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Appendix C
MEDEP Concurrence Letter

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.
GOVERNOR

MARTHA KIRKPATRICK
COMMISSIONER

September 19, 2002

Mr. Richard Cavagnero
U.S. Environmental Protection Agency
1 Congress Street
Suite 1100 (HBT)
Boston, MA 02114-2023

Re: Interim Record of Decision Summary-Operable Unit One, Non-Source Area Groundwater
West Site/Hows Corner Superfund Site,
Plymouth, Maine

Dear Mr. Cavagnero:

The Maine Department of Environmental Protection (MEDEP) has completed its review of the Interim Record of Decision Summary Operable Unit One, Non Source Area Groundwater, (September 2002) for the West Site/Hows Corner Superfund Site, in Plymouth, Maine.

Based on this review MEDEP is pleased to concur with the selected interim remedy of hydraulic containment (GW 3) for Operable Unit I, Non Source Area Groundwater. This action consists of a multi-component approach to contain groundwater in the 2-acre fenced area of the George West property (Source Area) to allow for the possible restoration of the groundwater plume beyond this two acre source area (Non Source Area) through natural attenuation processes. Multi layered institutional controls will be used to prevent groundwater use and prevent contaminant migration until cleanup standards have been met. Environmental monitoring with a contingency will be implemented that would provide safe drinking water to residents whose private wells pose an unacceptable risk.

The major components of the hydraulic containment remedy include:

- Installation of a groundwater extraction and treatment system to contain Source Area Groundwater within the 2 acre fenced area of the George West property;
- Monitoring of surface water, sediments, and Non Source Area Groundwater to measure the progress of natural attenuation toward meeting clean up goals;
- Residential well monitoring with a public water contingency;
- Institutional controls; and
- Five-year reviews to assess the Site conditions and determine if the chosen remedy is protective of public health and the environment.

MEDEP understands that this ROD is an interim remedy and is not the final remedy for this Site and that the chemical specific Applicable or Relevant and Appropriate Requirements (ARARs) are waived until the final ROD. The final remedy will be selected after additional study is undertaken on the technical practicability of restoring Source Area Groundwater (Operable Unit II) and a more precise estimate for the restoration of Non-Source Area Groundwater is performed. MEDEP generally supports the implementation of active remedies to reduce the contaminant level in groundwater to shorten the length of time to meet groundwater cleanup ARARs.

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MEDEP looks forward to working cooperatively with EPA to resolve the environmental problems posed by this site. If you have any further questions or comments on this matter please contact Mark Hyland, Director, Division of Remediation (207) 287-7673.

Respectfully,

David Lennett

David Lennett
Director, Bureau of Remediation and Waste Management

Cf: File
Mark Hyland-MEDEP
Denise Messier-MEDEP
Claudia Sait-MEDEP
William Lovely-EPA

Appendix D
References

List of References

USEPA, 2000. *A Site Manager's Guide to Identifying, Evaluating and Selecting Institutional Controls at Superfund and RCRA corrective Action Cleanups.* Office of Emergency and Remedial Response. Washington, D.C.; Directive 9355.0-74FS-P; September 2000.

USEPA., 2000d. *Risk Assessment Guidance for Superfund, Volume I, Part E: Human Health Evaluation Manual, Supplemental Guidance for Dermal Risk Assessment, Interim Guidance.* Office of Emergency and Remedial Response. Washington, D.C. May 2000.

USEPA, 1999. *Use of Monitored Natural Attenuation at Superfund, RCRA Corrective Action, and Underground Storage Tank Sites*; Office of Solid Waste and Emergency Response; Washington D.C.; Directive 9200.4-17P; April 1999.

USEPA, 1999. *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*; Office of Solid Waste and Emergency Response; Washington D.C.; Directive 9200.1-23P; July1999.

USEPA. 1998b. *Risk Assessment Guidance for Superfund, Volume I, Part D: Human Health Evaluation Manual.* EPA-540-R-97-033

USEPA. 1997a. *Ecological Risk Assessment Guidance for Superfund: Process for Designing and Conducting Ecological Risk Assessments. Interim Final.* EPA-540-R-97-006.

USEPA, 1996b. *Final Guidance, Presumptive Response Strategy and Ex Situ Treatment Technologies for Contaminated Ground Water at CERCLA Sites*; Office of Solid Waste and Emergency Response; Washington D.C.; EPA 540/R-96/023; October 1996.

