EPA Superfund
Explanation of Significant Differences

Fletcher's Paint Works and Storage Facility
Superfund Site

EPA Site ID No: NH001079649
Operable Unit 1
Milford, New Hampshire
September, 2010

Second Explanation of Significant Differences
Fletcher's Paint Superfund Site OU1
September, 2010

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DECLARATION FOR THE SECOND EXPLANATION OF SIGNIFICANT DIFFERENCES

FLETCHER'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE, OU1 MILFORD, NEW HAMPSHIRE

SITE NAME AND LOCATION

Fletcher's Paint Works and Storage Facility Superfund Site
Operable Unit 1
Milford, New Hampshire

STATEMENT OF PURPOSE

This decision document sets forth the basis for the determination to issue the attached Explanation of Significant Differences (ESD) for the Fletcher's Paint Works and Storage Facility Superfund Site (the Site), Operable Unit 1 (OU1), in Milford, New Hampshire.

STATUTORY BASIS FOR ISSUANCE OF THE ESD

Section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9617(c), requires that if the remedial action being undertaken at a site differs significantly from the Record of Decision (ROD), as amended, for that site, EPA shall publish an explanation of the significant differences between the remedial action being undertaken and the remedial action set forth in the ROD, as amended, and the reasons such changes were made. Section 300.435(c) of the National Contingency Plan (NCP), and EPA Guidance (Office of Solid Waste and Emergency Response (OSWER) Directive 9355.3-02), indicate that an ESD, rather than a ROD amendment, is appropriate where the adjustments being made to the ROD are significant but do not fundamentally alter the remedy with respect to scope, performance, or cost. Because the adjustments to the 1998 ROD, 2001 ESD, and 2009 ROD Amendment, as provided in this ESD are significant but do not fundamentally alter the overall OU l remedy for the Fletcher's Paint Superfund Site with respect to scope, performance, or cost, this ESD is properly issued.

In accordance with Section 300.435(c) of the NCP, this ESD and supporting documentation will become part of the Administrative Record which is available for public review at both the EPA Region I Record Center in Boston, Massachusetts and the Wadleigh Memorial Library in Milford, New Hampshire.

OVERVIEW OF THE ESD

Summary of the Selected Remedy

The 1998 ROD, 2001 ESD, and 2009 ROD Amendment for this Site set forth the selected remedy for Operable Unit One (OU1) at the Fletcher's Paint Site. The selected remedy involves the excavation and off-site treatment and/or disposal of approximately 28,000 cubic yards of primarily PCB contaminated soil, the use of clean soil and consolidated lesser contaminated soil to backfill the excavated areas, and restoration and construction of a low permeability, engineered soil cover over the residual low-level threat wastes at the Elm Street area of the Site. The selected remedy also includes monitored natural attenuation of the contaminated groundwater in the overburden and bedrock aquifers and institutional controls to prevent future ingestion of contaminated groundwater, as well as restrictions on the use and access to the subsurface soil at the Elm Street area of Site.

Description of Significant Differences

After the September 30, 1998 OU l ROD was issued, the Safe Drinking Water Act Maximum Contaminant Level (MCL) for arsenic was revised from 0.05 mg/l to 0.010 mg/l. The 1998 ROD required that groundwater at the Site would be returned to drinking water standards through source removal and monitored natural attenuation. Federal and State drinking standards were identified as requirements that should be met at the time the cleanup is complete.[1] This ESD sets forth a change in the Interim Cleanup Levels established for the Site to include the arsenic drinking water standard of 0.01 mg/l (10 ug/l) or background, which ever is higher.

The groundwater cleanup level for manganese in the 1998 ROD was set at 0.18 mg/l (180 ug/l). Since then, EPA has issued a lifetime Health Advisory for manganese which increases the standard to 0.3 mg/l (300 ug/l). EPA Health Advisories provide information on contaminants that can cause human health effects and are known or anticipated to occur in drinking water. Health Advisories are guidance values based on non-cancer health effects for different durations of exposure (e.g., one-day, ten-day, and lifetime). This ESD changes the Interim Cleanup Level for manganese in groundwater consistent with this Health Advisory.

SUPPORT AGENCY COMMENTS

The State of New Hampshire has participated with EPA in reviewing the modification to the groundwater cleanup levels language for the remedy which is described herein and concurs with this ESD. The State of New Hampshire's concurrence will be included in the administrative record supporting this ESD.

