DECLARATION FOR THE EXPLANATION OF SIGNIFICANT DIFFERENCES

NEW HAMPSHIRE PLATING COMPANY SUPERFUND SITE

SEPTEMBER 2007

SITE NAME & LOCATION

New Hampshire Plating Company Superfund Site, Merrimack, New Hampshire

IDENTIFICATION OF LEAD & SUPPORT AGENCIES

Lead Agency: **United States Environmental Protection Agency (EPA)**

Support Agency: **New Hampshire Department of Environmental Services (NHDES)**

STATEMENT OF PURPOSE

This decision document sets forth the basis for the determination to issue the attached Explanation of Significant Differences (ESD) for the New Hampshire Plating Company Superfund Site (NHPC Site or Site) located in Merrimack, New Hampshire. This ESD focuses on adjustments to the soil excavation and treatment component of the remedial action and reflects the changed performance standard for cadmium in soils in the northern wetland area of the Site.

STATUTORY BASIS FOR ISSUANCE OF THE ESD

Section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), requires that, if the remedial action being undertaken at a site differs significantly from the Record of Decision (ROD) for that site, EPA shall publish an ESD between the remedial action being undertaken and the remedial action set forth in the ROD and the reasons for the changes to the remedial action. Section 300.435(c)(2)(i) of the National Contingency Plan (NCP) and EPA guidance (Office of Solid Waste and Emergency Response (OSWER) Directive 9200.1-23P, July 1999) 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.

EPA has determined that the adjustments to the 1998 ROD for the NHPC Site, as explained in this ESD, are significant but do not fundamentally alter the overall remedy for the Site with respect to scope, performance, or cost. Therefore, this ESD is being properly issued. In accordance with Section 117(d) of CERCLA and Section 300.825(a) of the NCP, this ESD will become part of the Administrative Record for the Site, and will be available for public review at both the EPA Region 1 Record Center in Boston, Massachusetts, and the Merrimack Public Library, 470 Daniel Webster Highway, Merrimack, New Hampshire.

BACKGROUND

The September 1998 ROD for the NHPC Site selected a remedial action that will prevent or minimize the continued release of hazardous substances to the groundwater and provide for the management of migration of groundwater. In summary, the selected remedy consisted of the following major components:

1. Treating approximately 40,000 cubic yards of metal-contaminated soils by in-place chemical fixation;

2. Consolidating and backfilling all treated soils in former lagoons 1 and 2;

3. Crushing, testing and treating the storage-cell material, as necessary, on-site using the chemical fixation process and placing treated material in former lagoons 1 and 2 area;

4. Placing two feet of clean soils over the treated materials in the lagoons 1 and 2 area;

5. Re-grading and vegetating the Site using appropriate wetlands-type plants and grasses, and assuring adequate flood-storage capacity;

6. Performing restoration of contaminated groundwater in the shallow and deep overburden aquifers by natural attenuation;

7. Establishing a groundwater monitoring network for annual groundwater monitoring;

8. Installing two well clusters in the Town of Litchfield for long-term monitoring;

9. Annually sampling surface water from the Merrimack River and Horseshoe Pond;

10. Establishing institutional controls to implement both land and groundwater use restrictions, including a Groundwater Management Zone (GMZ) pursuant to the New Hampshire Code of Administrative Rule Env-Ws 410.26; and

11. Mitigating unavoidable impacts to on-site wetlands through the preservation of the Grassy Pond area in Litchfield and an additional wetland area to be determined in the Town of Merrimack.

All the above components of the remedial action are either complete or underway.

OVERVIEW OF THIS ESD

Based on information and data generated since the issuance of the 1998 ROD, as well as completion of several actions specified in the 1998 ROD, the source control portion of the 1998 ROD has been modified.

