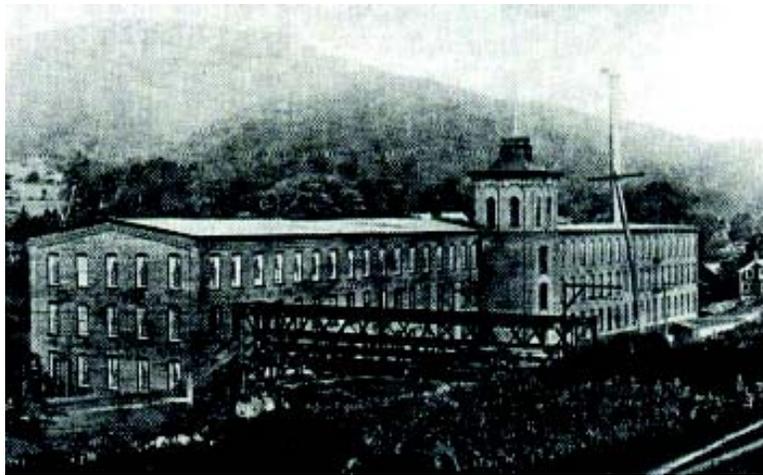




Preliminary Reuse Assessment

Pownal Tannery Superfund Site



Office of Site Remediation and Restoration
September 2002

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PURPOSE OF THIS DOCUMENT

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 those 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 is fundamental to achieving both of these objectives.

To establish cleanup standards and design a protective remedy, it is necessary to first determine how the site and immediate surroundings will be used. That information is then used to make reasonable assumptions about potential exposures to contaminants. For this reason, the types of site use, as well as the level of certainty regarding those uses, can have a dramatic impact on the final remedy and associated project costs.

This Preliminary Reuse Assessment summarizes information about current and future land uses at the subject site that was readily available to the EPA case team. It is intended to be the basis for working with local communities, property owners and other stakeholders to develop a more complete and realistic understanding of site use. This collective information will help support EPA's decisions regarding appropriate response actions at the site, including the consideration of site use/reuse in the design and implementation of the site cleanup. For information on site reuse to be effectively considered, however, it must be available early in the remedial process and be known with sufficient detail and certainty. Where uncertainty regarding potential reuse options exists, EPA hopes to encourage and assist, as practical, local efforts to resolve those uncertainties.

The Preliminary Reuse Assessment is presented in three sections:

- **Section 1 - Site Background:** Describes the physical, environmental, and historical context of the site, particularly as it applies to current and potential future uses;
- **Section 2 - Reuse Status:** Summarizes the current uses and identifies some potential reuse issues and considerations associated with individual areas of the site; and
- **Section 3 - Site-Specific Planning & Implementation Support:** Identifies some specific actions EPA plans to take to work with stakeholders and other parties to resolve remaining questions about future site use.

SECTION 1 - SITE BACKGROUND

General Description

The Pownal Tannery Superfund site is located between Route 347 and the Hoosic River in the village of North Pownal, in Bennington County, Vermont (see figure 1). The site was a former hide tanning and finishing facility owned by the Pownal Tanning Company, Inc. The site has been inactive since 1988, when the company declared bankruptcy. The site consists of three contamination sources: the tannery building complex, a lagoon system, and the tannery's sludge landfill. In total, the Pownal Tannery site encompasses approximately 28 acres.

The area surrounding the site is a rural and residential community with approximately 3,500 residents. The nearest residences are approximately 200 feet from the site and rely upon groundwater from private wells for their water supply.

QUICK FACTS

Location: State Route 346
Pownal, Vermont
(Bennington County)
42° 47' 49.8" north latitude
73°15' 56.7" west longitude
(See Figures 1 & 2)