USEPA, 1993a. *Guidance for Evaluating the Technical Impracticability of Ground-Water Restoration – Interim Final*; Office of Solid Waste and Emergency Response; Washington D.C.; Directive 9234.2-25; September 1993.

USEPA. 1991a. *Risk Assessment Guidance for Superfund (RAGS) Volume I: Human Health Evaluation Manual, Supplemental Guidance, Standard Default Exposure Factors.* Office of Solid Waste and Emergency Response. Washington D.C. March 25, 1991.

USEPA. 1991b. *Risk Assessment Guidance for Superfund: Volume I Human Health Evaluation Manual, Part B.* Office of Solid Waste and Emergency Response. Washington D.C. December 1991

USEPA. 1991b. *Risk Assessment Guidance for Superfund: Volume I Human Health Evaluation Manual, Part C.* Office of Solid Waste and Emergency Response. Washington D.C. December 1991

USEPA, 1990a. *National Oil and Hazardous Substances Pollution Contingency Plan* (National Contingency Plan); Code of Federal Regulations, Title 40, Part 300; Federal Register, Volume 55, Number 46, pp. 8666 et seq.; March 9, 1990.

USEPA. 1989b. *Risk Assessment Guidance for Superfund: Volume I Human Health Evaluation, Part A.* Washington D.C. December; EPA-540-1-89-002

USEPA, 1988. *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA*; USEPA Office of Solid Waste and Emergency Response; Washington, DC; Interim Final, October 1988.

USEPA, 1988. *Guidance Document for Providing Alternate Water Supplies*; USEPA Office of Solid Waste and Emergency Response; Washington, DC; Directive 9355.3-03; April 1999., October 1988.

Woodard Curran Inc. (W&C), 2001. *Remedial Investigation Report;* July 2001.

Woodard Curran Inc. (W&C), 2001. *Final Feasibility Study Report-Non-Source Area Groundwater*; July 2002.

Appendix E
List of Acronyms

LIST OF ACRONYMS

AET	Apparent Effects Threshold
ARAR	Applicable or Relevant and Appropriate Requirement
As	Arsenic
ATSDR	Agency for Toxic Substances and Disease Registry
AWQC	ambient water quality concentration criterion
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
COC	chemicals of concern
COPC	compound of potential concern
CWA	Clean Water Act
DO	dissolved oxygen
DOC	dissolved organic compound
ERA	Ecological Risk Assessment
EE/CA	Engineering Evaluation/Cost Analysis
EPC	exposure point concentration
ESD	explanation of significant differences
Fm.	Formation
FS	Feasibility Study
GAC	granular activated carbon
gpm	gallons per minute
HHRA	Human Health Risk Assessment
HI	Hazard Index
HQ	Hazard Quotient
HRS	Hazard Ranking System
LOEL	Lowest Observed Effect Level
MCL	maximum contaminant level.
MCLG	Maximum Contaminant Level Goal
mg/kg	milligrams per kilogram
MEDEP	Maine Department of Environmental Protection
MEDHS	Maine Department of Human Services
MEG	maximum exposure guidelines
MM	management of migration
NCP	National Contingency Plan
NPL	National Priorities List
NTCRA	Non-Time Critical Removal Action
O&M	Operations and Maintenance
OSRR	Office of Site Remediation and Restoration
OU	operable unit

LIST OF ACRONYMS (continued)

PQL	practical quantitation limit
PRG	preliminary remediation goal
RBC	risk based concentration
RCRA	Resource Conservation and Recovery Act
RfD	reference dose
RI	Remedial Investigation
ROD	Record of Decision
RME	reasonable maximum exposure
SARA	Superfund Amendments and Reauthorization Act
SC	source control
SDWA	Safe Drinking Water Act
SML	Saco Municipal Landfill
SWQC	statewide water quality criteria
SVOC	semivolatile organic compound
TBC	to be considered
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
VOC	volatile organic compound
W&C	Woodard & Curran Inc.
WQS	water quality standard
WQC	water quality criteria
WWTP	waste water treatment plant
µg/L	micrograms per liter
µg/g	micrograms per gram

