 - Both plans include off-site disposal. The proposed change to OSD includes the excavation and off-site disposal of all 28,000 cy of excavated, contaminated materials. The current LTTD plan would require off-site disposal of approximately 10,000 cy of materials including roughly 3,000 cy of contaminated soils not amenable to treatment; over-sized debris, and roughly 7,000 cy of excavated, contaminated soils not needed as treated backfill in the construction of the low permeability soil cover.
 - Excavation activities will require closing Keyes Drive and a portion of Mill Street during construction as well as temporarily closing the west bound lane of Elm Street for limited excavation and immediate fill activities and repaving.
 - The small (1.6 acres) size and the need to perform excavation on all areas of the Elm Street property require the limited use of Keyes Field for office trailers and various clean operations. (See Figure 3, page 7).
- Keyes Field (other than those portions shaded in Figure 3, page 7) will be available for use during the construction. Pedestrian traffic may still use the footbridge and an alternative vehicle access to the park is being pursued by the Town.
- Transportation of clean soils and materials to the Elm Street area will be needed to construct a 40-inch thick, low permeability soil cover system (sand/gravel/topsoil). This soil cover system will prevent PCBs that remain at the site below cleanup levels from leaching into the groundwater above drinking water standards.
 - Air, dust and emission monitoring and controls during all construction and treatment operations.
 - Restoration activities.
 - Institutional controls to restrict disturbance of contaminated soils left in place and prevent ingestion of contaminated groundwater until cleanup levels are achieved.
- An important change incorporated into the remedial design of both the current LTTD and proposed OSD soil cleanup plans is the replacement of the asphalt cap, called for in the 1998 cleanup plan, at the Elm Street area with an equivalent, low permeability, engineered soil cover to minimize infiltration of precipitation and the continuous migration of contamination into groundwater while meeting the Town's future use goals.