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[1] Interim Cleanup Levels for groundwater under the 1998 ROD also include all Federal and State drinking water standards as they were identified as applicable or relevant and appropriate requirements (ARARs) for this Site.

DECLARATION

For the foregoing reasons, by my signature below, I approve the issuance of this Second Explanation of Significant Differences for the Fletcher's Paint Works and Storage Facility Superfund Site in Milford, New Hampshire, and the changes stated herein.

9/30/10
Date

James T. Owens, III, Director
Office of Site Remediation and Restoration
U.S. Environmental Protection Agency
Region 1, New England

SECOND EXPLANATION OF SIGNIFICANT DIFFERENCES

FLETCHER'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE, OU1 MILFORD, NEW HAMPSHIRE

I. INTRODUCTION

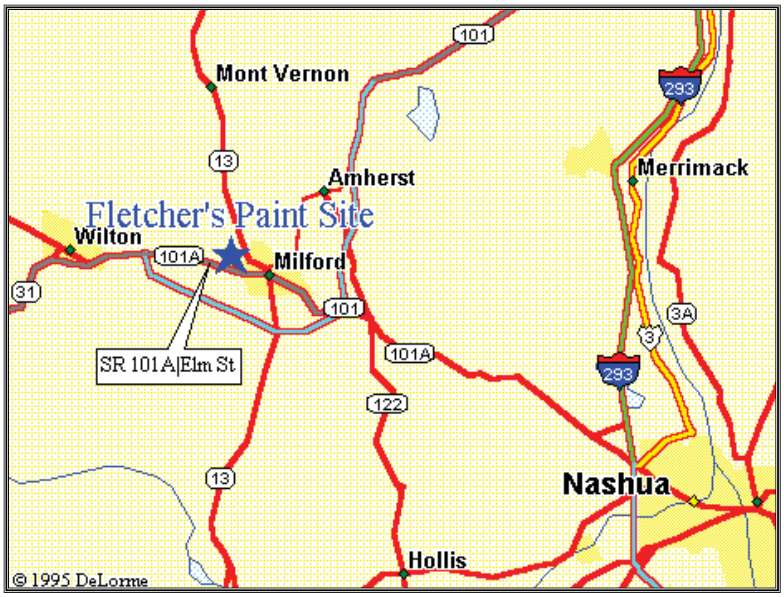
A. Site Name and Location

Site Name: Fletcher's Paint Works and Storage Facility Superfund Site

Site Location: Milford, New Hampshire in Hillsborough County

CERCLIS ID No: NHD001079649

SITE LOCATION: The Fletcher's Paint Site is situated in southeastern New Hampshire, Hillsborough County, Milford, New Hampshire. The Site is located approximately one-eighth of a mile from downtown Milford, along Route 101A (Elm Street).



The Site proper consists of two former Fletcher's Paint properties (located on Elm and Mill Street) which are situated approximately 700 feet apart and also includes a drainage ditch which runs from the most southern of the properties to the north and discharges into the adjacent Souhegan River. The Elm Street area is bounded to the north by the Souhegan River, to the east by a historical cemetery, to the south by Route 101A and to the west by Keyes Drive. The former Keyes municipal water supply well lies approximately 500 feet west of the Site, in the nearby Keyes Recreational Field.

Groundwater contamination currently extends from the Mill Street area of the Site, through the Elm Street area of the Site and north to the Souhegan River.

