

**Kearsarge Metallurgical Corporation
Reuse Assessment
September 2004**



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Purpose

EPA New England is responsible for the cleanup of over 100 Superfund sites throughout New England. Although protecting human health and the environment is the primary objective of these cleanups, EPA also recognizes the value in helping to return Superfund sites to beneficial reuse. Understanding the current and likely future uses of a site are fundamental to achieving both objectives.

Most importantly, accurate information on the likely uses of a Superfund site and the surrounding area is necessary to make reasonable assumptions about possible exposures to contaminants. These assumptions form the basis for establishing site-specific cleanup levels and, ultimately, for designing protective remedies. Uncertainty in this information makes it difficult to appropriately tailor the site investigation and cleanup, and oftentimes leads to increased project costs and delays.

From the standpoint of facilitating site reuse, details regarding current or planned uses can enable EPA to consider those uses in the selection, design and implementation of remedies. For instance, it may be possible to locate a soil or groundwater treatment system so as not to physically restrict the construction of future buildings. In other cases, the cleanup might be phased in a way that allows certain portions of a site to be available sooner. There are numerous Superfund sites across the country where reuse has already been facilitated in this manner. Such accommodations will only be considered if they do not compromise the protectiveness of the cleanup.

This Reuse Assessment summarizes information on the current and potential future uses at the Kearsarge Metallurgical Corporation Superfund site (the Site) located in the village of Conway within the Town of Conway, New Hampshire. Potential future reuse-related issues are also described.

This Reuse Assessment is presented in two sections:

Section 1 - Site Background: Describes the physical, environmental and historical context of the Site.

Section 2 - Use / Reuse Status: Describes the current and potential future uses of the Site. Potential use / reuse considerations related to the Site are also discussed.

SECTION 1 - SITE BACKGROUND

General Description

The Kearsarge Metallurgical Corporation (KMC) Superfund site (the Site) is located on Hobbs Street (previously called Mill Street) in the village of Conway within the Town of Conway, New Hampshire. The Site is approximately one-half mile from the intersection of state Route 16 and West Main Street.

The Site, totaling approximately 9+ acres, currently includes three distinct properties: (1) the 4-acre KMC property, where that company's manufacturing operations took place; (2) an undeveloped 5-acre parcel owned by OCR, Inc (through a land trust) that is located east

<u>QUICK FACTS</u>	
Location:	123 Hobbs Street Town of Conway, NH (Carroll County)
Site Area:	9+ Acres
Number of Parcels:	3
Current Uses:	Former commercial use, one former commercial building, former wetlands and undeveloped land.
Current Zoning:	Commercial/Industrial use.
Ownership:	Private
Cleanup Status:	Construction Completed; Groundwater treatment ongoing.
EPA Contacts:	Richard Goehlert Remedial Project Manager (617) 918-1335

of the former KMC facility; and (3) a small portion of property currently owned by Conway Business Park, LLC which is primarily used for office space and storage (see attached Figure 3-2). Although the KMC and OCR, Inc. properties are the primary sources of contamination, the Conway Business Park property has been included in the Site boundary because groundwater contamination has come to be located underneath it. The Site is bounded by Pequawket Pond to the south, a wooded wetland to the east, Hobbs Street and American Air Systems to the west, Hobbs Street and Conway Business Park to the northwest, and Yield House/Renovator Supply, Inc. to the north.

KMC manufactured precision stainless steel castings from 1964 until it went out of business in 1982. The wastes produced from the cast-making processes (casting, cleaning, finishing, and pickling) were initially disposed of on site. During the 1970s and 1980s, some of these wastes were drummed and stored on site. A large, 15-foot-high pile of approximately 9,000 cubic yards of solid waste was previously located behind the foundry building (Building #1). This waste pile, which extended across the KMC property line onto OCR, Inc. property, contained ceramic sand, scrap metal, rusted drums, and various other refuse from foundry operations. A second, smaller pile of waste (approximately 400 cubic yards) was previously located on the northern end of the KMC property.

As a result of historic operations at the KMC facility, ground water became contaminated with chlorinated solvents and select metals. The ground water contamination was primarily

Chronology of Key Events

Pre 1964	Site operates as a sawmill.
1964 - 1982	KMC manufactures stainless steel castings.
1970s	Acids, chlorinated solvents, caustics, and flammable liquids are disposed of on the ground surface, into waste piles and a septic system.
1979	New Hampshire Water Supply and Pollution Control Commission notifies KMC that discharges to the septic system are not permitted.
1982	Property is abandoned; Indian Head Bank takes possession of the property pursuant to security agreements for a short period of time. NH Bureau of Hazardous Waste Management (NHBHWM) issues a Notice of Violation and Order of Abatement to KMC. NHBHWM begins hydrologic investigation of the Site. Monitoring wells show significant levels of chlorinated solvents in groundwater.
1983	NHBHWM orders KMC to remove waste piles from the Site. No action is taken by KMC.
1984	Owner declares bankruptcy and the KMC Site is added to the NPL.
1985	Consent Order – State of New Hampshire vs. KMC, orders KMC and its insurance carriers to perform RI/FS.
1988	Court decides in favor of KMC to discontinue funding the RI/FS work. NH DES takes over the RI/FS work.
1990	Proposed cleanup plan is released for public comment. Action Memorandum providing for removal of seven drums of hazardous materials from the Site is issued by EPA (drums removed in April 1991). ROD signed by EPA.
1992	Explanation of Significant Differences (ESD) providing for some changes/clarifications to the ROD Selected Remedy. Source Control Remedial Action commences and is completed.
1993	Groundwater pump and treat system begins operation.
1994	EPA and NH DES enter into a cooperative agreement for long-term remedial actions of the extraction system and treatment plant.
2000	EPA Modifies the ground water system by installing a recovery trench and Extraction Well EW-13A.
2003	EPA issues second ESD requiring additional soil excavation and changes to groundwater cleanup goals for two contaminants. Additional soil excavation and groundwater recovery trench reconfiguration completed.
2004	EPA transfers responsibilities for Site operation & Maintenance (O&M) of the groundwater recovery and treatment plant to NH DES.

found in the shallow aquifer, with lower levels of contamination identified in the deep and intermediate aquifers.

The Site is fairly level throughout and is located entirely within the 100-year floodplain of Pequawket Pond. The water table at the Site is variable; fluctuating with the seasons and management of the water level in the pond by way of a downstream dam. Typically, water levels on the Site range from two to six feet below the ground surface.

Surrounding Land Uses and Zoning:

The area surrounding the Site is currently used for commercial/ industrial purposes. The lots which immediately surround the Site and their owners/tenants are as follows (see attached Figure 3-2):

Map 227, Lot 138 (formerly Map 27, Lot 7A) - Owned and occupied by Yield House/Renovator Supply, Inc.

Map 227, Lot 143 (formerly Map 27, Lot 9) - Formerly owned and operated by New England Embroidery. Currently owned by Frick and Frack, LLC. Occupied and operated by American Air Systems, Inc.

Map 227, Lot 182 (formerly Map 27, Lots 50B) - Currently owned by Little GEM, Inc.

Approximately 8,100 people live within 3 miles of the Site. Additionally, a number of residences are located along Pequawket Pond, which abuts the Site to the south. There are no residences on or immediately adjacent to the Site. The closest residence is approximately 600 ft from the Site, across Pequawket Pond.

Groundwater Use:

The village of Conway within the Town of Conway, New Hampshire receives all of its' drinking water through a public supply, consisting of a well field operated by the Conway Village Fire Department. This well field consists of two municipal wells which are located approximately 3,000 feet north of the Site just off the Kancamagus Highway (Route 112). Although the Site rests upon the same aquifer that the public drinking water supply wells use, the Site is currently outside the zone that contributes groundwater to these supply wells (see attached Figure 5-1).