Appendix F
ARARs Table

ALTERNATIVE GW-3: HYDRAULIC CONTAINMENT
CHEMICAL-SPECIFIC ARARS
HOWS CORNER SUPERFUND SITE
PLYMOUTH, MAINE

Requirement	Status	Summary of Requirement	Action to be Taken to Attain ARARs
Groundwater and Surface Waters			
Federal Regulatory Requirements			
Safe Drinking Water Act (SDWA) § 1412 (42 U.S.C. § 300 g-1, 40 C.F.R. §§ 141.11 to 141.6)	Relevant and Appropriate	Maximum Contaminant Levels (MCLs) have been promulgated for several common organic and inorganic contaminants. These levels regulate the concentration of contaminants in public drinking water supplies, but may also be considered relevant and appropriate for groundwater aquifers used for drinking water.	Alternative GW-3 may comply with ARARs within a reasonable time frame (i.e., less than 100 years).
SDWA § 1412 (42 U.S.C. § 300 g-1, 40 C.F.R. §§ 141.50 to 141.51)	Relevant and Appropriate	Non-zero Maximum Contaminant Level Goals (MCLGs) are health-based criteria established for a number of organic and inorganic contaminants as water quality goals for drinking water supplies. These goals may also be considered for groundwater aquifers used for drinking water.	Alternative GW-3 may comply with ARARs within a reasonable time frame (i.e., less than 100 years).
State of Maine Regulatory Requirements			
Maine Drinking Water Rules (10-144A C.M.R. Chapters 231-233)	Relevant and Appropriate	Maine's Primary Drinking Water Standards are equivalent to federal MCLs.	Alternative GW-3 may comply with ARARs within a reasonable time frame (i.e., less than 100 years).
Rules Relating to Testing of Private Water Systems for Potentially Hazardous Contaminants (10-144A C.M.R. Chapter 233, Appendix C).	Relevant and Appropriate	These rules establish criteria for potentially hazardous contaminants occurring in private residential water systems.	Alternative GW-3 may comply with ARARs within a reasonable time frame (i.e., less than 100 years).

ALTERNATIVE GW-3: HYDRAULIC CONTAINMENT
CHEMICAL-SPECIFIC ARARS

FEASIBILITY STUDY REPORT
HOWS CORNER SUPERFUND SITE
PLYMOUTH, MAINE

Requirement	Status	Summary of Requirement	Action to be Taken to Attain ARAR
Groundwater and Surface Water (cont'd)			
State of Maine Regulatory Requirements (cont'd)			
Hazardous Waste Management Rule (06-096 C.M.R. Chapter 854).	Relevant and Appropriate	This rule establishes performance standards for establishment, construction, alteration, and operation of hazardous waste management units, including miscellaneous units. "No hazardous waste or constituent or derivative thereof shall appear in ground or surface waters at a concentration above background level, or above current public health drinking water standards for Maine, including the Maximum Exposure Guidelines, or standards for aquatic toxicity, whichever is more stringent." (Chapter 854, 15(A)(1)(a))	Alternative GW-3 may comply with ARARs within a reasonable time frame (i.e., less than 100 years).
Draft Interim Maximum Exposure Guidelines (MEGs) (Bureau of Health, Maine Department of Human Services, January 3, 2000)	To Be Considered	Health-based guidelines developed for drinking water by the Bureau of Health Environmental Toxicology Program.	Alternative GW-3 may comply with these guidelines within a reasonable time frame. To the extent they are more stringent than other standards cited above, these guidelines would be considered during implementation of this alternative.

NOTES:

ARAR = Applicable or Relevant and Appropriate Requirement
MCL = Maximum Contaminant Level
MCLG = Maximum Contaminant Level Goal
MEG = Maximum Exposure Guideline
SDWA = Safe Drinking Water Act
µg/L = microgram per liter