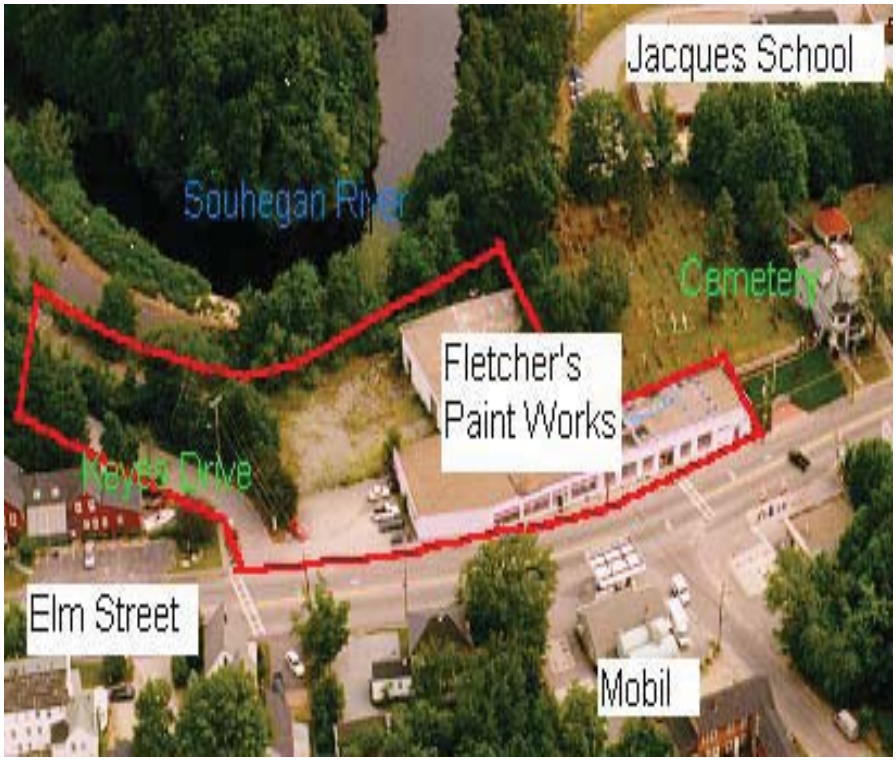


Figure 2: The Elm Street Area of the Site

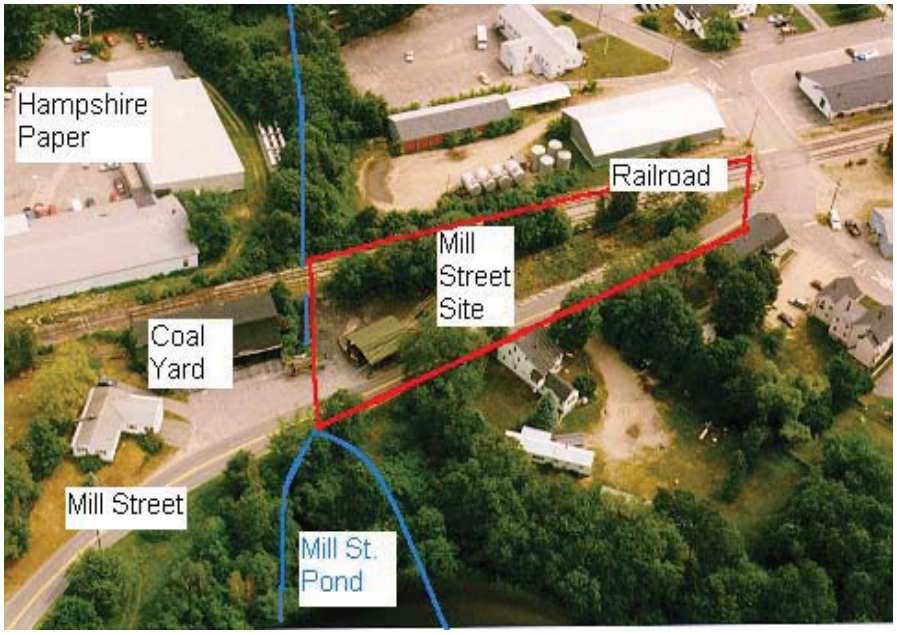


Figure 3: The Mill Street Area of the Site

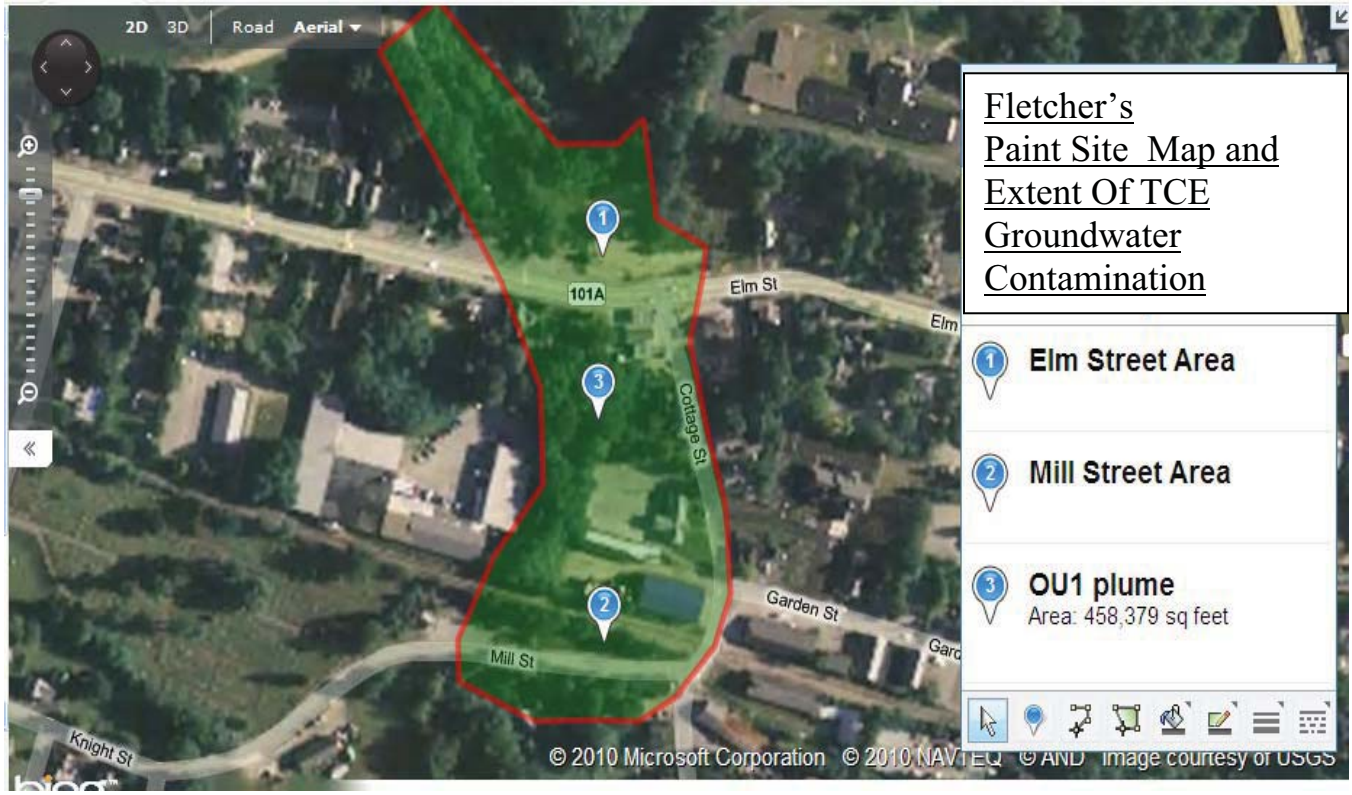


Figure 4: Extent of TCE groundwater contamination at the Site

B. Lead and Support Agencies

Lead Agency: United States Environmental Protection Agency

Support Agency: New Hampshire Department of Environmental Services

C. Legal Authority

Under Section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9617(c), Section 300.435(c) of the National Contingency Plan (NCP), 40 C.F.R. § 300.435(c), and U.S. Environmental Protection Agency (EPA) guidance (Office of Solid Waste and Emergency Response [OSWER] Directive 9355.3-02), if EPA determines that differences in the remedial action significantly change but do not fundamentally alter the remedy selected in the Record of Decision (ROD), as amended, with respect to scope, performance, or cost, EPA shall publish an explanation of the significant differences between the remedial action being

undertaken and the remedial action set forth in the ROD, or its amendment, and the reasons such changes are being made.

D. Summary of Circumstances Necessitating this Explanation of Significant Differences