Change to the Soil Treatment Method - A component of the 1998 ROD called for in-place treatment of metal-contaminated soils via chemical fixation in 12-foot lifts. After in-place treatment, the ROD envisioned that the treated soils would be excavated from its location, and

stockpiled and tested somewhere else on-site. Remaining underlying contaminated soils would continue to be treated in-place and excavated until the treatment process was completed. Bench scale tests conducted in 2000 to verify the chemical fixation process found that in-place treatment as conceptualized in the ROD was not viable for the Site because of the heterogeneous nature of the soils, the presence of multiple metal contaminants of concern, and the need to ensure adequate mixing of soil and chemical fixation reagents. As a result, in order to retain the 1998 ROD's key feature of on-site treatment of contaminated soils by chemical fixation, ex-situ soil treatment was identified as the most appropriate method to ensure proper application and mixing of the reagents with the contaminated soils.

Change to the Treated Soil Backfill Location - The 1998 ROD called for treated soils to be backfilled in former lagoons 1 and 2. During the performance of the remedial action, over 60,000 cubic yards of contaminated soils were excavated and treated, significantly exceeding the estimate in the 1998 ROD of 40,000 cubic yards. Because of the extra soils requiring backfilling and the need to maintain flood storage capacity, limiting the backfilling of treated soils to former lagoons 1 and 2 was determined to be inappropriate. As a result, treated soils were also backfilled in the former southern wetland area and the former building area.

Change in Cadmium Soil Cleanup Level in the Northern Wetland Area – EPA has determined that it is appropriate to change the soil cleanup level for cadmium in the northern wetland area from 1.78 milligrams per kilogram (mg/kg) to 3.92 mg/kg. This cleanup level has been attained as a result of the performance of the remedial action at the northern wetland area.

The 1998 ROD set soil cleanup levels for five separate source areas on the Site. The cleanup levels for cadmium ranged from 1.78 to 6.42 mg/kg and were established to protect the aquifer from soil leachate. At these levels, the concentrations left in residual untreated soils would not be expected to impair future groundwater quality, and the timeframe for natural attenuation of groundwater contaminant levels to safe drinking water levels was determined to be 26 to 58 years.

An evaluation of the various factors led EPA to conclude that, to the greatest extent practicable, best efforts had been made to achieve the soil clean-up level for cadmium in the northern wetland area, and that this cleanup level should be changed to 3.92 mg/kg. This revised cleanup level is still protective of human health and the environment, and remains within the EPA human health acceptable risk range of 10^{-4} to 10^{-6} and a target organ hazard index of 1 for carcinogenic and non-carcinogenic risks, respectively. Furthermore, a soil cleanup level for cadmium of 3.92 mg/kg in the northern wetland area results in no appreciable increase in the timeframe for natural attenuation. At this revised soil cleanup level, the total natural attenuation time frame remains the same, at 26 to 58 years, based on revised groundwater modeling calculations. In addition, no change has been made to the 1998 ROD's institutional control requirements, which will restrict the consumption of groundwater for drinking water purposes until contaminant levels in groundwater have attenuated to safe drinking water levels.

DECLARATION

For the foregoing reasons, by my signature below, I approve the issuance of this Explanation of Significant Differences for the New Hampshire Plating Company Superfund Site in Merrimack, New Hampshire, and the changes stated therein.