ALTERNATIVE GW-3: HYDRAULIC CONTAINMENT
LOCATION -SPECIFIC ARARS
HOWS CORNER SUPERFUND SITE
PLYMOUTH, MAINE

Requirement	Status	Summary of Requirement	Action to be Taken to Attain ARARs
Wetlands/Floodplains			
Federal Regulatory Requirements			
Wetland Executive Order (EO11990), 40 C.F.R. Part 6, Appendix A	Applicable	The Wetlands Executive Order requires federal agencies to minimize the destruction, loss, or degradation of wetlands, and preserve and enhance natural and beneficial values of wetlands. Activity in a wetland is prohibited unless there is no practical alternative. If there is no practical alternative, impacts must be minimized.	Applicable if the one small wetland area is subject to federal jurisdiction. Additional small wetland areas are located within 0.5 to 1.0 mile of the Site. There is no practical alternative to containing source area groundwater. Efforts will be made to minimize impacts to wetland and surface water bodies from remedial activities.
Clean Water Act (CWA) § 404 Requirements for Dredged or Fill Material (33 U.S.C. § 1344, 40 C.F.R. Part 230)	Applicable	Under this requirement, no activity that adversely affects a wetland shall be permitted if a practicable alternative is available. There is no practical alternative to this alternative.	There are no jurisdictional wetlands on the Hows Corner Site. If wetlands are encountered, then this regulation would be applicable. In that case, all practicable measures will be taken to minimize and mitigate adverse impacts to those wetlands.
State of Maine Regulatory Requirements			
Maine Natural Resources Protection Act (NRPA, 38 M.R.S.A. §§ 480-A to 480-Z) Wetland Rules, Permit By Rule Standards (06-096 C. M.R. Chapters 305 and 310)	Applicable	This act outlines requirements and performance standards for certain activities in, on, over, or adjacent to freshwater wetlands, streams, ponds, or brooks. The activities must not unreasonably interfere with certain natural features, such as natural flow or quality of any waters, nor harm significant aquatic habitat, freshwater fisheries, or other aquatic life.	If remedial activities occur within a wetland area, stream, pond, or brook, the requirements of the NRPA will be met. Efforts will be made to protect all wetland and surface water bodies from significant adverse effects due to remedial activities.
Erosion and Sedimentation Control (38 M.R.S.A., Subsec. 420-C), Chapter 500, Stormwater Management Rules	Applicable	Erosion control measures must be implemented prior to the start of activities such as the displacement, filling, or exposure of any soil of earthen materials.	During construction activities, the appropriate controls will be in place to address erosion, sedimentation, and stormwater

ALTERNATIVE GW-3: HYDRAULIC CONTAINMENT
LOCATION -SPECIFIC ARARS
HOWS CORNER SUPERFUND SITE
PLYMOUTH, MAINE

NOTES:

ARAR	=	Applicable or Relevant and Appropriate Requirement
CWA	=	Clean Water Act
NEPA	=	National Environmental Policy Act
NRPA	=	Natural Resources Protection Act
µg/L	=	microgram per liter

ALTERNATIVE GW-3: HYDRAULIC CONTAINMENT
ACTION -SPECIFIC ARARS
HOWS CORNER SUPERFUND SITE
PLYMOUTH, MAINE

Requirement	Status	Requirement Synopsis	Actions To Be Taken To Attain ARARs
Groundwater and Surface Waters			
Federal Regulatory Requirements			
Clean Water Act (CWA) § 304(a) (33 U.S.C. §1314(a))	Relevant and Appropriate	Federal Ambient Water Quality Criteria (AWQC) include (1) health-based criteria developed for 95 carcinogenic and non-carcinogenic compounds and (2) other water quality parameters protective of fish and aquatic life. AWQC for the protection of human health provide levels for exposure from drinking water and consuming aquatic organisms, and from consuming fish alone.	Environmental monitoring will be evaluated from surface waters to ensure no adverse impact from this alternative.
Resource Conservation and Recovery Act (RCRA, 42 USC 6901-6992) - Groundwater Protection	Relevant and Appropriate	This regulation outlines the requirements for groundwater monitoring for RCRA-permitted hazardous waste Treatment, Storage, and Disposal (TSD) facilities.	Groundwater monitoring will be conducted in accordance with these requirements.
Underground Injection Control Regulations (40 CFR Parts 144, 145, 146, and 147)	Relevant and Appropriate	These regulations provide compliance standards for radioactive and hazardous waste that is injected underground. Injection must not endanger health or drinking water supplies.	Under this alternative, groundwater will be extracted for treatment and subsequently discharged to the subsurface. Extracted groundwater may need to be treated to meet the standards in this regulation.
RCRA – Identification and Listing of Hazardous Wastes (40 CFR 261)	Applicable	Defines those wastes that are subject to regulations as hazardous wastes under 40 CFR Parts 264-265 and Parts 124, 270, and 271.	Contaminanted media generated under this alternative will be tested and the analytical results evaluated against the criteria and definitions of hazardous waste. Waste will be treated, stored, and disposed of in accordance with results.