Surface Water:

The Site, which includes a wooded wetland to the east, is located along the north bank of Pequawket Pond. There are no public beaches on the pond; however, there is a private beach belonging to the Cranmore Shores Association. The pond is also used by local residents for recreational purposes such as boating, fishing, and swimming.

Environmental History / Status

A more detailed description of the Site history can be found in Section II of the 1990 Record of Decision.

Past Plant Operations:

Prior to 1964, the Site and many of the surrounding properties were operated by the Kennett Company as a sawmill. Kearsarge Metallurgical Corporation manufactured precision stainless steel castings from 1964 until going out of business in 1982. The wastes produced from the cast-making processes (casting, cleaning, finishing, and pickling) were initially disposed of on site. Acids, chlorinated solvents, caustics, and flammable liquids were discharged on the ground surface, into waste piles and a septic system on site. The septic tank discharged to the ground via a lower leach field and drainage pipe. The septic tank and leach field were located directly east of the foundry building (Building #1) on the KMC property (see attached Figure 3).

EPA and State Response Actions:

In 1979, the New Hampshire Water Supply and Pollution Control Commission notified KMC that discharges to the ground and septic system were not permitted. In response to this notification, KMC began to containerize and store its wastes in and near the foundry building.

KMC went out of business in 1982 and was placed on the EPA's National Priorities List (NPL) in 1984 after investigations showed that ground water under the Site was contaminated with volatile organic compounds (VOCs), including 1,1,1-trichloroethane (1,1,1-TCA). Evidence of industrial waste, by-products of the cast-making processes, were found on the Site. A large, 15-foot-high pile of approximately 9,000 cubic yards of solid waste and a smaller pile of approximately 400 cubic yards of waste were also found on the Site.

In 1990, EPA issued a cleanup plan for the Site called a *Record of Decision (ROD)* which required that both source control and management of migration components be implemented to obtain a comprehensive remedy. The selected remedy specified in the ROD included the following components:

1. Source Control -

- Removal and disposal of the septic tank and its contents to an off-site incinerator for destruction.
- Excavation and disposal of contaminated leach field soils at a permitted off-site facility.
- Excavation and off-site disposal of materials from the two waste piles.

2. Management of Migration -

- Extraction of contaminated groundwater via extraction wells or trenches.
- Treatment of extracted groundwater via air stripping and carbon polishing.
- Discharge of treated groundwater to the Publically Owned Treatment Works (POTW).
- Long-term environmental monitoring.

In 1991, EPA removed seven drums and two pails of hazardous materials from the northern most building (Building #2) on the KMC property.

Between the summer and fall 1992, EPA removed the waste piles, the septic tank and its contents, and the leach field soils from the Site. Approximately 13,620 tons of waste pile materials were excavated (along with 42 tons of crushed drums taken from the waste piles) and transported off-site for disposal in a municipal solid waste landfill. The contents of the septic tank (approximately fourteen 55-gallon drums of material) were also transported off-site for disposal at a hazardous waste incinerator. In addition, approximately 12 cubic yards of leach field soils and the associated concrete septic tank were excavated and transported off-site for disposal at a solid waste landfill, and two 55-gallon drums of corrosive solids were disposed of at a hazardous waste landfill.

In the spring of 1993, EPA began construction of the groundwater pump and treat system. In addition, 23 monitoring wells were installed to supplement those monitoring wells previously installed, three rounds of groundwater samples were collected, and surface water and sediment samples from the Pequawket Pond were obtained. By the fall of 1993, the pump and treat system was fully operational pumping at a rate of approximately 42 gallons per minute. The system included 14 extraction wells located on the KMC, OCR and Conway Business Park properties, and a 50' x 100' treatment building located at the northern end of the KMC property.

In 1996, two of the original extraction wells were taken off-line as ground water cleanup levels had been attained in the vicinity of these wells. In 2000, one of the original extraction wells was replaced with a 75 foot long extraction trench and a new extraction well. This trench and extraction well were installed on OCR, Inc. property (northeast of Building #1 on the KMC property) to enhance collection of the highest groundwater contamination on the Site.

Following continued evaluation of groundwater monitoring data from the Site and the collection of several geoprobe soil samples in 2002, it was determined that additional soil contamination existed in the area between the KMC foundry building (Building #1) and the surface water catch basins/storm drain that currently bisects the OCR Inc., parcel. In the fall of 2003, NH DES contracted to dismantle portions of the groundwater extraction system, perform additional soil excavation and off-site disposal activities, and install a new groundwater recovery system on the Site. These activities were performed from October

2003 thru January 2004 and a total of 5,667 tons of material was transported off-site. Pumping from the new recovery system began in February 2004 and continues today. The excavation area was regraded/reseeded, and approximately 1275 poplar trees were planted in the spring of 2004 to further assist in the cleanup of the groundwater (see cover photo).

Status of Cleanup Activities:

The soil cleanup goals specified in the 1990 ROD for the waste piles, septic tank and leach field were achieved as the result of soil excavation activities completed in 1992. In addition, the soil excavation and off-site disposal activities undertaken in 2003-2004 have also removed highly contaminated soils from the Site which will expedite the cleanup of groundwater in order to achieve the goals specified for the groundwater in the ROD (i.e., drinking water standards).

Groundwater extraction and treatment activities have been ongoing since 1993. The groundwater cleanup remedy is functioning as intended. Although groundwater contaminant concentrations and the areal extent of the contaminant plume at the Site have significantly decreased (see attached Figures 6-16 & 7-1), there are still exceedances of the groundwater cleanup goals for select contaminants of concern. These exceedances are primarily found on both the KMC and OCR properties in the area of the new recovery system installed in February 2004. Recent groundwater data for the Hobbs Street extraction wells, located on the Conway Business Park property, suggest that clean up is complete in this area of the Site. These extraction wells have subsequently been temporarily shut down in order to perform follow-up groundwater monitoring to verify that the cleanup standards have been achieved in accordance with the 1990 ROD.

NH DES has been a strong partner with EPA throughout the investigation and clean-up activities at the Site. Currently, under the terms of a May 2004 Cooperative Agreement between EPA and NH DES, full responsibility for the operation and maintenance of the Site has been turned over to NH DES.

SECTION 2 - REUSE STATUS

This section provides a general summary of the current and potential future uses of the Site. Potential use / reuse considerations are also discussed. This summary is based on information that was readily available to the EPA case team. Important sources of information include the following:

- Record of Decision, September 1990.
- Superfund Site Preliminary Close Out Report, September 1993.
- Five-Year Review Report, September 2003.
- Source Removal Action Completion Report, June 2004.