ID Number: VTD069910354

Site Area: 26 acres

Number of Parcels: 5

Current Uses: Abandoned industrial area, former tannery, warehouse, and lagoons

Ownership: Multiple. Private and public

Cleanup Status: Study Underway

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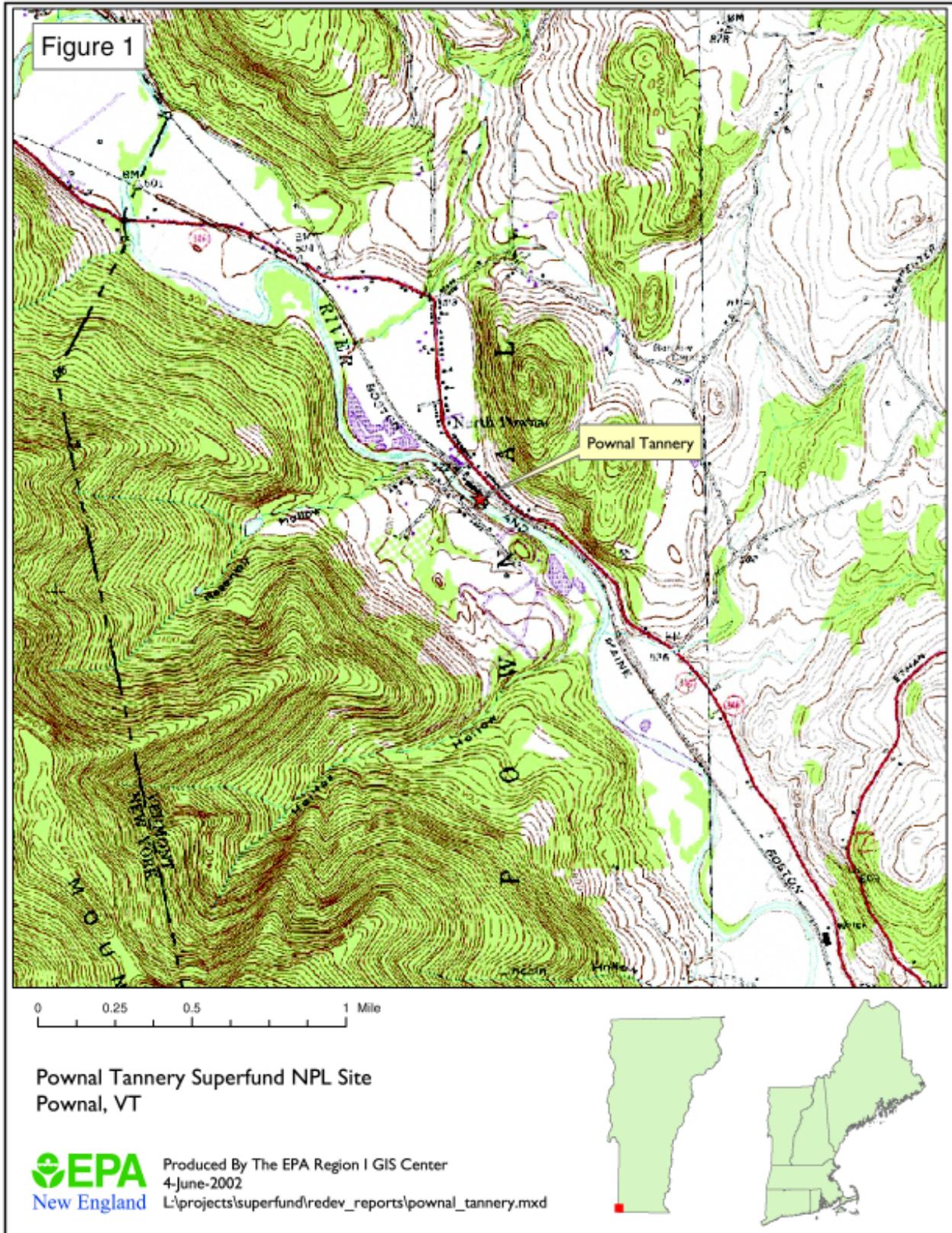
The former tannery was built in 1866 as the "North Pownal Manufacturing Company", and was owned by A.C. Houghton and Co. The site was originally used to make cotton print cloth. The mill manufactured an estimated five million yards of cotton goods per year. In 1935, the cotton mill was converted to a tannery. The operation consists of hide cleaning (beaming) using a variety of chemicals (pesticides, solvents), hydrochemical stabilization of the purified leather (tanning) using trivalent chromium, dyeing and lubrication of the tanned leather, followed by pasting and finishing of the leather into a variety of textures and thicknesses for commercial sale.