This ESD addresses the Interim Cleanup Levels set forth in the 1998 ROD for groundwater and is necessary to reflect changes to drinking water standards for manganese and arsenic since the 1998 ROD.

E. Availability of Documents

This Explanation of Significant Differences (ESD) and supporting documentation shall become part of the Administrative Record for the Site. The ESD, supporting documentation for the ESD, and the Administrative Record are available to the public at the following locations and may be reviewed at the times listed below:

U.S. Environmental Protection Agency
Records Center
5 Post Office Square
Boston, MA 02109-3912
(617) 918-1440
Weekdays from 10:00 a.m. to 1:00 p.m.,
and from 2:00 p.m. to 5:00 p.m.
http://www.epa.gov/region01/superfund/resource/records.htm

Wadleigh Memorial Library
49 Nashua Street
Milford, NH 03055
(603) 673-2408
Mon-Thurs: 9:30 am to 8:30 pm; Fri: 930 am to 5:00 pm,
Sat. 9:00 am to 1:00 pm;
Sun. 1:00-5:00 pm
wadleigh@wadleigh.lib.nh.us

II. SUMMARY OF SITE HISTORY, CONTAMINATION AND SELECTED REMEDY

Commercial and light industrial use at the Fletcher's Paint facilities dates back to the late 1700s and the land has been used for such activities as carriage painting, a blacksmith shop, an armory, a car dealership, a Town burning dump, a paint manufacturing and retail facility, and a consignment shop.