The Site currently consists of the following three properties:

- Kearsarge Metallurgical Corporation - Map 227, Lot 140 (formerly Map 27, Lot 8)
- OCR, Inc. - Map 227, Lot 139 (formerly Map 27, Lot 7)
- Conway Business Park, LLC - Map 227, Lot 182 (formerly Map 27, Lots 50 & 50A)

Kearsarge Metallurgical Corporation Property

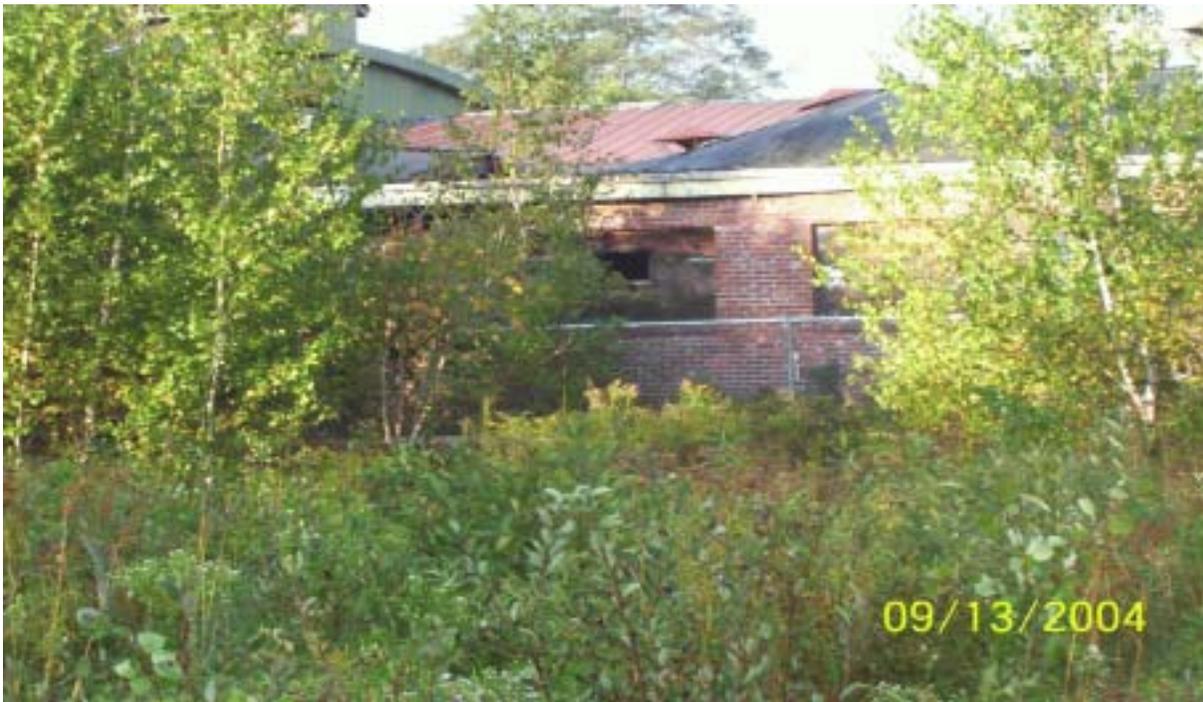
Background: The 4-acre KMC property is located on Hobbs Street in the village of Conway within the Town of Conway, NH where it manufactured precision stainless steel castings from 1964 until it went out of business in 1982. The property is flat-lying, is adjacent to Pequawket Pond and is in the 100-year flood plain of the pond.

Two buildings were once used during operations on the KMC property. Building #1 was historically used for foundry operations, while Building #2 was used for shipping and receiving materials (see attached Figure 3). Building #2 has since been razed and Building #1 has fallen into disrepair, with large portions open to the elements and a great deal of structural damage to the walls and roof.

In 1990, a Federal Lien was recorded on the KMC property at the Carroll County Registry to secure payment to the United States of costs and damages for which KMC is liable under Section 107(a) of CERCLA. The costs and damages at that time included \$290,405 in expenditures for response actions, including investigatory work at the Site, any future costs and damages incurred by the United States, and interest.

In 1993, EPA constructed a 50' x 100' steel building on the former location of KMC's Building #2 to house a groundwater treatment plant. This building is still in place and the groundwater treatment system continues to operate. In addition, there are a number of groundwater monitoring/extraction wells and piping for the groundwater recovery system located on the property (see attached Figure 2). This building is provided with all appropriate sewer, water and electrical power connections.

The property is posted. A chain link fence is also located around the dilapidated Building # 1 to keep trespassers out (see photos on next page).



Building #1 at the Kearsarge Metallurgical Corporation Superfund Site.

Extensive removal of the soils was completed in 1992 and again in 2003-2004. No further soil cleanup is expected. The remaining soils meet standards for “unrestricted use”, meaning they are acceptable for all uses including residential.

Current Uses: The property has been abandoned by KMC for several years, as the owner has declared bankruptcy. The groundwater treatment facility remains in place and continues to operate on the northern end of the property.

Potential Future Uses: The Town of Conway has expressed an interest in reusing the KMC property. According to the Towns’ Master Plan (adopted May 29, 2003), which addresses the collective vision of the residents of Conway about how land should be preserved or developed in the community; the community has grappled with a wide variety of transportation, community design, infrastructure, recreation and development related issues. Reuse of the KMC property is included as an objective in the Master Plan which states that the town should “Develop a plan for the redevelopment and eventual reuse of the Kearsarge Metallurgical brownfield site for passive recreational uses that provides connections to the surrounding neighborhoods.”

Although the town does not currently own or lease the property, it is interested in seeing the property redeveloped and is in a position to possibly acquire the property through involuntary acquisition, such as a tax foreclosure or eminent domain taking. In the past, EPA has worked with the Town of Conway to acquire the property under a prospective purchaser agreement; however, in the end, the town declined taking the property because EPA was unable to tear down Building #1 under Superfund. The town is interested in revitalizing the entire area of town where the KMC property is located, about 2 -3 city blocks of commercial/industrial-zoned property, because it is not functioning to its full potential.

The current vision for the property includes working out a deal with a private company for reuse such that a business might become a flagship anchor on the KMC property that facilitates the turn around of the entire area. In addition, the town has received property along the pond which is coming into public ownership as part of mitigation for nearby road construction work. The town is creating a shoreline buffer and trails along the pond.

The Town of Conway is interested in putting the KMC property and nearby properties back into productive use. While the town could take the KMC property for back taxes, up until this time it has chosen not to. Before moving to acquire the property, the Town of Conway would like EPA and NH DES to confirm that the cleanup is complete. In addition, the town is interested in structuring an agreement that will shield the town and any potential developer from liability for the Site.

Potential Reuse Issues/Considerations: Factors that could potentially impact the reuse of this Site include:

(1) Stigma

There is the perception among some in the community that “once a site is a Superfund site, it is always a Superfund site,” despite existing data which demonstrates that things have been cleaned up. There is some concern that the Site is still impacting nearby Pequawket Pond and that the pond should not be used for recreational purposes.

(2) Liability

The main issue which the town articulated as being a hurdle to redevelopment of the KMC property is how to structure an agreement which will shield the town and any future developer from liability. Recent changes to the Superfund Law through the Brownfields amendment may be of some assistance to the town.

(3) Timing

The town is interested in acquiring the property and is waiting for a clear signal from EPA and NH DES that the Site is ready for reuse before pursuing acquisition.

(4) Existing Buildings

The town would like to know the status of Building #1 on the property, and would like to know more about the potential use of this building or the need to remove it. In addition, the town is interested in the potential future uses of the equipment in the groundwater treatment building and the structure itself.

(5) Institutional Controls

Institutional controls on ground water were not called for in the 1990 ROD since the Site is located in an industrial park, and residents near the Site use municipal drinking water supplied by the Conway Village Fire District. The Superfund clean up has established a goal of returning the ground water to drinking water standards; however, this has not yet been achieved for the ground water on the KMC property. EPA has not placed any restrictions on the use of the property since the soil cleanup goals that were established in the 1990 ROD have been achieved and, therefore, allow for “unrestricted” use.