James T. Owens III, Director
Office of Site Remediation and Restoration

9.28.07
Date

EXPLANATION OF SIGNIFICANT DIFFERENCES

New Hampshire Plating Company Superfund Site
Merrimack, New Hampshire

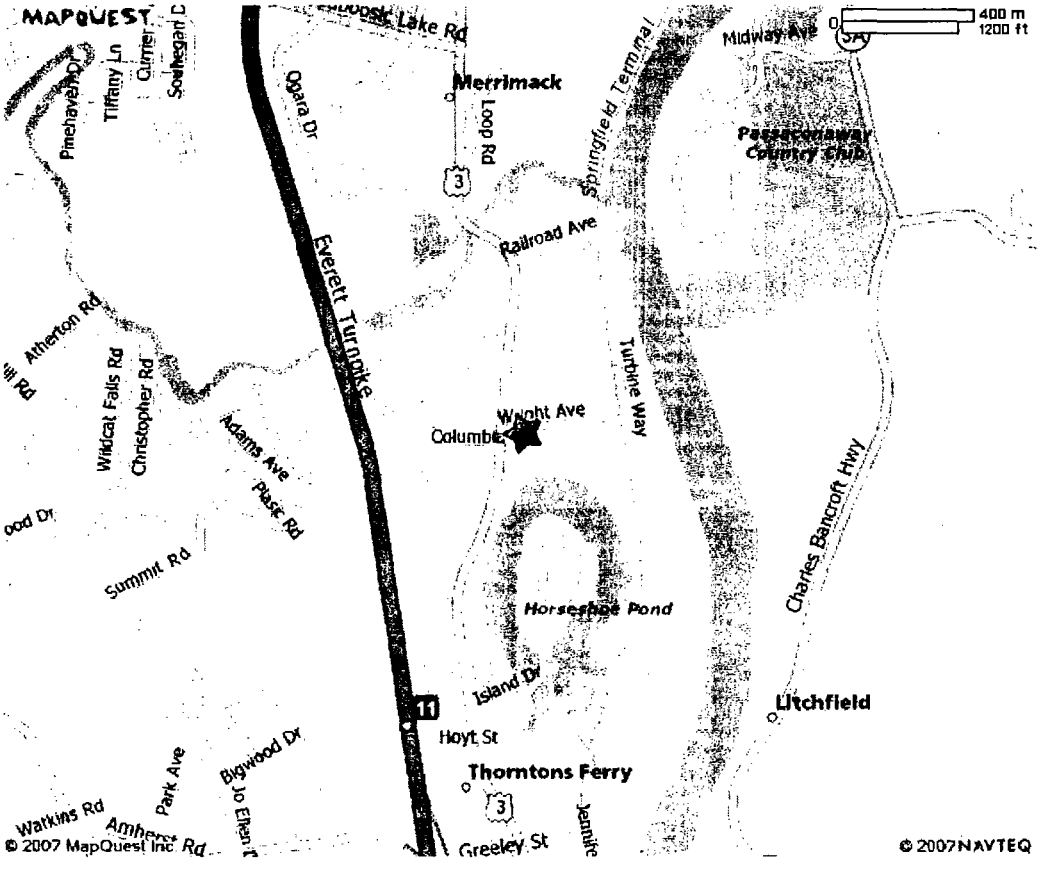
September 2007

I. INTRODUCTION

A. SITE NAME & LOCATION

Site Name: New Hampshire Plating Company Superfund Site

Site Location: Merrimack, New Hampshire



New Hampshire Plating Company Superfund Site

B. LEAD & SUPPORT AGENCIES

Lead Agency: United States Environmental Protection Agency (EPA)

- *Contact: James Chow, EPA Remedial Project Manager, (617) 918-1394*

Support Agency: New Hampshire Department of Environmental Services (NHDES)

- *Contact: Tom Andrews, NHDES Project Manager, (603) 272 -2910*

C. LEGAL AUTHORITY FOR ESD

In accordance with Section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (CERCLA), 42 U.S.C. § 9617(c), Section 300.435(c) of the National Contingency Plan (NCP), 40 C.F.R. § 300.435(c)(2)(i), and EPA guidance OSWER [Office of Solid Waste and Emergency Response] Directive 9200.1-23P (*A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*), 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), with respect to scope, performance, or cost, EPA shall publish an Explanation of the Significant Differences (ESD) between the remedial action being undertaken and the remedial action set forth in the ROD and the reasons such changes are being made.

D. SUMMARY OF CIRCUMSTANCES NECESSITATING THIS ESD

This ESD is being issued to explain modifications to the selected remedy as set forth in the September 28, 1998 ROD for the New Hampshire Plating Company Superfund Site (NHPC Site or Site). First, the 1998 ROD called for in-place treatment of metal-contaminated soils via chemical fixation in 12-foot lifts. After in-place treatment, the ROD envisioned that the treated soils would be excavated from its location, then stockpiled and tested somewhere else on-Site. Bench scale tests conducted in 2000 found that in-place treatment was not viable because of the heterogeneous nature of the soils, the presence of multiple metal contaminants of concern, and the need to ensure adequate mixing of soil and chemical fixation reagents. As a result, ex-situ soil treatment was identified as the most appropriate method to ensure proper application and mixing of the reagents with contaminated soils.