ALTERNATIVE GW-3: HYDRAULIC CONTAINMENT
ACTION -SPECIFIC ARARS
HOWS CORNER SUPERFUND SITE
PLYMOUTH, MAINE

Groundwater and Surface Water (cont'd)			
Federal Regulatory Requirements (cont'd)			
RCRA – General Facility Standards (40 CFR 264.18)	Relevant and Appropriate	These regulations outline requirements for owners and operators of hazardous waste treatment, storage, and disposal facilities with respect to general waste analysis, security, general inspection requirements, personnel training, location standards, and general requirements for ignitable, reactive, or in compatible wastes.	These substantive requirements will be followed for this alternative.
RCRA - Contingency Plan and Emergency Procedures (40 CFR 264.50-264.56)	Relevant and Appropriate	These regulations outline the requirements for emergency procedures to be used following explosions, fires, etc., and they outline emergency procedures and requirements for the development of contingency plans.	These requirements will be followed for this alternative.
RCRA - Tank Systems (40 CFR 264.190-264.200)	Relevant and Appropriate	These regulations outline the general operating requirements and inspections of existing or newly installed tank systems. Specifically, containment and detection of releases is regulated, as well as responses to leaks or spills and special requirements for ignitable, reactive, and incompatible wastes.	If tank systems are constructed during remedial activities, they will be constructed to comply with the substantive provisions in this requirement.
RCRA - Air Emission Standards (40 CFR 264.1030-264.1036)	Relevant and Appropriate	These regulations outline standard emissions for process vents, closed-vent systems, and control devices. Requirements for test methods, procedures, recordkeeping, and reporting are also outlined.	If on-site hazardous waste facilities are constructed that include process vents, closed-vent systems and control devices subject to these regulations, the substantive requirements of these regulations will be met.
RCRA - Preparedness and Prevention (40 CFR 264.30-264.37)	Relevant and Appropriate	This regulation outlines requirements for safety equipment and spill-control requirements for hazardous waste facilities. This regulation specifies that facilities be designed, maintained,	These requirements will be followed for this alternative.

ALTERNATIVE GW-3: HYDRAULIC CONTAINMENT
ACTION -SPECIFIC ARARS
HOWS CORNER SUPERFUND SITE
PLYMOUTH, MAINE

Requirement	Status	Requirement Synopsis	Actions To Be Taken To Attain ARARs
Groundwater and Surface Waters (cont'd)			
State of Maine Regulatory Requirements			
Maine Rules to Control the Subsurface Discharge of Pollutants by Well Injection (38 M.R.S.A., Chapter 3, Section 413, Chapter 543)	Relevant and Appropriate	This regulation prohibits the injection of hazardous waste into or above water-bearing formations via a new Class V well. The subsurface discharge into or through a Class V well that would cause or allow the movement of fluid into an underground source of drinking water that may result in a violation of any Maine Primary Drinking Water Standard, or which may otherwise adversely affect public health, is prohibited.	These rules will be followed in determining the appropriate treatment of groundwater prior to subsurface discharge.
Air			
State of Maine Regulatory Requirements			
Maine Air Quality Control Laws; Protection and Improvements of Air (38 M.S.R.A. 581-608-A), Chapters 101, 105, 110, 115.	Relevant and Appropriate	This law and its associated regulations detail the requirements, limitations, and exemptions of state air emissions including fugitive dust and emissions from air strippers.	Measures will be taken under this alternative to comply with these regulations.
Interim Ambient Air Guidelines	TBC	These guidelines provide ambient air standards used to set emissions.	These guidelines will be considered when reviewing any action that results in air emissions.
38 M.R.S.A CMR 530.5	Relevant and Appropriate	Includes state ambient water quality criteria for direct and indirect sources.	Criteria will be monitored in surface waters to ensure that remedy is protective.
Maine Hazardous Waste Septage and Solid Waste Management Act,38 M.R.S.A 13, Chapters 850, 851, 853-857	Relevant and Appropriate	Includes state requirements for the management of waste.	Waste generated during remedial action will be hauled in accordance with these requirements.
Maine Classification of Waters Program 38 M.R.S.A. 465-C, 464(4)(A)(1)	Applicable	Provides for classification of Maine's surface and groundwater.	Actions taken at the Site that involve groundwater and surface water will be consistent with classifications.

ALTERNATIVE GW-3: HYDRAULIC CONTAINMENT
ACTION -SPECIFIC ARARS
HOWS CORNER SUPERFUND SITE
PLYMOUTH, MAINE

NOTES:

ARAR	=	Applicable or Relevant and Appropriate Requirement
CFR	=	Code of Federal Regulations
CWA	=	Clean Water Act
TSD	=	Treatment, Storage, and Disposal
RCRA	=	Resource Conservation and Recovery Act
µg/L	=	microgram per liter