General Findings:

(1) Reasonably-Anticipated Future Land Use (RAFLU)

The future use of the KMC property is uncertain since it is currently abandoned and there are no known plans for reuse. Continued use of the property for industrial/commercial purposes remains a possibility. This use would be consistent with the current zoning and would reflect one of the potential uses suggested by town officials should the town decide to acquire the property. Passive recreation was another potential re-use scenario suggested by the town. Other possible uses could include residential, although this may require a zoning change. All of these uses would be in keeping with the soil clean up levels, which allow for “unrestricted” use.

Recommendations:

(1) Liability Concerns

It will be important for EPA and NH DES to work with local officials and potential purchasers/redevelopers to help clarify liability issues so that the town can properly assess whether to acquire the property and how best to minimize any potential liability. Among the specific concerns raised by the town are:

- The Town's liability if they obtain ownership.
- A developer's liability if they acquire the property. This issue could potentially impact the marketability of the property.

Some of the available options include:

- Statutory Exemptions. There are certain liability protections afforded under the Superfund statute and recent amendments, such as the Small Business Liability Relief and Brownfields Revitalization Act (commonly referred to as the "Brownfields Law"). Among the entities potentially covered are municipalities, lenders, and prospective purchasers.

Municipalities may not be held liable for Superfund cleanup costs if they take ownership through what is termed an "involuntary acquisition", such as a tax foreclosure. However, this liability protection is subject to certain conditions. For instance, a municipality could be responsible for cleanup costs arising from its activities that cause, or contribute to, the further release of hazardous substances (e.g., breaching a landfill cover, damaging a ground water treatment system, etc.). The Brownfields Law also includes provisions for bonafide prospective purchasers that may be applicable to developers who might acquire the property in the future. Again, this liability protection is subject to certain conditions.

- Commercially-Available Insurance Products. There are a wide variety of insurance products currently available. Although these products cannot eliminate Superfund liability, they can limit financial exposure and can be useful in securing loans from lending institutions. Typically, the premiums reflect the insurer's perception of financial risk, so that properties with contamination left in place may be expected to pay a higher cost for its coverage.
- Ready-for-Reuse Determinations. EPA has recently implemented a new initiative whereby it can determine that all or certain portions of a Site are available for either "restricted" or "unrestricted" use. This determination and the specific nature of any restrictions (e.g., institutional controls, prohibited uses, etc.) are summarized in a supporting document that can be made available to property owners, developers and other interested parties. These determinations are intended to promote earlier use of Superfund sites.

(2) Future Use of the Treatment Building

The potential availability of the treatment building could be a key factor in the town's decision to acquire the KMC property. The likely timing and circumstances for a potential future conveyance to the town will need to be further explored.

(3) Stigma

Stigma often remains a concern at Superfund sites because local stakeholders have long memories of the past history and a tendency to treat a site with suspicion. This is particularly true of sites where soil contamination will be left on-site which, fortunately, is not the case for any of the properties located within this Site. Properties that remain underutilized and fenced-in, even after the clean up is complete, also make it more difficult to remove any lingering stigma.

It is therefore important that EPA and the NH DES work closely with local communities, potential developers, and other stakeholders to help address any questions and concerns regarding the clean up and appropriate reuse of this Site. Administrative tools, such as the "ready-for-reuse determinations" noted above may prove useful in communicating this information.

OCR, Inc. Property

Background: This property consists of 5-acres of undeveloped land located east of the former KMC facility. The property is flat-lying, contains significant wooded wetlands, is adjacent to Pequawket Pond, and is in the 100-year flood plain of the pond. The most recent owner of record is OCR, Inc. as part of a land trust. This property was identified as a source area for the current ground water contamination due to disposal of waste from the KMC operations onto this property. This property is included within the KMC Superfund Site boundaries.

Extensive removal of the soils was completed in 1992 and again in 2003-2004. No further soil cleanup is expected. The remaining soils meet standards for "unrestricted use", meaning they are acceptable for all uses including residential.

Current Uses: Open space (with over 1,000 poplar trees recently planted on the surface as part of ongoing clean up work; see cover photo) as well as wetlands located throughout the property. A majority of the ongoing ground water extraction and monitoring well system are located throughout this property. In addition, a north-south oriented storm drainage pipe with four open-bottomed catch basins bisects the property; originating at the parking lot on the Yield House Renovation Supply, Inc. property and eventually discharging into Pequawket Pond (see attached Figure 2).

Potential Future Uses: Uncertain. There are no known plans for reuse of this property other than what may or may not be associated with redevelopment of the adjacent KMC property in the future.

Potential Reuse Issues/Considerations: The proximity of this property to Pequawket Pond, the forested wetlands on and adjacent to this property, and the fact that the property is within the 100-year flood plain could significantly hinder future redevelopment. Additionally, there are currently various structures associated with the on-going ground water clean up which would create physical barriers that may limit reuse until such time that this system is decommissioned. Finally, the property is bisected by a surface water catch basin/drainage system the runs from north to south.

General Findings:

(1) Reasonably-Anticipated Future Land Use (RAFLU)

There is considerable uncertainty regarding the future use of this property. Although the area is zoned industrial, wetland and flood plain regulations could significantly restrict future construction. However, the proximity of the property to the pond and other wetland areas could make the property amenable to passive/active recreation following the decommissioning of the ground water extraction/monitoring system and other structures.

(2) Stigma

Stigma often remains a concern at Superfund sites because local stakeholders have long memories of the past history and a tendency to treat a site with suspicion. This is particularly true of sites where soil contamination will be left on-site which, fortunately, is not the case for any of the properties located within this Site. Properties that remain underutilized and fenced-in, even after the clean up is complete, also make it more difficult to remove any lingering stigma.

It is therefore important that EPA and the NH DES work closely with local communities, potential developers, and other stakeholders to help address any questions and concerns regarding the clean up and appropriate reuse of this Site. Administrative tools, such as the “ready-for-reuse determinations” noted above may prove useful in communicating this information.

Recommendations:

No specific recommendations.

Conway Business Park, LLC Property

Background: This parcel of land was formerly owned and operated by Carroll Industries, a manufacturer of laminated wood products. It is currently owned by Conway Business Park, LLC and is used primarily for office space and storage.

At present, four (4) ground water extraction wells and associated piping along with several monitoring wells remain on a small portion of this property directly abutting Hobbs Street. The area of the property which includes these remediation systems involves approximately 0.75-acres out of a total of 7.4 acres. As previously noted, the extraction wells on this

parcel have been temporarily shut down in order to perform follow-up groundwater monitoring to verify that the ROD cleanup goals have been achieved throughout this portion of the Site (see attached Figure 2).

This property has never been identified as a source area for the contamination that resulted in the listing of the Kearsarge Metallurgical Superfund Site. However, a contaminated ground water plume originating at the KMC property has come to be located under this property. No soil remediation has occurred and the soils are considered acceptable for “unrestricted use.”

Current Uses: The current owner of the property, Mr. Thomas Mullen, has owned the business park for the past 5-6 years. Mr. Mullen indicated during an interview as part of the Five-Year Review performed in 2003 that he had no opinion of the cleanup, but had several questions at the time:

(1) How long will the wells on his property remain? What restrictions does their presence place on development of his property? Are there any official restrictions to redevelopment of his property? How can he get financing for his property?

(2) A former tenant noted sewer gases infiltrating their building - the town indicated that it was likely due to the KMC treatment plant discharge to the sewer system in the area. He wanted to know if this is really true and how can it be mitigated. EPA and NH DES have investigated this situation and do not believe that the KMC plant discharge was the source of these gaseous emissions.