The tannery building portion of the site comprises approximately 3 acres and has an upper level which borders the Boston & Main Railroad/Guildford Transportation right-of-way, and a lower level that borders the Hoosic River. The former tannery building was demolished as part of EPA's cleanup actions in 2001 (see "Environmental History/Status" section below for more information), but the massive concrete foundation walls of the former tannery remain in place. The property includes an old dam and associated penstock structure and a hydrostation located at the southern end. The Hoosic River represents a Class B Water as defined by the Vermont Water Resources Board. Class B waters have an objective of providing water quality that consistently exhibits good aesthetic value and to provide high quality habitat for aquatic biota, fish and wildlife. Uses of Class B waters include public water supply (with filtration and disinfection); irrigation and other agricultural uses;

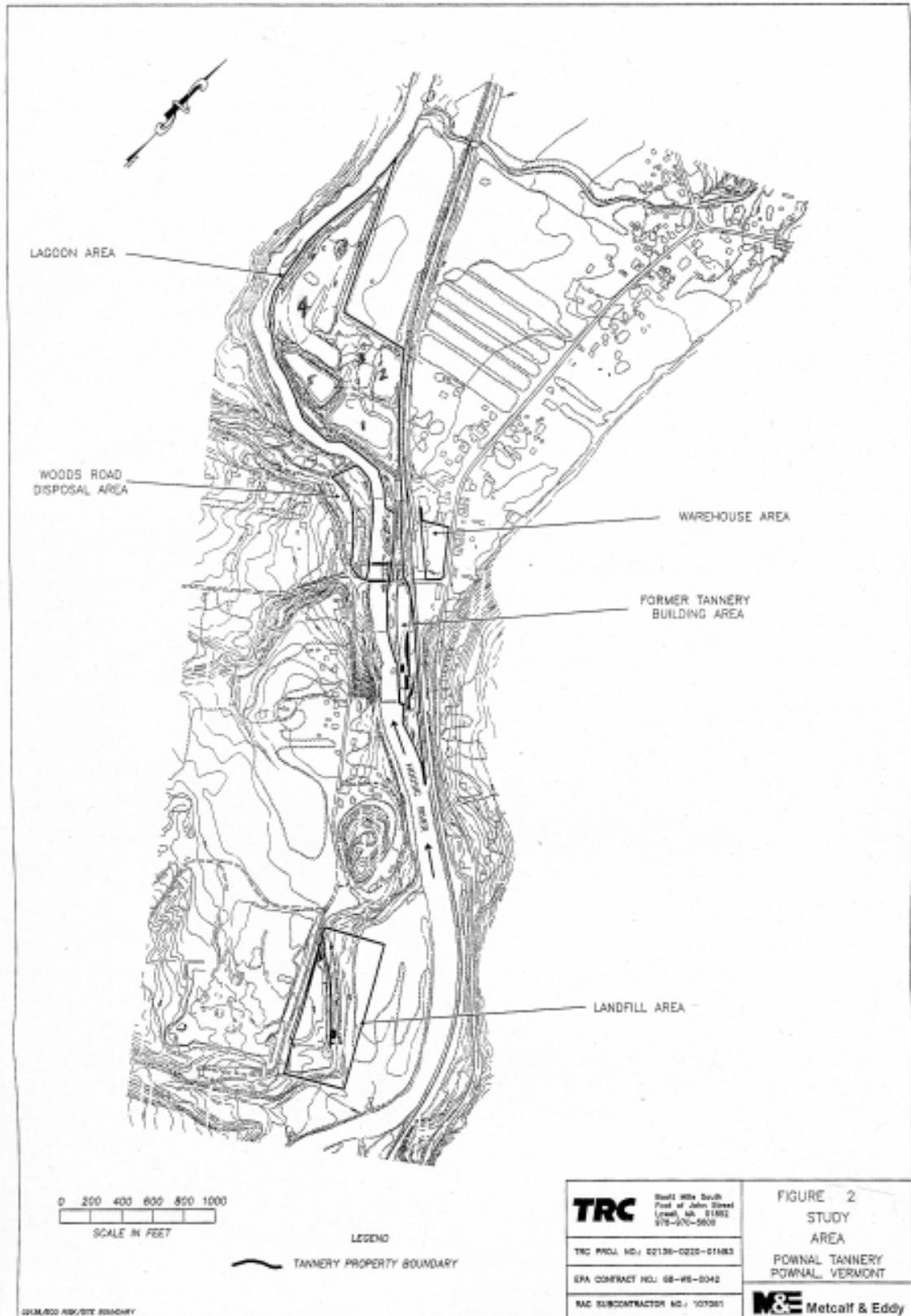
swimming and recreation. The Hoosic River is also classified as a Cold Water Fish Habitat (i.e., suitable for coldwater fish such as trout). This portion of the site is currently zoned "Rural/Residential" by the town of Pownal.