Appendix G
Administrative Record Index and Guidance Documents

WEST SITE/HOWS CORNERS
ENTIRE SITE
ADMINISTRATIVE RECORD FILE
PROPOSED PLAN

3. REMEDIAL INVESTIGATION (RI)

1. LETTER: LETTER TRANSMITTING RECEPTION OF THE REMEDIAL INVESTIGATION/FEASIBILITY STUDY ADMINISTRATIVE ORDER BY CONSENT.
   TO: MICHAEL PARKER, US EPA REGION 1
   WILLIAM LOVELY, US EPA REGION 1
   AUTHOR: DAVID P LITTELL, PIERCE ATWOOD
   DOC ID: 32715 06/22/2000 1 PAGE

2. LETTER: FORMAL NOTICE OF SELECTION OF WOODARD AND CURRAN TO ACT AS THE SUPERVISING CONTRACTOR AND PROJECT COORDINATOR FOR ALL TECHNICAL ACTIVITIES REQUIRED FOR THE REMEDIAL INVESTIGATION/FEASIBILITY STUDY.
   TO: WILLIAM LOVELY, US EPA REGION 1
   AUTHOR: DAVID P LITTELL, PIERCE ATWOOD
   DOC ID: 32721 08/02/2000 1 PAGE

3. LETTER: TRANSMITTAL LETTER FOR THE DRAFT REMEDIAL INVESTIGATION REPORT WITH APPENDICES AND THE DRAFT FEASIBILITY STUDY REPORT WITH APPENDICES.
   TO: WILLIAM LOVELY, US EPA REGION 1
   AUTHOR: GUY WILLIAM VAILLANCOURT, WOODARD & CURRAN INC
   DOC ID: 32733 10/20/2000 1 PAGE

4. LETTER: COMMENTS ON REMEDIAL INVESTIGATION REPORT (CHAPTERS 1 - 5 AND APPENDIX A).
   TO: DAVID P LITTELL, PIERCE ATWOOD
   AUTHOR: WILLIAM LOVELY, US EPA REGION 1
   DOC ID: 32739 12/21/2000 36 PAGES

5. LETTER: COMMENTS ON THE REMEDIAL INVESTIGATION REPORT (CHAPTERS 6 - 9).
   TO: DAVID P LITTELL, PIERCE ATWOOD
   AUTHOR: WILLIAM LOVELY, US EPA REGION 1
   DOC ID: 32741 01/12/2001 19 PAGES

6. LETTER: PROPOSAL FOR CHANGE OF WOODARD & CURRAN PROJECT MANAGER.
   TO: DAVID P LITTELL, PIERCE ATWOOD
   AUTHOR: GUY WILLIAM VAILLANCOURT, WOODARD & CURRAN INC
   DOC ID: 32735 05/15/2001 1 PAGE

7. LETTER: COMMENTS ON THE INTERIM FINAL REMEDIAL INVESTIGATION REPORT.
   TO: DAVID P LITTELL, PIERCE ATWOOD
   AUTHOR: CLAUDIA SAIT, MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION
   DOC ID: 32742 05/22/2001 6 PAGES

8. LETTER: COMMENTS ON THE FINAL INTERIM REMEDIAL INVESTIGATION REPORT.
   TO: DAVID P LITTELL, PIERCE ATWOOD
   AUTHOR: WILLIAM LOVELY, US EPA REGION 1
   DOC ID: 32744 05/31/2001 4 PAGES

9. REPORT: FINAL REMEDIAL INVESTIGATION REPORT, (VOLUME 1 OF 4).
   AUTHOR: WOODARD & CURRAN INC
   DOC ID: 29575 07/01/2001 273 PAGES

3.REMEDIAL INVESTIGATION (RI) (cont)

10. REPORT: FINAL REMEDIAL INVESTIGATION REPORT, (VOLUME 2 OF 4).
AUTHOR: WOODARD & CURRAN INC
DOC ID: 29795 07/01/2001 286 PAGES

11. REPORT: FINAL REMEDIAL INVESTIGATION REPORT, (VOLUME 3 OF 4), APPENDICES A-D, (PART 1 OF 2).
AUTHOR: WOODARD & CURRAN INC
DOC ID: 29807 07/01/2001 273 PAGES

12. REPORT: FINAL REMEDIAL INVESTIGATION REPORT, (VOLUME 3 OF 4), APPENDIX E, (PART 2 OF 2).
AUTHOR: WOODARD & CURRAN INC
DOC ID: 29808 07/01/2001 129 PAGES

13. REPORT: FINAL REMEDIAL INVESTIGATION REPORT, (VOLUME 4 OF 4), APPENDICES F - G (MONITORING WELL SHEETS), (PART 1 OF 2).
AUTHOR: WOODARD & CURRAN INC
DOC ID: 30159 07/01/2001 285 PAGES