Second, the 1998 ROD called for treated soils to be backfilled in former lagoons 1 and 2. During the remedial action, over 60,000 cubic yards of contaminated soils were excavated and treated, significantly exceeding the estimate in the 1998 ROD of 40,000 cubic yards. In addition, high groundwater elevations reduced the capacity for backfilling in these areas. Because of the extra soils requiring backfilling and the need to maintain flood storage capacity, limiting the backfilling of treated soils to former lagoons 1 and 2 was determined to be inappropriate. As a result, treated soils were also backfilled in the former southern wetland area and the former building area.

Third, 1998 ROD established a soil cleanup level for cadmium of 1.78 milligram per kilogram (mg/kg) for the northern wetland area. During the remedial action,

contaminated soils in the northern wetland area were excavated to their greatest possible extent without causing significant structural damage to paved areas, utility lines, and other engineered features at the Site and on adjacent properties.

An evaluation of various factors led EPA to conclude that, to the greatest extent practicable, best efforts had been made to achieve the soil clean-up level for cadmium in the northern wetland area, and that this cleanup level should be changed to 3.92 mg/kg. This cleanup level is protective of human health and the environment and results in no appreciable increase in the timeframe for natural attenuation. At the soil cleanup level of cadmium of 3.92 mg/kg, the total natural attenuation time frame was determined to remain 26 to 58 years, based on revised groundwater modeling calculations.

E. AVAILIBILITY OF DOCUMENTS

This 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:

U.S. Environmental Protection Agency
Records Center
1 Congress Street
Boston, MA 02114
(617) 918-1440
Monday-Friday: 9:00 am - 5:00 pm; (closed first Friday of every month and federal holidays)

Merrimack Public Library
470 Daniel Webster Highway
Merrimack, New Hampshire
(603) 424-5021
Monday-Thursday: 9:00 am – 9:00 pm
Friday-Saturday: 9:00 am – 5:00 pm
Sunday: 1:00 pm – 5:00 pm

II. SUMMARY OF SITE HISTORY, CONTAMINATION PROBLEMS AND SELECTED REMEDIES

A. SITE HISTORY

The Site, located in the Town of Merrimack (Hillsborough County) in south central New Hampshire, is situated in an area with mixed land use, including light industries, commercial businesses, and a few private residential dwellings. Three major surface water bodies exist in the vicinity of the Site: Merrimack River, Horseshoe Pond, and Souhegan River. The immediate area is served by a public water supply.

The New Hampshire Plating Co. (NHPC) operated an electroplating facility on the 13-acre Site property from 1962 to 1985. During operation, the facility discharged electroplating wastes to a series of four lagoons, contaminating the soils and groundwater with a variety of metals, cyanide, and chlorinated organic solvents, including trichloroethylene and tetrachloroethylene. In 1980, NHPC notified EPA that it was a hazardous waste disposal facility in accordance with the Resource and Conservation Recovery Act (RCRA) Section 3001 regulations and continued to operate under an interim permit. As the result of inspections conducted by EPA and the New Hampshire Department of Environmental Services (NHDES) between 1982 and 1985, NHPC received several Notices of Violation/Orders of Abatement for failure to comply with RCRA transportation, storage, and disposal requirements, and for inadequate treatment of its cyanide wastewater prior to discharge. Operations at NHPC ceased in November 1985, and NHPC was dissolved in 1991.

NHDES and EPA implemented initial response actions at the Site from 1987 through 1994. NHDES' cleanup activities that took place in 1987 included: treatment of the lagoon system with lime and a sodium hypochlorite solution; removal of debris, drums, and plating tank liquids; and a superficial cleaning of the NHPC building. From 1990 to 1991, EPA removed, solidified, and consolidated sludges and soils from the four lagoons. To further secure and restrict access to the Site, a perimeter fence was built. In 1994, the NHPC building was decontaminated, demolished, and removed from the Site. An underground storage tank was also removed. Sampling under the former building was performed and a temporary cap was installed to prevent the possible spread of contaminated soils.