Also on the site is a parcel (approximately 22 acres), bordered by the Hoosic River to the west and by the railroad right-of-way to the east, containing five abandoned and partially filled earthen treatment lagoons (see figure 2). In addition to the manmade earthen lagoons, there is a concrete foundation located in the area of Lagoon #3 where a clarifier building once stood (built in 1978). There is an abandoned effluent weir structure in Lagoon #5 connected to the Hoosic River. Old utility poles are still standing , but the

► Fig. 1



►Fig. 2



cables have been removed and the poles are in disrepair. This portion of the site is currently zoned "Rural/Residential" by the town of Pownal.

The 1.2 acre warehouse portion of the site is located between Route 346 and the railroad, across from a general store. This 20,000 square foot steel-framed warehouse building is located adjacent to the railroad track. This building was used to store miscellaneous items during the years of tannery operation. The most recent tenant used the building to store wood pellets. The interior of the building was cleared of all materials and steam cleaned and is currently vacant. The warehouse portion of the site is currently zoned "Village/Residential" by the town of Pownal.

The remaining portion of the site includes the former tannery landfill, located across from the Hoosic River and southeast of the tannery building complex. The landfill was covered with a permanent cap as part of EPA's cleanup actions in 2001. A hydroelectric dam was built on the Hoosic River in 1955 at the tannery building for power generation. The dam is still in place, but is no longer used for hydropower.

Environmental History/Status

► Past Site Operations:

From approximately 1937 until 1962, untreated tanning process wastewater was directly discharged into the Hoosic River. A lagoon system comprising six lagoons, was constructed in several stages between 1962 and 1971 to receive the tannery's wastewater. In 1982, a state permitted lined landfill was constructed on site which received sludge dredged from a portion of the lagoons. The tannery landfill is situated on a parcel of land across from the Hoosic River and southwest of the tannery building complex. In 1987, two-thirds of the landfill was covered and closed. The remaining portion remained uncovered. While some site-related contaminants had been detected in residential wells in the past, current sampling data indicates that safe drinking water standards are not being exceeded.

The tanning of hides required use of a variety of chemicals to remove animal tissues and fats, and to prepare the hides for tanning, coloring, and finishing. Chemicals used included lime, acids, ammonium salts, sulfuric acid, mineral tannin (trivalent chromium), dyes, pigments, solvents, acrylics, butadiene, polyurethanes, resins, waxes, and lacquers. In addition, pentachlorophenol was used as a biocide to treat the hides.

From approximately 1937 until 1962, untreated tanning wastewater was discharged directly to the Hoosic River. Various attempts at wastewater treatment were employed from 1962 through 1988 - including the use of the series of lagoons currently on the site.



Pownal Tannery, circa 1780

Description of Operable Units: Often, Superfund sites are partitioned into distinct study areas called "operable units". The boundaries of these operable units are generally based on environmental considerations (e.g., a major source area, a groundwater plume, etc.) and do not necessarily reflect property boundaries. The Pownal site has not been divided into separate units, and currently consists of one operable unit, representing the entire site.

Site Contamination/Risk Assessment: EPA has completed a number of studies and cleanup actions at the Pownal Tannery site. In November 1998, EPA completed an Engineering Evaluation/Cost Analysis (EE/CA) to assess various options for controlling and containing the source of contamination at the Site. In March 1999, an Action Memorandum for a Non-Time-Critical Removal Action (NTCRA) was signed, providing

for decontamination and partial demolition of the former tannery buildings, excavation of soils and sludges above specified cleanup levels within the tannery building footprint, and construction of a RCRA Subtitle C cover at the on-site landfill. This work was completed in 2001. In June 2001, a draft Remedial Investigation (RI) was completed by EPA, and a draft Feasibility Study (FS) evaluating options for cleanup of the lagoon area was completed in early 2002. A brief summary of the findings of the RI is outlined below. For more detailed information on contamination detected at the site and associated risks, see the Remedial Investigation report (Metcalf & Eddy, 2001).