Potential Future Uses: There is no reason for EPA to assume that this property will not continue to be used for commercial/industrial purposes. The business park that has operated there for the past 5-6 years appears viable and EPA is unaware of any plans to change that use. NH DES has indicated that Mr. Mullen, the current property owner, is very interested in exploring options for development of the parcel across from the KMC treatment plant, but has historically been reluctant to do so due to the on-going cleanup activities. NH DES is planning on keeping Mr. Mullen abreast of the results from the verification phase of groundwater sampling on his property, and will be providing him with a status memorandum which may help to encourage future reuse of the property.

Potential Reuse Issues/Considerations: The existing groundwater extraction and monitoring wells that are located on approximately 0.75-acres of this property may be an impediment to redevelopment in this limited area in the short-term. NH DES is currently evaluating the groundwater contaminant concentrations in this area to determine whether the cleanup goals required by the 1990 ROD have been achieved and if any precautionary measures would be required for development. Consequently, there appear to be few obstacles to developing this portion of the subject property.

General Findings:

(1) Reasonably-Anticipated Future Land Use (RAFLU)

EPA anticipates that the Conway Business Park, LLC property will continue to be used for commercial/industrial purposes for the foreseeable future.

Recommendations:

(1) Land use restrictions

Following a determination by EPA and NH DES as to whether the ground water extraction/monitoring system can be decommissioned, these agencies will convey that information to the owner and tenants of the business park and coordinate future activities regarding their decommissioning or continued operation.

Appendix A - Reference Documents

- Record of Decision, September 1990.
- Superfund Site Preliminary Close Out Report, September 1993.
- Five-Year Review Report, September 2003.
- Source Removal Action Completion Report, June 2004.

M:\Design\DWG\KARSARGE\SARA 5-year Review\Figure 3-2.dwg, Layout1, 9/22/2003 11:57:01 AM, gbrandeb, 1:1

FORMER: MAP 27, LOT 9
NEW ENGLAND EMBROIDERY
CURRENT: MAP 227, LOT 143
FRICK AND FRACK, LLC.

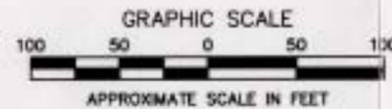
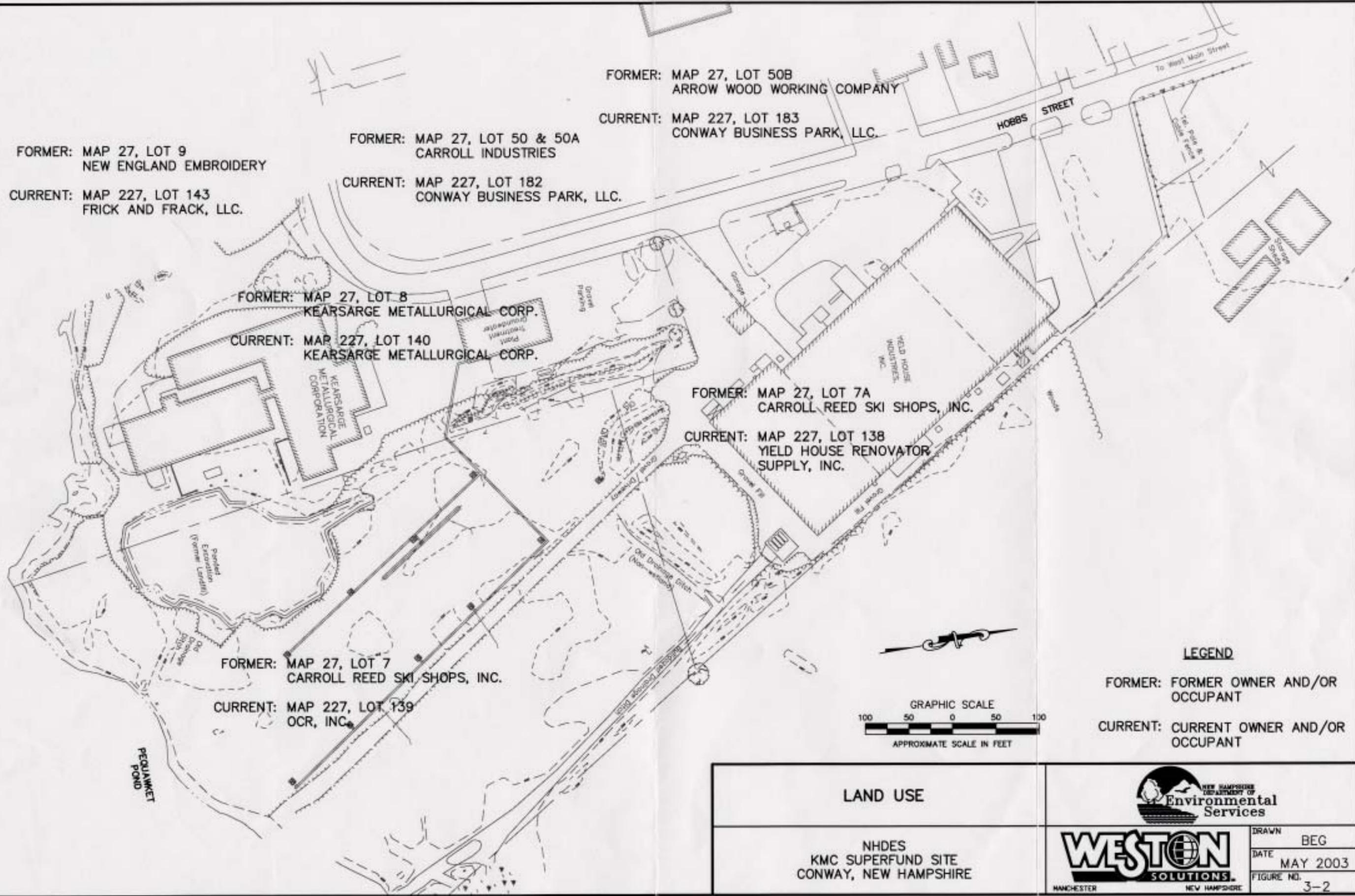
FORMER: MAP 27, LOT 50 & 50A
CARROLL INDUSTRIES
CURRENT: MAP 227, LOT 182
CONWAY BUSINESS PARK, LLC.

FORMER: MAP 27, LOT 50B
ARROW WOOD WORKING COMPANY
CURRENT: MAP 227, LOT 183
CONWAY BUSINESS PARK, LLC.

FORMER: MAP 27, LOT 8
KEARSARGE METALLURGICAL CORP.
CURRENT: MAP 227, LOT 140
KEARSARGE METALLURGICAL CORP.

FORMER: MAP 27, LOT 7A
CARROLL REED SKI SHOPS, INC.
CURRENT: MAP 227, LOT 138
YIELD HOUSE RENOVATOR
SUPPLY, INC.

FORMER: MAP 27, LOT 7
CARROLL REED SKI SHOPS, INC.
CURRENT: MAP 227, LOT 139
OCR, INC.