The primary 2-acre areas of the Site consist of two lots formerly owned by Fletcher's Paint Works: a former paint manufacturing plant/retail outlet on Elm Street and a storage shed area 700 feet south on Mill Street. Fletcher's Paint Works manufactured and sold paints and stains for mainly residential use.

Fletcher's Paint Works operated at the Site from approximately 1948 until 1991. Bulk paint pigments, drums and miscellaneous materials were stored on the properties. During operation of the paint facility, hundreds of drums were stored in, beside and behind the plant, and naphtha and mineral spirits were stored in underground tanks. Hundreds of drums of scrap pyranol were also stored at the Mill Street property. During this time period, hundreds of drums of hazardous substances were stored outside at both the Elm and Mill Street areas. Spills, leaks, manufacturing operations, and dust suppression activities led to the current contamination of the soil at the Site.

In 1982, the State inspected the Elm Street facility in response to a complaint and found 800 drums of alkyd resins and 21 drums of solvent. Leaking and open drums, as well as stained soil, were observed. An EPA investigation of the Site was prompted by the discovery of VOC contamination in the adjacent Keyes Municipal Water Supply Well. Drums were removed from the Elm Street facility, and a permeable synthetic liner and clean fill were placed over the soil containing high levels of polychlorinated biphenyls (PCBs) at both the Mill Street and Elm Street locations.

By the end of 1991, EPA had a fence built around the Elm Street property. The storage shed on Mill Street and its contents, along with the contents left inside the Elm Street property when the business shut down, were properly disposed of during the summer of 1993 due to deteriorating conditions and concerns by local citizens. In 1995, PCB contaminated surface soils were removed from three residential properties adjacent to the Mill Street area. Asphalt was also placed over Mill Street to direct future run-off away from these residential properties. In 1996, contaminated soils were removed from a small piece of land adjacent to the Elm Street facility to allow for construction of a Korean War Memorial. In December 2000, EPA demolished and disposed of the former Fletcher's Paint Works building on the Elm Street property and covered the area with sand. The building was vacant, in deteriorating condition and presented concerns for public safety given its location adjacent to the sidewalk and Route 101A. The demolition action was completed in the spring of 2001.

B. Contamination at the Site

PCBs, the primary contaminant at the Site, were brought to the Site from approximately 1948 until 1967 in a material called scrap pyranol from the General Electric facilities in Pittsfield, Massachusetts, Hudson Falls and Fort Edward, New York. This scrap pyranol was a waste liquid, which generally contained PCBs, Trichloroethylene (TCE) and 1,2,4-Trichlorobenzene (TCB) as well as small amounts of other compounds. A small amount of waste PCB material also came from the Sprague Electric Company and the Aerovox Company.

As a result, PCBs and other contaminants were released to the environment and are found at concentrations in Site soil, sediments, and groundwater at levels that pose an unacceptable risk to human health and the environment. Additional details on the Site history and the characterization of the contamination at the Site can be found in the 1998 ROD and the 2009 Pre-Design Investigation Report.

The most prevalent hazardous substance found at the Site was PCBs. In general, where high levels of PCBs are found in the soils at the Site, TCE and TCB was also found. The RI and Pre-Design investigations revealed that in addition to overall surficial PCB contamination in the soil as a result of dust suppression and related activities at the Site, the highest and deepest concentrations of PCB contamination directly correspond to former drum storage areas of the Site. To a lesser extent, other hazardous materials found at the Site during the RI included volatile organic compounds (VOCs) such as xylene, ethylbenzene, toluene and TCE; metals such as lead, chromium, antimony and barium; and semivolatile organic compounds (SVOCs) such as TCB, phthalates and polycyclic aromatic hydrocarbons (PAHs).

Groundwater contamination at the Site primarily includes TCE, TCB, PCBs, DCA, benzene, xylene, ethyl benzene, and toluene. Contaminants from the Mill Street area were also found in a nearby drainage ditch and wetland adjoining the Site and the nearby Hampshire Paper Company property.