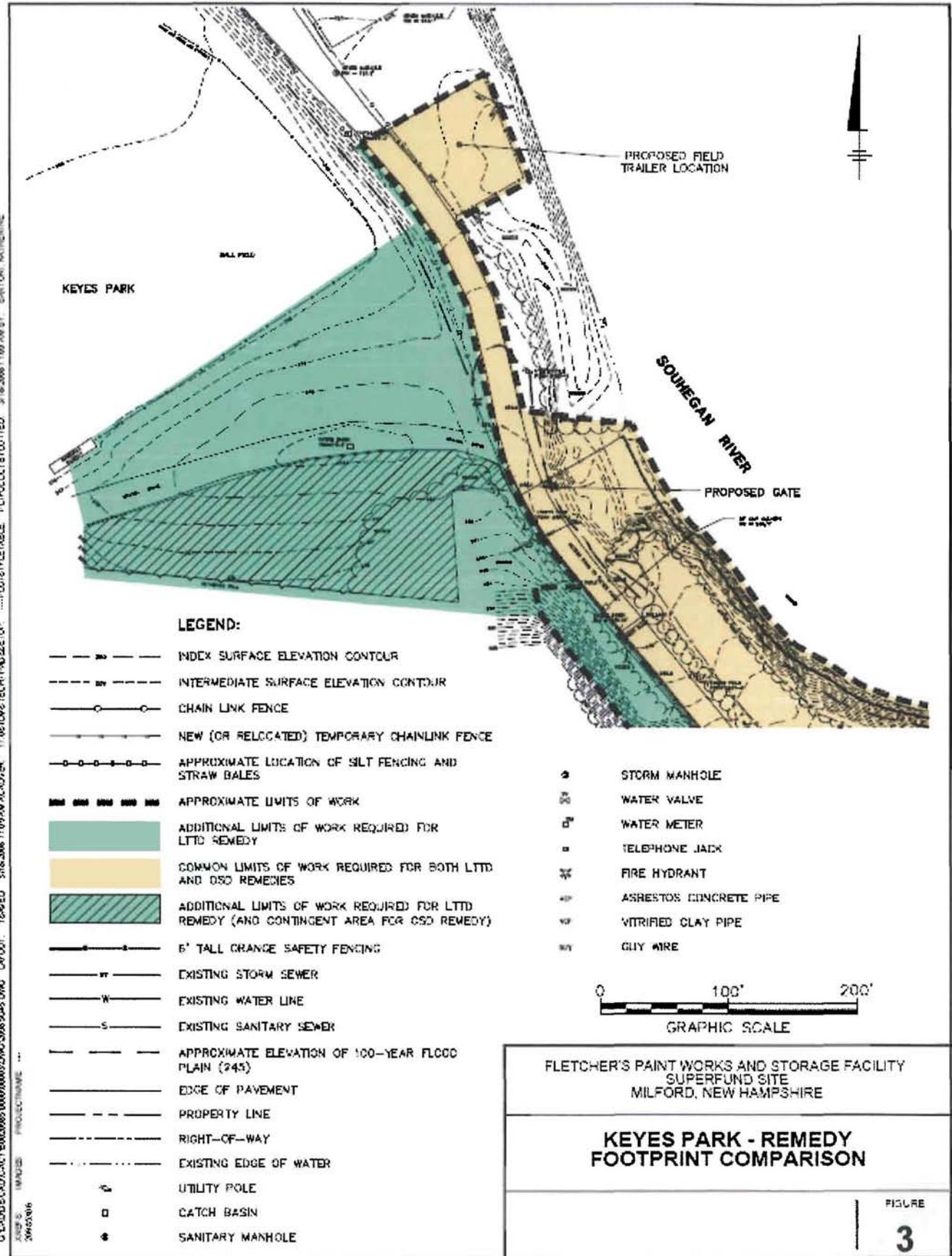


Figure 3: Comparison on Keyes Field areas needed to implement LTTD vs. OSD

Comparison of Baseline Construction Schedules*

<u>Major Construction Activity</u>	<u>Low Temperature</u>	<u>Off-Site Disposal</u>
Mobilization and Site Preparation Activities	2 to 3 months	2 to 3 months
Installation of Excavation Support Systems	3 to 5 months	3 to 5 months
Low Temperature Thermal Desorption (LTTD):		
Mobilization, set up, performance testing of LTTD	6 to 8 months	-----
Excavation, Full Scale Treatment of LTTD and backfilling: 12 hour days/ 6 days per week Feed rate: 12 tons per hour or 107 tons of soil treated per day	13 months to 20 months (including 3 month winter shut down)	-----
Off-Site Disposal (OSD):		
Excavation /Off-Site Disposal/concurrent back-filling: 10 hour days/6 days per week 15 Trucks loaded per day/20 cy size trucks or 450 tons/day disposed off-site	-----	4.5 to 9.5 months if Mill Street and Elm Street areas are excavated concurrently; 5.5 to 11.5 months if not.
Decontamination/demobilization	2.5 to 3.5 months	2 to 2.5 months
Site Restoration	4 to 6 months	4 to 6 months

<u>Total Estimated Duration</u>	30.5 to 44.5 months	15.5 to 26 months with concurrent excavation of Mill Street and Elm Street; 17.5 to 28 months if not.
<ul style="list-style-type: none"> Time frames are presented as a range to represent the baseline duration and potential schedule changes from volume increases, limitations, and operation issues. 		

New Information

This proposed OU1 soil cleanup plan change is based on new information collected during the remedial design phase, undertaken by General Electric. During the remedial design:

- Over 1,600 soil samples have been collected from the Elm Street area and over 800 soil samples were collected from the Mill Street area to better define the extent of contamination and to design the excavation activities.
- Comments from the Town on the initial LTTD design in 2005 resulted in a reduction in operating hours for LTTD from 24 hours per day, seven days per week (1998 ROD) to 12 hours per day, 6 days per week. This extended the overall schedule, operation and costs for the LTTD remedy.
- The Town also proposed a future use plan for the Elm Street area of the site to include a Memorial Town Park. As a result, changes to both the 2007 interim LTTD and OSD remedial designs included additional excavation for utility and tree planting corridors and construction of a 40-inch soil cover (as opposed to the asphalt cover required in the 1998 ROD) over remaining low level contamination.
- Interim remedial designs for both the LTTD and OSD were submitted for EPA review. These designs support that OSD would achieve the same level of protection and permanence as LTTD, is readily implementable, has a shorter duration for short term community impacts and is more cost-effective.