EPA placed the Site on the National Priorities List ("NPL") in October 1992. From 1992 through 1996, EPA performed a Remedial Investigation and Feasibility Study (RI/FS) for the Site. In September 1998, EPA finalized its cleanup plan in a Record of Decision (ROD). Remedial construction activities began in December 2004 and were substantially completed in September 2006.

B. CONTAMINATION PROBLEMS AND SITE RISKS

Soils

Cadmium was the primary contaminant of concern in on-site soils. Cadmium was the most toxic and frequently detected soil contaminant. The maximum concentration of cadmium detected in soils was 1,277 mg/kg. A baseline human health risk assessment (HHRA) conducted as part of the RI/FS found that the presence of elevated levels of cadmium in on-site soils exceeded EPA's non-carcinogenic hazard index under industrial, trespasser, and residential land-use scenarios.

A baseline ecological risk assessment (BERA) conducted as part of the RI/FS concluded that elevated levels of cadmium in on-Site soils posed a risk to local species such as the short-tailed shrew.

Groundwater

For groundwater, several volatile organic compounds (VOCs) and metals have been present at levels above federal maximum contaminant levels (MCLs). These contaminants include 1,1-dichloroethylene, trichloroethylene, tetrachloroethylene, vinyl chloride, arsenic, cadmium, chromium, and nickel. Currently, the Site and surrounding properties are served by a public water supply. However, the HHRA conducted as part of the RI/FS found that, under a potential future use scenario, if groundwater were to be used for drinking water, the carcinogenic and non-carcinogenic risk exceeded acceptable levels.

C. SUMMARY OF SELECTED REMEDY

The ROD for the New Hampshire Plating Company Superfund Site was signed on September 28, 1998. The remedial action objectives (RAOs) listed in the 1998 ROD were:

- minimize contaminants leaching from soils that would result in groundwater contamination exceeding MCLs, State ambient groundwater quality standards (AGQS); or acceptable human-health based levels;
- prevent contact by ecological receptors with soils having contaminant concentrations exceeding the ecological risk-based performance remedial goals;
- prevent ingestion of groundwater containing contaminants at concentrations exceeding drinking water criteria;
- minimize off-site migration of contaminants in the groundwater; and
- minimize discharge of contaminated groundwater to the Merrimack River.

The September 1998 ROD selected a remedial action that will prevent or minimize the continued release of hazardous substances to the groundwater and provide for the management of migration of groundwater. In summary, the selected remedy consisted of the following major components:

- Treating approximately 40,000 cubic yards of metal-contaminated soils by in-place chemical fixation;
- Consolidating and backfilling all treated soils in former lagoons 1 and 2;
- Crushing, testing and treating the storage-cell material, as necessary, on-site using the chemical fixation process and placing treated material in former lagoons 1 and 2 area;
- Placing two feet of clean soils over the treated materials in the lagoons 1 and 2 area;
- Re-grading and vegetating the Site using appropriate wetlands-type plants and grasses, and assuring adequate flood-storage capacity;

- Performing restoration of contaminated groundwater in the shallow and deep overburden aquifers by natural attenuation;
- Establishing an groundwater monitoring network for annual groundwater monitoring;
- Installing two well clusters in the Town of Litchfield for long-term monitoring;
- Annually sampling surface water from the Merrimack River and Horseshoe Pond;
- Establishing institutional controls to implement both land and groundwater use restrictions, including a Groundwater Management Zone (GMZ) pursuant to the New Hampshire Code of Administrative Rule Env-Ws 410.26; and
- Mitigating unavoidable impacts to on-site wetlands through the preservation of the Grassy Pond area in Litchfield and an additional wetland area to be determined in the Town of Merrimack.

All the above components of the remedial action are either complete or underway.