Risks from contamination were assessed based on residential and recreational exposure scenarios. These exposure scenarios are consistent with the town's proposed reuse of the property as a park and recreational area.

Lagoon Area

The Lagoon Area consists of four open depressions that represent remnants of the five original tannery lagoons. The RI documented the presence of sludge in Lagoons 1, 3 and 5, as well as in a limited area of Lagoon 4. The thickness of this material varied from location to location, with the thickest deposits being 4 to 9 feet in Lagoon 1, and up to 11 feet in Lagoon 3. Deposits of sludge in Lagoon 5 were less than 4 feet in thickness. The majority of sludge appeared to have been removed from Lagoon 2. Except for the southern end of Lagoon 4 (adjacent to Lagoon 3), there was no sludge in Lagoon 4.

In the five lagoons, potential exposures to soil/sludge, surface water and air were evaluated. Health risks from air and surface water are expected to be below or within the EPA risk range of 10^{-6} to 10^{-4} for cancer risk and below a hazard index of 1 for non-cancer risk. Health risks from potential future ingestion and dermal contact with soil/sludge at Lagoons 1, 3 and 5 exceed EPA risk guidelines. If not cleaned up, future childhood exposures to lead in soil could result in excess blood lead levels in park visitors at Lagoon 1.

Landfill Area

The landfill was constructed onsite to dispose of dewatered pressed sludge from the lagoons. The landfill occupies approximately 54,100 square feet and consists of four cells, three of which are filled and were capped by EPA in 2001. The landfill is approximately 400 feet long and varies from 80 to 200 feet wide. The landfill was constructed so that the liner beneath the sludge landfill was at least 10 feet above the water table. The landfill liner consists of a 36-mil Hypalon liner overlain by 12 inches of sand. Above this layer, 4-inch diameter perforated PVC leachate collection pipes were placed within an 18-inch layer of crushed stone, and covered with 6 inches of gravel. Sludge was placed above the liner in a layer that is between 6 and 13 feet thick. There is a leachate collection system which was upgraded by EPA at the same time that the landfill was capped. It is believed that the leachate system beneath the landfill previously leaked since leachate was observed discharging to the surface in seeps downhill of the landfill. Surface water runoff from the landfill combines with ground water seeps at the base of the slope below the landfill and flows through wetlands located adjacent to the Hoosic River. No further remedial work is believed to be needed to address contaminant sources at the landfill. However, EPA is currently addressing any potential ground water contamination issues, or concerns of possible impacts from landfill seeps or ground water discharge to the wetlands, streams and the Hoosic River located downhill and downgradient from the site. There does not appear to be a VOC ground water plume in the landfill area, therefore, it is unlikely that the landfill (which is now capped) is an ongoing source of VOC contamination.

Former Tannery Building Area

The former tannery building occupied approximately 170,000 square feet. The original northern and central portion of the building was primarily of brick construction with a partially earthen floor. The building was four stories tall including the basement. Prior to the beginning of the Remedial Investigation, the Tannery Building was decontaminated and demolished by the United States Army Corps of Engineers (USACE) for EPA as part of the NTCRA. In addition, a large volume of soil was excavated from inside the building footprint, all known underground piping was removed, and several underground manways were filled and closed. Portions of the original building foundations remain underground in some places, and the entire site was regraded and finished with grass, crushed rock and stone. As a result of the USACE actions taken on this portion of the site, all potential contaminant source areas were addressed.



Pownal Tannery building prior to demolition

Warehouse Area

This area includes an active warehouse building that was formerly used for storing hides. As part of the NTCRA EPA closed and decontaminated several manholes, pits and drains in the warehouse that were filled with soil, sludge, and wood chips at this area. EPA also removed a small number of overpacked drums and an accumulation of potentially asbestos containing materials. In this area, potential exposures to soil were evaluated. Health risks from surface soil are expected to be below or within the EPA risk range of 10^{-6} to 10^{-4} for cancer risk and below a hazard index of 1 for noncancer risk. EPA has determined that no further cleanup of the warehouse by the Superfund program is warranted.