14. REPORT: FINAL REMEDIAL INVESTIGATION REPORT, (VOLUME 4 OF 4), APPENDICES G (RESIDENTIAL FIELD CHANGES) - I, (PART 2 OF 2).
AUTHOR: WOODARD & CURRAN INC
DOC ID: 30161 07/01/2001 95 PAGES

15. LETTER: TRANSMITTAL OF REMEDIAL INVESTIGATION REPORT.
TO: WILLIAM LOVELY, US EPA REGION 1
AUTHOR: THOMAS R ESCHNER, WOODARD & CURRAN INC
DOC ID: 32736 07/24/2001 2 PAGES

4. FEASIBILITY STUDY (FS)

1. LETTER: COMMENTS ON DRAFT FEASIBILITY STUDY FOR OCTOBER 2000.
TO: DAVID P LITTELL, PIERCE ATWOOD
AUTHOR: WILLIAM LOVELY, US EPA REGION 1
DOC ID: 32749 06/15/2001 4 PAGES

2. LETTER: LETTER DISCUSSING PRELIMINARY REMEDIATION GOALS (PRG'S), APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARS) AND INSTITUTIONAL CONTROLS PRIOR TO THE SUBMITTAL OF THE REVISED FEASIBILITY STUDY.
TO: DAVID P LITTELL, PIERCE ATWOOD
AUTHOR: WILLIAM LOVELY, US EPA REGION 1
DOC ID: 32745 02/26/2002 2 PAGES

3. LETTER: RESPONSE TO CONCERNS RAISED IN DAVID LITTELL'S LETTER.
TO: DAVID P LITTELL, PIERCE ATWOOD
DOC ID: 32746 03/07/2002 2 PAGES

4.FEASIBILITY STUDY (FS) (cont)

4. LETTER: PRP'S CONCERNS WITH REMEDIAL ALTERNATIVES IDENTIFIED IN THE FEASIBILITY STUDY.
TO: CLAUDIA SAIT, MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION
WILLIAM LOVELY, US EPA REGION 1
AUTHOR: DAVID P LITTELL, PIERCE ATWOOD
DOC ID: 32747 03/21/2002 3 PAGES

5. LETTER: COMMENTS ON THE REVISED FEASIBILITY STUDY REPORT.
TO: CLAUDIA SAIT, MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION
WILLIAM LOVELY, US EPA REGION 1
AUTHOR: DAVID P LITTELL, PIERCE ATWOOD
DOC ID: 32750 06/14/2002 4 PAGES

6. LETTER: COMMENTS TO THE FEASIBILITY STUDY (VERSION 3).
TO: WILLIAM LOVELY, US EPA REGION 1
AUTHOR: CLAUDIA SAIT, MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION
DOC ID: 32752 06/14/2002 7 PAGES

7. REPORT: FINAL FEASIBILITY STUDY REPORT - NON-SOURCE AREA GROUNDWATER.
AUTHOR: WOODARD & CURRAN INC
DOC ID: 32776 07/01/2002 321 PAGES

8. REPORT: PROPOSED PLAN FOR GROUNDWATER CLEANUP.
AUTHOR: US ENVIRONMENTAL PROTECTION AGENCY
DOC ID: 32695 07/01/2002 19 PAGES

9. LETTER: REVISIONS TO THE DRAFT FEASIBILITY STUDY (COVER LETTER ONLY).
TO: DAVID P LITTELL, PIERCE ATWOOD
AUTHOR: WILLIAM LOVELY, US EPA REGION 1
DOC ID: 32748 07/02/2002 2 PAGES

10. LETTER: TRANSMITTAL OF FINAL FEASIBILITY STUDY REPORT - NON-SOURCE AREA GROUNDWATER.
TO: WILLIAM LOVELY, US EPA REGION 1
AUTHOR: THOMAS R ESCHNER, WOODARD & CURRAN INC
DOC ID: 32777 07/08/2002 1 PAGE

11. LETTER: EPA APPROVES THE FINAL FEASIBILITY STUDY.
TO: DAVID P LITTELL, PIERCE ATWOOD
AUTHOR: WILLIAM LOVELY, US EPA REGION 1
DOC ID: 32802 07/09/2002 1 PAGE

13. COMMUNITY RELATIONS

1. FACT SHEET: COMMUNITY UPDATE #1.
AUTHOR: US EPA REGION 1
DOC ID: 32555 09/01/1997 4 PAGES

2. FACT SHEET: FACT SHEET: THE SUPERFUND PROCESS.
AUTHOR: US EPA REGION 1
DOC ID: 32554 10/01/1997 4 PAGES

13.COMMUNITY RELATIONS (cont)