III. BASIS FOR THE DOCUMENT

A. Basis of Change to the Soil Treatment Method

The 1998 ROD called for in-place treatment of metal-contaminated soils via chemical fixation in 12-foot lifts. Treatment by chemical fixation involves converting soluble inorganic contaminant compounds into an insoluble form by blending and adding liquid and/or solid reagents to initiate a chemical substitution reaction. The treated soils are chemically stable, has low solubility, and does not crush or degrade from physical force. In addition, the treated material appears similar in form to the untreated material. Chemical fixation has been used effectively at over 200 sites across the country to treat metal-contaminated soils.

In 2000, Sevenson Environmental Services, Inc. conducted a bench scale test to verify the chemical fixation process using soils from the Site. The study confirmed that chemical fixation would be effective in treating the on-site metal-contaminated soils. However, the study also found that in-place treatment as conceptualized in the ROD was not viable for the Site because of the heterogeneous nature of the soils, the presence of multiple metal contaminants of concern, and the need to ensure adequate mixing of soil and the chemical fixation reagents. As a result, in order to retain the 1998 ROD's key feature of on-site treatment of contaminated soils by chemical fixation, ex-situ soil treatment was identified as the most appropriate method to ensure proper application and mixing of the reagents with the contaminated soils.

During the remedial action, contaminated soils were excavated and transported to a designated chemical fixation treatment area located on-site. The contaminated soils were treated by blending and mixing with 5-to-6 percent by weight of reagents. The mixing of contaminated soils with reagents was performed by either a pugmill system or the use of

excavators. Each batch of treated soils was tested and stockpiled until confirmation analyses verified that the treated soils did not leach contaminants in excess of the cleanup levels outlined in the 1998 ROD. Treated soils that met the 1998 ROD cleanup levels were then backfilled on the property. The modified treatment method was found to be highly effective and all treated soils passed confirmation testing.

B. Change to the Treated Soil Backfill Location

The 1998 ROD called for treated soils to be backfilled in former lagoons 1 and 2. During the performance of the remedial action, over 60,000 cubic yards of contaminated soils were excavated and treated, significantly exceeding the estimate in the ROD of 40,000 cubic yards.

Back-to-back record annual rainfall levels were recorded for southern New Hampshire in 2004 and 2005 causing the water table elevations at the Site to be significantly higher than at the time of the 1998 ROD and remedial design. Due to the high groundwater table at the time of the remedial action, the excavation plan was revised to raise the excavation elevation in the central western portion of the Site. As a result, less backfill volume for treated soils was available in the western portion of the Site. At the same time, the need to maintain flood storage capacity, as required by the 1998 ROD, necessitated identifying other on-site areas appropriate for treated soil backfill.

Because of the extra soils requiring backfilling and the reduced capacity for the backfill of treated soils, backfilling treated soils only in former lagoons 1 and 2 was determined to be insufficient. As a result, treated soils were also backfilled in the former southern wetland area, the former building area, and within a mounded area that was constructed on the eastern side of the Site. The mounded area was designed and constructed to have water on the surface run north-south so as not to interfere with potential flow across the Site in the event of a flood. The above-described change to the treated soil backfill location maintains the Site's overall flood storage capacity while still maximizing the amount of flat level areas for future potential reuse options.

C. Change in Soil Cleanup Level for Cadmium in the Northern Wetland Area

The 1998 ROD set soil cleanup levels for five separate source areas on the Site. The cleanup levels for cadmium ranged from 1.78 to 6.42 mg/kg and were established to protect the aquifer from soil leachate. At these levels, the concentrations left in residual untreated soils would not be expected to impair future groundwater quality, and the timeframe for natural attenuation of groundwater contaminant levels to safe drinking water levels was estimated at 26 to 58 years. The soil cleanup level for cadmium necessary for the protection of ecological receptors was determined to be 5.6 mg/kg, and the soil cleanup level for cadmium necessary to be protective of human health was determined to be 108 and 140 mg/kg for residential and industrial reuse scenarios, respectively.