In the October 2009 monitoring of Site groundwater, arsenic was detected in 5 of the 50 wells and all detections had concentrations less than the drinking water standard of 10 ug/l. The concentrations found ranged from 5.6 ug/l to 9.4 ug/l.

In the April 2010 monitoring of Site groundwater, manganese was detected in 39 of the 43 wells at concentrations ranging from 2.2 ug/l to 709 ug/l. Manganese was detected in nine wells greater than the 1998 Interim Cleanup Level and in four wells greater than the 300 ug/l Health Advisory. Three of these wells are generally located on the boundaries of the groundwater plume, with little to no other detectable Site contaminants (locations MW-30C, MW11-A, and 11-C). A bedrock monitoring well (MW-22C) located on the Mill Street area, is the exception, as it is within the plume and also has PCB, TCE, and TCB contamination. The monitoring well which previously had the highest manganese concentrations is located at the former Draper/Mobil Gas station just south of the Elm Street area. This monitoring well was not sampled in 2010 due to a diesel spill and noted product within that well.

C. Summary of the Selected Remedy

The 1998 ROD, the 2001 ESD, and the 2009 ROD Amendment for this Site set forth the selected remedy for Operable Unit One (OU1) at the Fletcher's Paint Site. The selected remedy involves the excavation and off-site treatment and/or disposal of the PCB contaminated soils, some consolidation of excavated, lesser contaminated soils, the use of clean fill as backfill at the Site, and the construction of a low-permeability, 40-inch engineered soil cover over the residual low-level threat wastes. The selected remedy also includes monitored natural attenuation of the contaminated groundwater in the overburden and bedrock aquifers and institutional controls to prevent future ingestion of contaminated groundwater, as well as restrictions on the use and access to the subsurface soil at the Elm Street area.

The selected remedy includes these major components:

Mill Street

- Excavation of surface soils (0 to 1 foot) at the Mill Street area to a depth of 1 foot wherever PCB concentrations are greater than 1 mg/kg PCB.

- Excavation of subsurface soils at the Mill Street area (1 to 20 feet (bedrock) below surface) wherever PCB concentrations remain that exceed 1 mg/kg PCB.

- Water collected from the dewatering of the excavated soils and water collected as a result of lowering of the water table to conduct the excavation would be either treated on-site in a mobile unit and appropriately discharged to the Souhegan River or sent off-site to a treatment facility.

- Backfilling of clean materials into the excavated areas to restore the property consistent with the anticipated future use of the Site. A portion of the Mill Street area would be paved, physically re-aligning Mill Street. The pavement would reduce infiltration of precipitation, control erosion, and promote drainage away from the residential properties.

- Re-grading and repair of the storm drainage ditch system, as necessary, to promote surface water flow away from the Site. Erosion control measures shall be incorporated into the final drainage system to prevent erosion or debris from restricting future storm water flow from the Mill Street area or filling in of the drainage ditch.

Elm Street

- Excavation of surface soils at the Elm Street area to a depth of 1 foot wherever PCB concentrations are greater than 1 mg/kg PCB.

- Excavation of subsurface soils, within utility corridors, at the Elm Street area

wherever PCB concentrations are greater than 25 mg/kg PCB.

- Excavation of remaining subsurface soils to the seasonally low water table wherever PCB concentrations remain that exceed 100 mg/kg.

- Removal and disposal of the remaining 3 underground storage tanks located on the Fletcher's Elm Street property.

- Final grading, restoration, and landscaping of the Site. The final cover would promote drainage and further minimize infiltration through the residual contamination at the Site and be part of the final restoration and landscaping plan. Erosion control measures would be incorporated into the final grading to prevent erosion of the cover materials off-site and into the Souhegan River.

- Institutional controls would be implemented to prevent unauthorized access into the subsurface. Deed restrictions and/or notices would also have to be issued to restrict future use of the Site, or the modification of the cover or surface drainage structures in ways inconsistent with this remedy or the anticipated future use of the Site.

Groundwater

- Establish a Groundwater Management Zone (GMZ) under NH's Comprehensive Groundwater Policy. The GMZ sets boundaries within which groundwater will be monitored over time to ensure that the contaminant concentrations are decreasing; to ensure that the remaining contamination has not migrated beyond the established boundaries or impacted the Souhegan River; and that the remedial action cleanup is working and remaining effective over time. Institutional controls would have to be implemented to restrict the use of the groundwater within the GMZ, while contaminant concentrations are in excess of drinking water standards. Further action may be necessary consistent with the NH Comprehensive Groundwater Policy.