Nine Criteria Evaluation

In accordance with the National Contingency Plan (NCP), both soil cleanup plans were evaluated according to nine evaluation criteria. The evaluation of the first seven of the nine NCP criteria was performed in detail in a September 20, 2007 Technical Memorandum-Comparison of LTTD and OSD Remedies submitted by General Electric. State and Community Acceptance are reviewed following comment on the proposed cleanup plan change.

Overall Protection of Human Health and the Environment. This criterion assesses how well

an alternative, as a whole, achieves and maintains protection of human health and the environment.

Compliance with ARARs. This criterion assesses how the alternative complies with location-specific, chemical-specific, and action-specific ARARs, and whether a waiver is required or justified.

Long-term Effectiveness and Permanence. This criterion evaluates the effectiveness of the alternative in protecting human health and the environment after response objectives have been met. This criterion includes consideration of the residual risks and the adequacy and reliability of controls.

Reduction of Toxicity, Mobility, or Volume through Treatment. This criterion evaluates the effectiveness of treatment processes used to reduce toxicity, mobility, and volume of hazardous substances. It also considers the degree to which treatment is irreversible, and the type and quantity of residuals remaining after treatment.

Short-term Effectiveness. This criterion examines the effectiveness of the alternative in protecting human health and the environment during the construction and implementation of a remedy. It also considers the protection of the community, workers, and environment during implementation of remedial actions.

Implementability. This criterion assesses the technical and administrative feasibility of an alternative and availability of required goods and services. Technical feasibility considers the ability to construct and operate a technology, its reliability, the ease of undertaking additional remedial actions, and the ability to monitor the effectiveness of a remedy.

Cost. This criterion evaluates the capital cost, as well as the operation and maintenance costs.

State Acceptance. This criterion considers the state's preferences or concerns about the proposed change.

Community Acceptance. This criterion considers the community's preferences among or concerns about the alternatives.

Summary of Comparative Analysis

EPA evaluated both the current low temperature thermal desorption (LTTD) plan and the proposed change to off-site disposal (OSD) against seven of the nine evaluation criteria. The table on page 13 summarizes the evaluation for both plans.

Overall Protection of Human Health and the Environment.

Both plans provide the same overall protection of human health and the environment as both plans will achieve the same cleanup standards. Both cleanup plans will restore the site for future use.

Compliance with ARARs.

Both plans will comply with all state or federal requirements identified as applicable or relevant and appropriate. Most regulations apply to both cleanup plans as they contain the same major activities, however LTTD will also be required to meet additional requirements for thermal treatment operations.

Long-term Effectiveness and Permanence.

Both plans provide the same long term effectiveness and permanence because both plans effectively and permanently remove a large volume of highly contaminated soil from the site and prevent infiltration through the remaining low level of contamination. Additionally, once cleanup objectives are met, both plans require institutional controls to restrict access to the remaining lesser contaminated soils and ingestion of contaminated groundwater. OSD would place clean backfill over the remaining low level contaminated soils while LTTD treated soils that are backfilled may have minor residual PCB contamination. Both plans include long-term cap maintenance and groundwater monitoring.

Reduction of Toxicity, Mobility, or Volume through Treatment.

The current LTTD plan best satisfies this criteria as it provides for the reduction in the toxicity, mobility and volume of hazardous substances through treatment. Off- Site Disposal will reduce

the mobility of hazardous substances through placement in a secure landfill.

Short-term Effectiveness.

Short term impacts during both plans include increased truck traffic, the southern rail line removal at Mill Street, closure of a portion of Mill Street and Keyes Drive, visual, noise and dust impacts as well as traffic and pedestrian diversion. Short-term impacts are related to construction activity and the duration and magnitude of the impacts are related to construction time schedules.