3. FACT SHEET: COMMUNITY UPDATE #4: FIELD STUDIES PROGRAM BEGINS.
AUTHOR: US EPA REGION 1
DOC ID: 32556 11/01/1999 3 PAGES

4. FACT SHEET: COMMUNITY UPDATE #5: FIELD STUDIES MAKES HEADWAY.
AUTHOR: US EPA REGION 1
DOC ID: 32557 03/01/2000 3 PAGES

5. FACT SHEET: COMMUNITY UPDATE #6: FIELD STUDIES REPORT NEAR COMPLETION.
AUTHOR: US EPA REGION 1
DOC ID: 32558 08/01/2000 3 PAGES

6. FACT SHEET: COMMUNITY UPDATE #7: CLEANUP STUDIES NEAR COMPLETION.
AUTHOR: US EPA REGION 1
DOC ID: 32559 04/01/2002 6 PAGES

7. NEWS CLIPPING: NOTICE OF EPA CLEANUP FOR THE WEST SITE/HOWS CORNERS SUPERFUND SITE.
AUTHOR: BANGOR DAILY NEWS
DOC ID: 35307 07/05/2002 1 PAGE

8. PUBLIC MEETING RECORD: PUBLIC HEARING RECORD.
AUTHOR: DON THOMPSON & ASSOCIATES COURT REPORTING
DOC ID: 35308 08/06/2002 20 PAGES

17. SITE MANAGEMENT RECORDS

1. LETTER: LETTER DESIGNATING PRP RI/FS GROUP AS AUTHORIZED REPRESENTATIVES OF EPA & ALLOWING FOR SITE ACCESS.
TO: DAVID P LITTELL, PIERCE ATWOOD
AUTHOR: MARY JANE ODONNELL, US EPA REGION 1
DOC ID: 32753 10/19/1999 1 PAGE

20. RECORDS MANAGEMENT

1. LIST : LIST OF GUIDANCE DOCUMETNS FOR THE WEST SITE/ HOWS CORNER SITE.
AUTHOR: WILLIAM LOVELY, US EPA REGION 1
DOC ID: 32803 07/10/2002

Guidance Documents for the West Site/Hows Corner Proposed Plan Administrative Record.

DOCNUMBER	DOCDATE	TITLE
C189	5/1/1991	MANAGEMENT OF INVESTIGATION-DERIVED WASTES DURING SITE INSPECTIONS.
2002	10/1/1988	INTERIM FINAL GUIDANCE FOR CONDUCTING REMEDIAL INVESTIGATIONS AND FEASIBILITY STUDIES UNDER CERCLA.
4001	2/1/1988	GUIDANCE DOCUMENT FOR PROVIDING ALTERNATE WATER SUPPLIES
2413	12/1/1988	GUIDANCE ON REMEDIAL ACTIONS FOR CONTAMINATED GROUND WATER AT SUPERFUND SITES
2410	10/18/1989	CONSIDERATIONS IN GROUND WATER REMEDIATION AT SUPERFUND SITES
2409	4/1/1989	GUIDE ON REMEDIAL ACTIONS FOR CONTAMINATED GROUND WATER [QUICK REFERENCE FACT SHEET]
2014	8/1/1990	GUIDANCE ON REMEDIAL ACTIONS FOR SUPERFUND SITES WITH PCB CONTAMINATION
C158	10/4/1993	GUIDANCE FOR EVALUATING THE TECHNICAL IMPRACTICABILITY OF GROUND WATER RESTORATION.
C174	12/1/1989	RISK ASSESSMENT GUIDANCE FOR SUPERFUND. VOLUME I. HUMAN HEALTH EVALUATION MANUAL (PART A). INTERIM FINA
C361	6/2/1997	ECOLOGICAL RISK ASSESSMENT GUIDANCE FOR SUPERFUND PROCESS FOR DESIGNING AND CONDUCTING ECOLOGICAL
C475	11/1/1997	USE OF MONITORED NATURAL ATTENUATION AT SUPERFUND, RCRA CORRECTIVE ACTION, AND UNDERGROUND STORAGI
	9/1/2000	INSTITUTIONAL CONTROLS: A SITE MANAGERS GUIDE TO ....
	1/1/1998	RISK ASSESSMENT GUIDANCE FOR SUPERFUND, VOLUME I, HUMAN HEALTH EVALUATION MANUAL, INTERIM