- Interim Groundwater Cleanup Levels must be achieved within the GMZ and maintained for a period of three consecutive years. A risk assessment will be performed on residual groundwater contamination to determine protectiveness of the remedy. If EPA determines the remedy is not protective, the remedial action shall continue until protective levels are achieved and not exceeded for three years or until the remedy is deemed protective or is modified.

III. DESCRIPTION OF SIGNIFICANT DIFFERENCES

EPA completed an amended baseline Human Health Risk Assessment in 1996. In 1997 NHDES completed a groundwater use and value determination for the Fletcher's Paint Site, and determined that the groundwater in the vicinity of the Fletcher's Paint Site is Medium Use and Value. This determination supported the selection of a groundwater remedy that restores groundwater quality to Federal and State drinking water standards through natural attenuation while managing the plume within a Groundwater Management Zone.

Interim Cleanup Levels were established in the 1998 ROD for the compounds of concern in the groundwater at that time, which exhibited an unacceptable cancer risk and/or non-cancer effects.[2] The 1998 ROD assumed residential wells could be installed at the Fletcher's Paint Site; therefore future risks associated with future ingestion of groundwater were calculated and cleanup levels established accordingly.

The estimated total incremental cancer risks for groundwater exposure at the time of the ROD were 1×10^{-3} for the average scenario and 3×10^{-2} for the RME (reasonable maximum exposure) scenario. The highest risks from groundwater were from benzene and PCBs. These exceed EPA's acceptable risk range of 1×10^{-4} to 1×10^{-6}.

The non-cancer hazard indices for adult residences were 18 for the average case scenario and 381 for the RME scenario. These exceed EPA's goal of a total hazard index at or below 1.

The 1998 ROD determined that actual or threatened releases of hazardous substances from the Site, if not addressed by implementation of the response action selected (and as amended), may present an imminent and substantial endangerment to public health, welfare, or the environment. The ROD further determined that exposure to groundwater exceeded EPA's cancer and non-cancer risk range of concern. The remedial action objectives for the Site groundwater therefore included preventing the ingestion of groundwater in excess of Federal and State drinking water standards and site-specific risk based standards; and restoration of groundwater to drinking water standards, or more stringent risk based standards.

Because the aquifer under the Site is a Class IIB aquifer, which is a potential source of drinking water, MCLs established under the Safe Drinking Water Act and the NH Ambient Groundwater Quality Standards (AGQS) are ARARs.

[2] Interim Cleanup Levels for groundwater under the 1998 ROD also include all Federal and State drinking water standards as they were identified as applicable or relevant and appropriate requirements (ARARs) for this Site.

A. Arsenic in Groundwater

Although ARARs are typically frozen at the time of the ROD, newly promulgated requirements must be met where necessary for protectiveness of the remedy. *See* Section 300.430(f)(l)(ii)(B)(l) of the NCP, 55 FR 8850. The cleanup level for arsenic was based on Federal and State drinking water ARARs. At time of the 1998 ROD, the drinking water standard for arsenic was 50 ug/l, but since groundwater concentrations did not exceed this standard, an Interim Cleanup Level was not established. The MCL for arsenic in drinking water was changed from 50 ug/l to 10 ug/l and became effective as of February 22, 2002. Because groundwater at the Site is classified as a potential drinking water source, the performance standard for arsenic is being changed from 50 ug/l to 10 ug/l to be consistent with the revised drinking water standards. This change in the arsenic MCL does not affect the protectiveness of the remedy in the short term since the municipal water supply is used by residents near the Site. Institutional controls in the form of deed restrictions are to be implemented as part of the 1998 ROD, as amended in the 2009 ROD Amendment, and will provide long-term protection until cleanup levels are achieved. Meeting the current arsenic drinking water standard of 10 ug/l is necessary for the remedy to be protective in the future.

Under CERCLA, EPA cannot cleanup contaminants at a site below natural background concentrations. Therefore, this ESD allows for either the attainment of the 10 ug/l arsenic standard in groundwater or the undertaking of a study to be conducted to determine background levels for arsenic in groundwater for this Site. If a background study is undertaken, the Interim Cleanup Level for arsenic may be revised to the higher of the MCL or background identified pursuant to this study.