Both plans include the continued use of Keyes Park but require the closure to Keyes Drive and limited use of the southeast corner of Keyes Park (see Figure 3. page 7) to manage materials and equipment. A footbridge is available for pedestrian access and an alternative, temporary vehicle access west of Keyes Park is being pursued by the Town.

Typical construction activities will be visible to the community during the implementation of both plans given the location of the site. Cranes, pile drivers, a slurry plant, excavators, front-end loaders, water treatment operations, water storage tanks, compaction equipment and small and large trucks will be used in both cleanup plans.

The LTTD treatment facility would be located between Keyes Drive and the Souhegan River and generally consists of three tractor trailer components (which house air emission controls, indirect heating of soils vessel, controls, stack, cooler, collection equipment and generators), and occupy a space of about one-third of an acre. Stockpiles of treated soils are also associated with the LTTD plan. Jersey barriers, fencing and screens would be used to limit visual impacts, access and mitigate dust.

Both plans will generate construction noise associated with sheet pile installation, excavation, treatment, backfilling and restoration. The sheet pile installation will take 3 to 5 months and will generate loud repetitive sounds due to pounding and vibration of the sheet piles. LTTD is expected to operate 12 hours per day/ 6 days per week and some noise will result from treatment operations.

Both plans will generate some dust, odors and emissions resulting from a number of sources. Real-time air monitoring will be performed to measure dust, particulates, and volatile organics. Engineering controls will be used if needed to mitigate dust and odors.

Both plans will result in an increase in local truck traffic. The impacts from truck traffic under both plans are more fully described below:

Low Temperature Thermal Desorption: It is anticipated that approximately 5,350 truck trips are associated with the current LTTD plan. These trips (61%) are largely short distance trips moving material between the Elm and Mill Street areas using small, 10-cy dump trucks. The remaining 39% represent trucks leaving Milford to dispose of materials or bringing in the off-site backfill. Under the LTTD schedule estimate, this traffic will primarily occur during excavation/treatment/backfill operations estimated at about 460 working days and an average of 12 truck trips (or 6 trucks) per day

over an 13 month period (including a 3 month winter shutdown period).

Off-site Disposal: It is estimated that approximately 5,600 truck trips will be required to implement the OSD plan. All of these truck trips represent trucks entering and leaving Milford using large, 20-cy trucks. Under the OSD schedule estimate, this traffic will occur primarily during excavation, handling, and off-site transportation/disposal operations estimated at 110 working days, with an average of 52 truck trips (or 26 trucks) per day over a 4 month time period.

Implementability.

Both plans are technically and administratively implementable. OSD would be less complicated to implement and trucking and landfilling services are more readily available than a small scale LTTD treatment unit which would be needed to operate in the limited area along Keyes Drive.

Cost Comparison

Major Construction Activity	Current LTTD Plan	Proposed OSD Plan
General Site Preparation	\$2,940,000	\$1,590,000
Installation of Excavation Support Systems	\$5,600,000	\$5,600,000
Excavation, Handling and Treatment/Disposal	\$16,420,000*	\$10,210,000
Site Restoration	\$1,320,000	\$1,520,000
Other	\$2,520,000	\$1,030,000
Total	\$28,800,000*	\$19,950,000

* This cost includes treatment of approximately 7,400cy of contaminated soil that would not be backfilled on-site, but disposed off-site to allow construction of the soil cover at the current grade. A cost savings of approximately \$2.0 million could be achieved through the excavation and off-site disposal of these soils without treatment.

Summary of Evaluation of Cleanup Criteria

Evaluation Criteria	Current LTTD Plan	Proposed OSD Plan
Overall Protection of Human Health and the Environment	✓	✓
Compliance with ARARs	✓	✓
Long-term Effectiveness and Permanence	✓	✓
Reduction of Mobility, Toxicity or Volume through Treatment	✓	✓
Short-term Effectiveness	✓	✓
Implementability	✓	✓
Cost * (See cost table above)	\$28,800,000*	\$19,950,000
State Acceptance	Will be evaluated after the comment period	
Community Acceptance	Will be evaluated after the comment period	