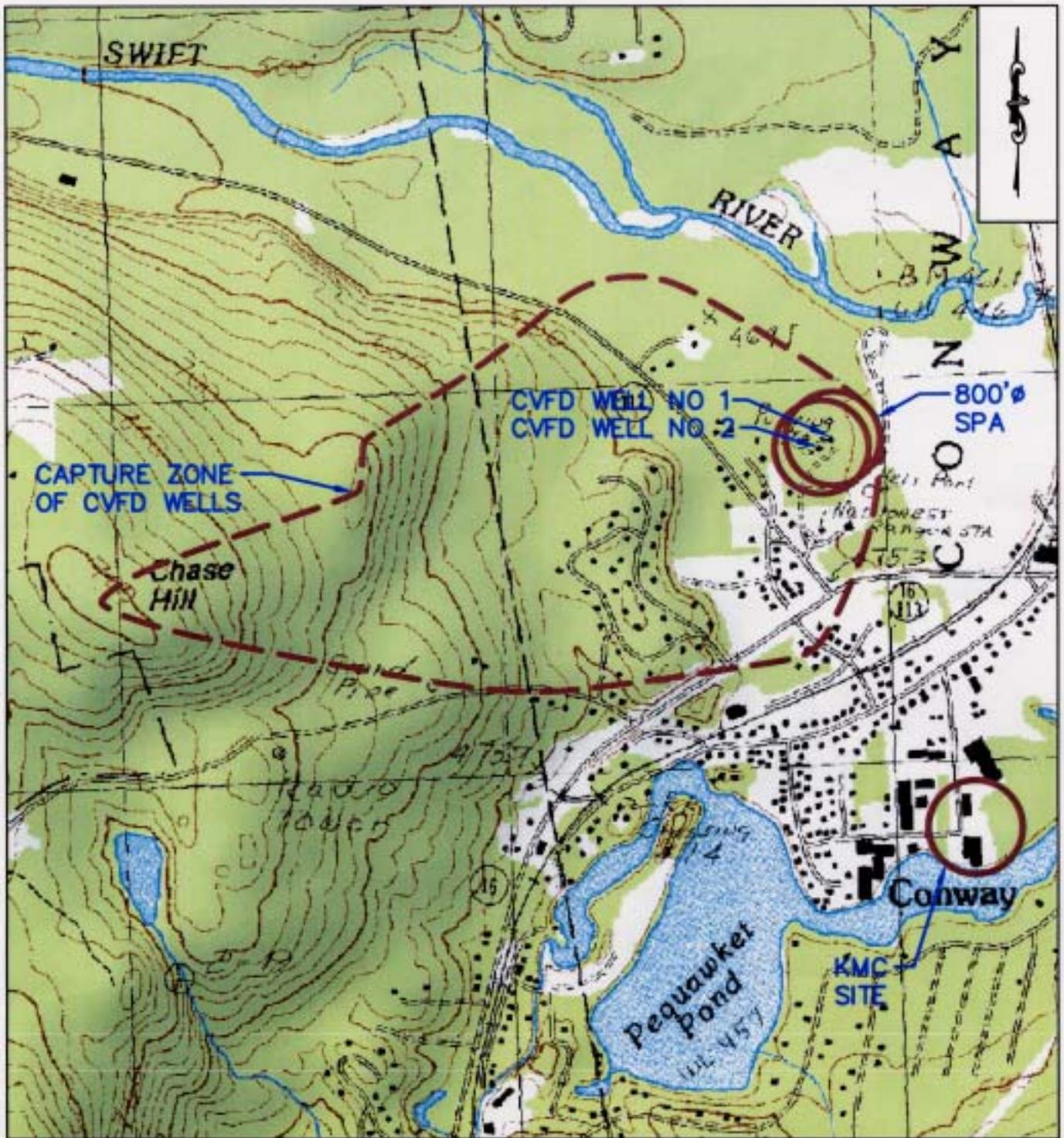


LEGEND

FORMER: FORMER OWNER AND/OR
OCCUPANT
CURRENT: CURRENT OWNER AND/OR
OCCUPANT

<p>LAND USE</p>	 <p>NEW HAMPSHIRE DEPARTMENT OF Environmental Services</p>						
<p>NHDES KMC SUPERFUND SITE CONWAY, NEW HAMPSHIRE</p>	 <p>MANCHESTER NEW HAMPSHIRE</p> <table border="1" data-bbox="2759 1770 2977 1911"> <tr> <td>DRAWN</td> <td>BEG</td> </tr> <tr> <td>DATE</td> <td>MAY 2003</td> </tr> <tr> <td>FIGURE NO.</td> <td>3-2</td> </tr> </table>	DRAWN	BEG	DATE	MAY 2003	FIGURE NO.	3-2
DRAWN	BEG						
DATE	MAY 2003						
FIGURE NO.	3-2						