Site-wide monitoring of groundwater continues in accordance with an approved Water Monitoring Plan. Currently, arsenic levels in groundwater are not in exceedance of the 10 ug/l drinking water standard. Monitoring will continue at the Site as required in the 1998 ROD, until such time that the Agency determines monitoring is no longer necessary for the protection of human health. Arsenic will continue to be analyzed to measure the protectiveness of the remedy to meet the 10 ug/l drinking water standard (unless a background study is performed which may revise this ICL at a future time).

B. Manganese in Groundwater

In the absence of Federal drinking water standards for manganese in groundwater or other suitable criteria, the 1998 ROD established a risk-based cleanup level of 180 ug/l (0.18 mg/l) for manganese.

In January of 2004, EPA released a Drinking Water Health Advisory for manganese which set the value at 0.3 mg/1 (300 ug/l). This advisory can be found at: http://www.epa.gov/safewater/ccl/pdfs/reg_determine1/support_cc1_magnese_dwreport.pdf

Health Advisories provide information on contaminants that can cause human health effects and are known or anticipated to occur in drinking water. A Drinking Water Health Advisory is not an enforceable standard for action. Health Advisories are guidance values based on non-cancer health effects for different durations of exposure (e.g., one-day, ten-day, and lifetime). This Health Advisory describes concentrations of the contaminant in water that are expected to be without adverse effects for both health and aesthetics.

Manganese is a naturally-occurring element that can be found ubiquitously in the air, soil, and water. Manganese is also an essential nutrient for humans and animals. Adverse health effects can be caused by inadequate intake or over exposure. Manganese deficiency in humans is thought to be rare because manganese is present in many common foods. Manganese intake from drinking water is normally substantially lower than intake from food.

Although manganese is an essential nutrient at low doses, chronic exposure to high doses may be harmful. The health effects from over-exposure of manganese are dependent on the route of exposure, the chemical form, the age at exposure, and an individual's nutritional status. The central nervous system has been determined to be the primary target organ with neurological effects generally observed. The assessment related to the Health Advisory focused on what is believed to be a safe oral intake of manganese for the general human population. The lifetime health advisory value of 0.3 mg/L will protect against concerns of potential neurological effects.

Based upon this more recent evaluation of manganese, the Health Advisory of 0.3 mg/L (300 ug/l) for manganese is now the Interim Cleanup Level for groundwater at the Fletcher's Paint Site.

This change to the groundwater Interim Cleanup Level is not expected to affect the scope, performance or cost of the final remedy. This change in the manganese cleanup level does not affect the protectiveness of the remedy in the short term since the municipal water supply is used by residents near the Site. Institutional controls in the form of deed restrictions are to be implemented as part of the 1998 ROD, as amended by the 2009 ROD Amendment, and will provide long-term protection until cleanup levels are achieved.

Under CERCLA, EPA cannot cleanup contaminants at a site below natural background concentrations. Therefore, this ESD allows for either the attainment of the 300 ug/l manganese standard in groundwater or the undertaking of a study to be conducted to determine background for manganese in groundwater for this Site. If a background study is undertaken, the Interim Cleanup Level for manganese may be revised to the higher of the Health Advisory or background identified pursuant to this study.

The proposed modifications embodied in this ESD will protect human health and the environment, will comply with applicable or relevant and appropriate Federal and State

requirements, and will provide for a long-term and permanent remedy for the Site to a similar degree as the remedy outlined in the 1998 ROD, as amended in 2009.

IV. SUPPORT AGENCY COMMENTS

The State of New Hampshire has participated with the EPA in reviewing these modifications to the remedy which are described herein and concurs with this ESD.

V. STATUTORY DETERMINATION

EPA believes that the remedy as adjusted herein remains protective of human health and the environment and satisfies the requirements in Section 121 of CERCLA. The changes made in this ESD have not changed the remedial action objectives for the Site. Rather, the modifications to the remedy described herein will allow the remedy to continue to perform in the most cost-effective manner practicable while meeting all of the statutory requirements of CERCLA.

VI. PUBLIC INFORMATION

In accordance with Section 117(d) with CERCLA and Section 300.825(a) of the NCP, this ESD will become part of the Site's Administrative Record which is available for public review at the locations identified in the introduction to this document.

A formal comment period is not required when issuing an ESD. As required by NCP §300.435(c)(2)(i)(B), EPA will publish a notice of availability and a brief description of this ESD in a major local newspaper of general circulation following the signing of this ESD.