A soil cleanup level for cadmium of 1.78 mg/kg was established in the 1998 ROD for the northern wetland area. During the performance of the remedial action, contaminated

soils in the northern wetland area were excavated to their greatest possible extent without causing significant structural damage to paved areas, utility lines, and other engineered features at the Site and on adjacent properties. However, at this point in the remedial action, it was determined that the 1998 ROD's soil cleanup level for cadmium had not been attained throughout the northern wetland area. Yet, to excavate further would have required extensive engineering and construction resources, incurred significant costs (estimated at $434,400), and resulted in a long delay in project completion. Statistical analysis of confirmation testing results found that the average cadmium concentration in residual soils in the northern wetland area was 3.92 mg/kg. It was estimated that an additional 4,000 cubic yards of soils would have needed excavation to achieve a soil cleanup level for cadmium of 1.78 mg/kg.

At a level of 3.92 mg/kg, the concentration of cadmium in the northern wetland area soils nonetheless is well below the levels necessary for the protection of human health (108 mg/kg), protection of ecological receptors (5.6 mg/kg), and remains within the EPA human health acceptable carcinogenic risk range of 10^{-4} to 10^{-6} and a target organ hazard index of 1 for carcinogenic and non-carcinogenic risks, respectively. In addition, at a soil cleanup level for cadmium of 3.92 mg/kg, groundwater modeling calculations indicate that the total natural attenuation timeframe remains the same, at 26 to 58 years. Applying the original cleanup level for cadmium of 1.78 mg/kg versus the revised cleanup level of 3.92 mg/kg for the approximately 4,000 cubic yards of northern wetland soils results in an estimated maximum reduction of only 0.5 micrograms per liter (μg/L) of cadmium in contaminated groundwater emanating from the Site at the edge of the Merrimack River where Site groundwater discharges. The estimated difference of 0.5 μg/L in cadmium levels in groundwater using the two different soil cleanup levels for cadmium is within the accuracy range of the groundwater cleanup model.

An evaluation of the above factors led EPA to conclude that, to the greatest extent practicable, best efforts had been made to achieve the soil clean-up level for cadmium in the northern wetland area and that it is appropriate to change this cleanup level from 1.78 mg/kg to 3.92 mg/kg.

It should also be noted that areas downgradient of the Site are served by public water supply and that no change has been made to the 1998 ROD's institutional control requirements that will restrict the consumption of groundwater for drinking water purposes until contaminant levels in groundwater have attenuated to safe drinking water levels.

IV. DESCRIPTION OF SIGNIFICANT DIFFERENCES

The proposed modifications to the remedy are summarized below.

A. Original Remedy

The original remedy is described in Section II.C. of this document. The 1998 ROD included the following remedial components:

- Treatment of approximately 40,000 cubic yards of metal-contaminated soils by in-place chemical fixation; and

- Consolidation and backfilling of all treated soils in former lagoons 1 and 2.

In addition, the 1998 ROD identified 1.78 mg/kg as the soil cleanup level for cadmium for the northern wetland area.

B. Modified Remedy

The modified remedy calls for the following substituted remedial components:

- Treatment of approximately 60,000 cubic yards of metal-contaminated soils by ex-situ chemical fixation;

- Consolidation and backfilling of all treated soils in former lagoons 1 and 2, the former southern wetland area, and the former building area.

The soil cleanup level for cadmium for the northern wetland area is 3.92 mg/kg.

C. Summary of Costs

The implementation of the modified remedy does not have a significant impact on the costs associated with the Site.

V. SUPPORT AGENCY COMMENTS

The State of New Hampshire has participated with EPA in reviewing the modifications to the remedy described herein.

VI. STATUTORY DETERMINATIONS

EPA has determined that the modified remedy remains protective of human health and the environment, complies with all Federal and State requirements that are applicable or relevant and appropriate to this remedial action, meets the remedial action objectives specified in the 1998 ROD, and is cost-effective.

VII. PUBLIC PARTICIPATION COMPLIANCE

In accordance with Section 117(d) of CERCLA and Section 300.825(a) of the NCP, this ESD and supporting documentation shall become part of the Administrative Record for the Site. This ESD and the Administrative Record are available for public review at the locations and times listed in Section I.E. above. A public notice, which summarizes the modification to the remedy as set forth in this ESD shall be published in a local newspaper of general circulation following the signing of this ESD.