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NHDES
KMC SUPERFUND SITE
CONWAY, NEW HAMPSHIRE



CVFD SOURCE WATER
PROTECTION AREA BOUNDARY



DRAWN BEG
DATE JUN 2003
FIGURE NO. 5-1

MANCHESTER NEW HAMPSHIRE

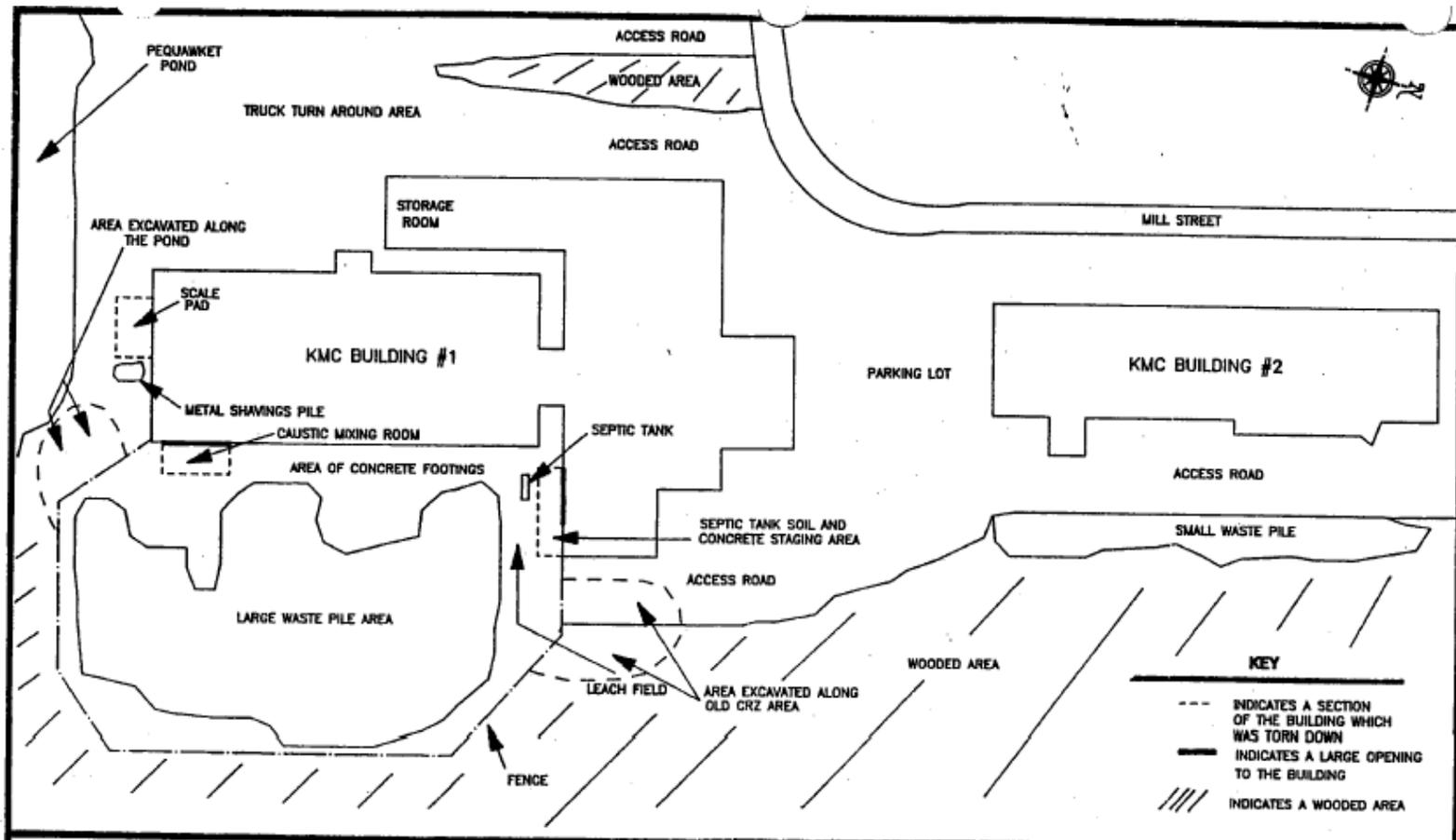
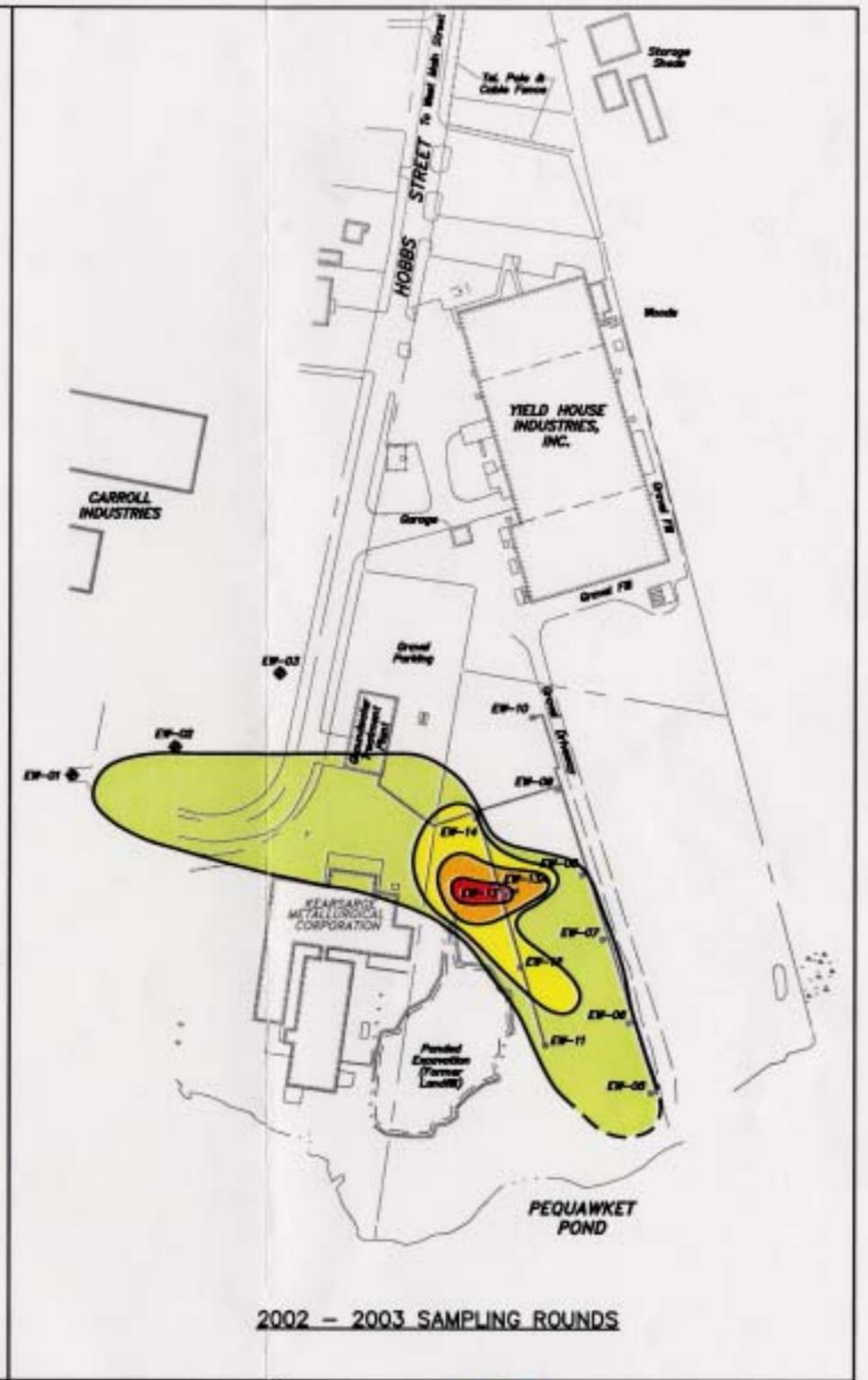
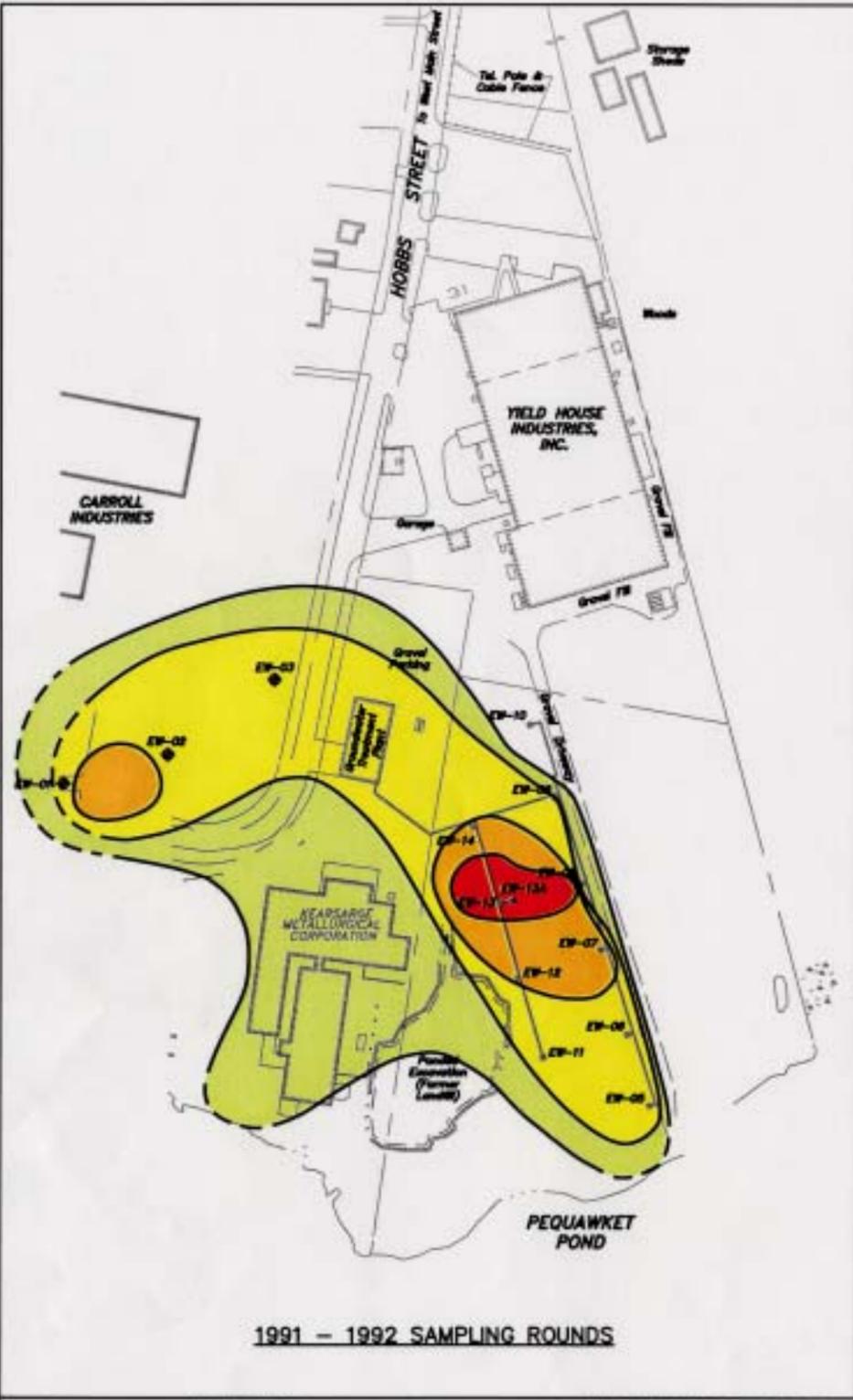