✓ Partially meets criterion

✓ Meets or exceeds criterion

How You Can Comment On EPA's Proposal to Change the OU 1 Soil Cleanup Plan

During the 30-day public comment period that begins on June 18, 2008 and ends on July 19, 2008, EPA will accept comments on the proposed change to the OU1 soil cleanup plan. EPA will hold a public hearing on July 8, 2008 to provide an opportunity for the public to state their comments into the official record. EPA uses this public input to improve the cleanup proposal. Your formal input and ideas will become part of the Administrative Record. There are three different ways in which individuals can provide their comments on this Proposed Plan:

- ◆ Comments can be submitted in writing to EPA before July 19, 2008.
- ◆ Comments can be sent to the EPA Remedial Project Manager by email to: sprague.cheryl@epa.gov by July 19, 2008.
- ◆ Comments can be spoken into the official public record during the public hearing that will occur on July 8, 2008.

EPA encourages anyone with a concern or who favors the proposed cleanup plan change to express his or her opinion during the comment period. All comments are welcome. Any of the three mechanisms above are acceptable for providing comments.

Two types of public meetings will occur with respect to the proposed soil cleanup plan change; the public informational meeting on June 17, 2008 and a public hearing on July 8, 2008. The June 17th meeting will be an informational session to explain the proposed changes to the soil cleanup plan and answer questions informally. Comments that are made during this meeting will not be part of the official record. The second meeting, a public hearing, will provide an opportunity for the public to speak comments into the official record. A stenographer will be present to record all of the comments offered during the public hearing. Time for comments will be limited in order to allow all individuals present to have an opportunity to speak their comments into the record. EPA does not respond to any comments made at the public hearing other than to request clarification. At the close of the formal comment session, EPA will be available to answer questions again informally.

The comment period will last for thirty days unless an extension is requested. Once the comment period is complete, EPA will assemble and evaluate all of the submitted comments. Appropriate revisions to the proposal to change the OU1 soil cleanup plan may be made based on these comments. EPA will sign an amendment to the OU1 Record of Decision, if a change is appropriate and document the responses to public comment in a document called the responsiveness summary. The ROD Amendment, if appropriate and a summary of responses to public comments will become part of the Administrative Record for OU1 and will be made available to the public at the Wadleigh Memorial Library and the EPA Records Center in Boston. If a change to the proposed soil cleanup plan is not deemed appropriate, EPA will document such a decision for the Administrative Record.

After the final decision is made on the OU1 soil cleanup plan, EPA will complete its review, comment and approval on the final designs for the cleanup. The remedial action phase will follow with the review and approval of remedial action work plans, construction plans and the procurement of contractors, prior to the initiation of construction activity.

For More Information about the Cleanup:

All of the technical and public information publications prepared to date for the site are available for public review at the following locations:

EPA Records Center
1 Congress Street, Suite 1100
Boston, MA 02114-2023
(617) 918-1453
Hours: 10:00 a.m.-noon, 2:00 p.m.-5:00 p.m.

Wadleigh Memorial Library
49 Nashua Street
Milford, NH 03055
(603)673-2408
Hours: 9:30 am-8:30 pm M-Th
9:30 am- 1:00 pm Friday
9:00 am – 1:00 pm Sat

A copy of all the major reports for the Fletcher's Paint Site is also available through the NHDES's One Stop web site:

<http://des.nh.gov/onestop/>

NH DES Site ID for Fletcher's Paint: 198506001
Project #: 3576

NHDES Contact: Tom Andrews
Email: ThomasAndrews@des.state.nh

Mailing list additions, deletions or changes

If you did not receive this through the mail and would like to

- be added to the site mailing list Name _____
- note a change of address
- be deleted from the mailing list Address: _____

Please check the appropriate box and fill in the correct address information above.

Fold, staple, stamp, and mail-----

Place
Stamp
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**Cheryl Sprague
Remedial Project Manager
U.S. Environmental Protection Agency
Region I (HBO)
1 Congress Street, Suite 1100
Boston, MA 02114 -2023**

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ENVIRONMENTAL
PROTECTION AGENCY
REGION I

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Boston, MA 02114-2023

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