FIGURE 3
 SITE DIAGRAM
 KEARSARGE METALLURGICAL COMPANY SITE
 CONWAY, NEW HAMPSHIRE

NOT TO SCALE

WESTON			
DRAWN	SUMNER	DATE 10/92	PCS # 4005
APPROVED	<i>SJM</i>	DATE 12/92	TOD # 01-9210-05

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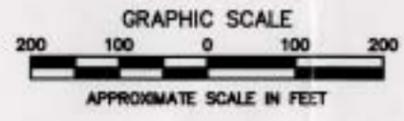


LEGEND

	>10,000 ppb TOTAL VOC's
	>1,000 ppb TOTAL VOC's
	>100 ppb TOTAL VOC's
	>CLEANUP GOALS

CLEANUP GOALS

1,1,1-TCA	200 ppb
1,1-DCA	4 ppb
1,1-DCE	7 ppb
1,2-DCA	5 ppb
TCE	5 ppb



**TOTAL VOC CONCENTRATIONS
IN GROUNDWATER
(EXISTING CLEANUP GOALS)**

NHDES
MCM SUPERFUND SITE
CONWAY, NEW HAMPSHIRE



NEW HAMPSHIRE
DEPARTMENT OF
Environmental Services



WESTON SOLUTIONS
MANCHESTER NEW HAMPSHIRE

DRAWN	A.J.M.
DATE	SEP. 2003
FIGURE NO.	6-16

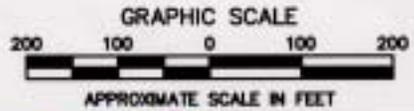


LEGEND

	>10,000 ppb TOTAL VOC's
	>1,000 ppb TOTAL VOC's
	>100 ppb TOTAL VOC's
	>CLEANUP GOALS

REVISED CLEANUP GOALS

1,1,1-TCA	200 ppb
1,1-DCA	81 ppb (NH AGQS)
1,1-DCE	7 ppb
1,2-DCA	5 ppb
TCE	5 ppb



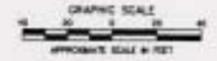
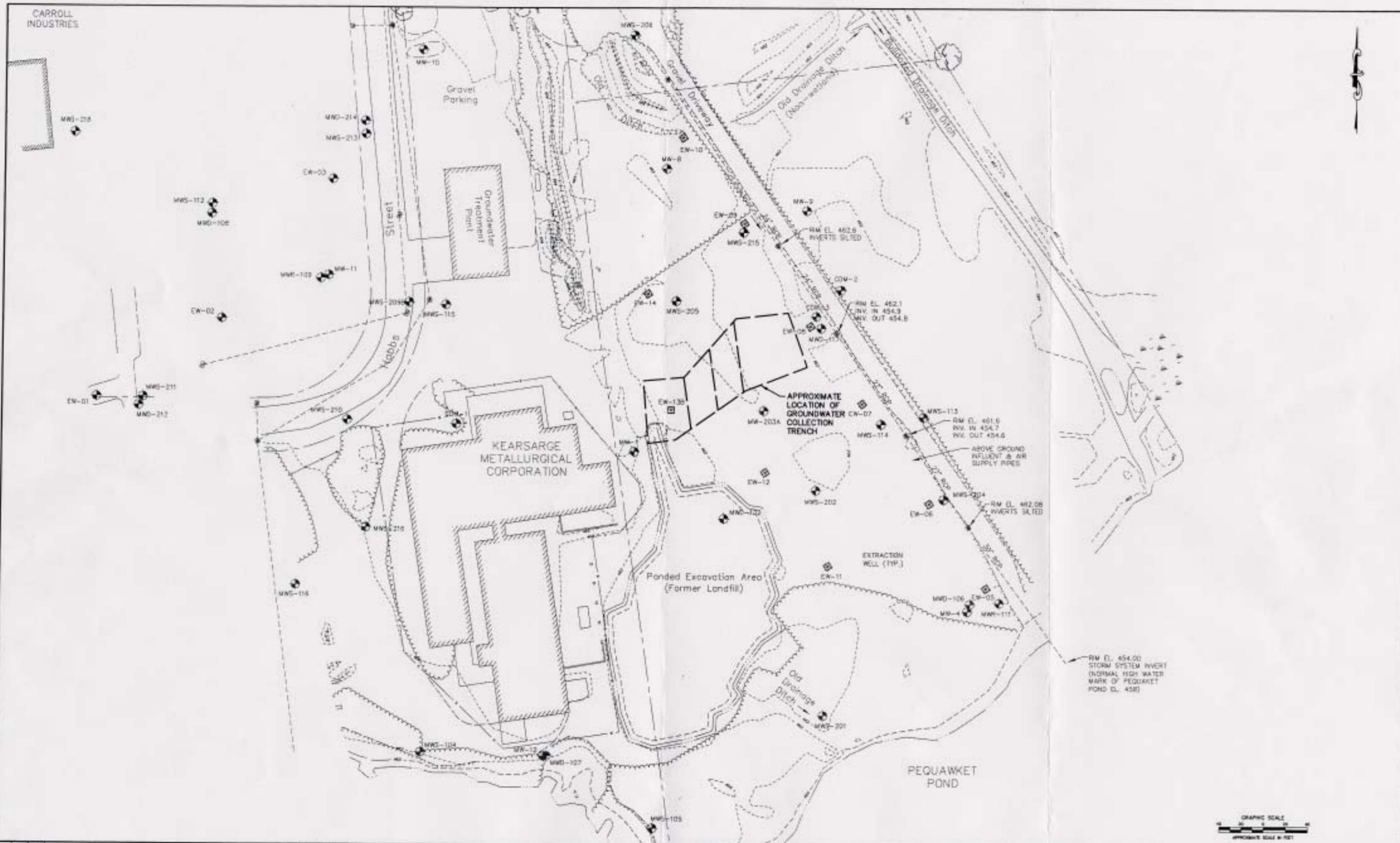
TOTAL VOC CONCENTRATIONS IN GROUNDWATER
 (REVISED CLEANUP GOAL FOR 1,1-DCA)

NHDES
KMC SUPERFUND SITE
CONWAY, NEW HAMPSHIRE



MANCHESTER		NEW HAMPSHIRE	
DRAWN	DATE	DES. ENG.	DATE
A.J.M.	SEP. 03		
CHECKED	DATE	APPROVED	DATE
			W.O. NO. 01395-022-008
			FIGURE NO. 7-1

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NO.	DATE	APP.	REVISION

NHDES
KMC SUPERFUND SITE
CONWAY, NEW HAMPSHIRE

WESTON
SOLUTIONS

DESIGN	DATE	STATUS	APPROVAL	DATE



OPERATIONS SITE PLAN (POST OCTOBER 2003)			
DATE	S.T.D.	DATE	MARCH 2004
SCALE	AS SHOWN	FILE NO.	01395.022.009