Hoosic River

The Hoosic River runs adjacent to the Tannery Area, the Woods Road Disposal Area, the Lagoon Area, and all ground water from the site discharges to the river. Surface runoff from the site can also enter the Hoosic River. A reported breach in the berm at Lagoon 4 occurred once during a flood and was repaired by the state. In addition, there are outfalls into the river at the Tannery Area and Lagoon 5, and there is one sewage outfall across the river from the Woods Road Waste Disposal Area. Surface runoff from the Landfill is directed to a small stream or to a wetland and pond located between the landfill and the Hoosic River. During most of the year the pond is separated from the river by a narrow strip of land.



Hoosic River; former tannery building area is at left of photo

In this area, potential exposures to surface water and sediment were evaluated. Health risks from surface water are expected to be below or within the EPA risk range of 10^{-6} to 10^{-4} for cancer risk and below a hazard index of 1 for non-cancer risk. Health risks from future ingestion and dermal contact with sediment exceed EPA risk guidelines. Sediment contaminants contributing to risks above EPA risk guidelines, under central tendency and Reasonable Maximum Exposure (RME) scenarios were PCBs, dioxins and arsenic.

Off-Site Private Groundwater Wells

Current exposures via groundwater ingestion from off-site private wells were evaluated. Health risks from current ingestion of ground water exceed EPA risk guidelines for four of the ten private wells evaluated. Ground water constituents contributing to risks above EPA risk guidelines, under an RME scenario were arsenic, thallium, and manganese. Potential future exposures via ground water ingestion from wells on-site were also evaluated. Health risks from future ingestion of ground water exceed EPA risk guidelines for 13 of the 24 monitoring wells evaluated.

►Cleanup Actions to Date:

In 1993, EPA initiated a Time Critical Removal Action. This removal action consisted of removal of hazardous substances from the site including compressed gas cylinders, asbestos-containing materials, tank contents, three 1-gallon cans of tetrahydrofuran, suspected dioxin-containing wastes, and one drum containing pentachlorophenol. In addition, all tanks were cleaned and wastes sent off-site, covers were welded onto five open topped in-ground tanks located in the lagoon area, sludge in floor drains and smoke stack debris were sampled, all buildings were sealed to prevent public access and potential exposure, waste piles were sampled and all hazardous contents were disposed off-site and a breach in Lagoon 4 was repaired.

As noted above, a NTCRA cleanup, consisting of decontamination and partial demolition of the former tannery buildings, excavation of soils and sludges above specified cleanup levels within the tannery building footprint, and construction of a RCRA Subtitle C cover at the on-site landfill, was completed in 2001.

►Planned Site Remedy:

EPA is has currently finalized a Feasibility Study outlining options for cleanup of the Lagoon Area. A proposed plan for cleanup was provided for public comment in July 2002. Subsequent to the public comment period, EPA will produce a Record of Decision for the cleanup of the lagoons and other portions of the site, as necessary. A remedy to excavate, consolidate and cap the contaminated lagoon sludge is anticipated. This effort is anticipated to begin in spring 2003 and be completed in 2004.

CHRONOLOGY OF KEY EVENTS

- 1780:** A grist mill is constructed by Richard Brown at the site.
- 1813:** The grist mill is converted into a wool weaving and carding plant, and later a woolen mill and cotton textile mill.
- 1936:** The mill is refurbished by the Pownal Tanning Company and opens as a cow and sheep hide tanning operation.
- 1962:** A lagoon system and a screen house are constructed to precipitate solids out of the waste water prior to discharge to the Hoosic River. In 1971, three lagoons are added to system and, in 1978, clarifier building is constructed to clarify wastewater and dewater sludge.
- 1980:** Lagoons 1, 3, and a portion of Lagoon 4 are backfilled with settled sludge.
- 1983:** Lagoon 1 is covered with a 1 foot layer of silt.
- 1986:** Vermont DEC issues order for the Pownal Tannery to conduct a limited hydrogeological assessment.
- 1988:** The tannery closes and files for Chapter 11 bankruptcy.
- 1993:** EPA completes a Site Inspection Prioritization (SIP) at the site. Compressed gas cylinders, drums of chemical wastes, tanks and vessels of process wastes, friable asbestos, and sludges in the facility wastewater treatment system were found at the site. EPA initiates a Time Critical Removal Action at the site.
- 1997:** EPA commissions additional site investigations.
- 1998:** EPA completes Engineering Evaluation/Cost Analysis (EE/CA) to assess various options for controlling and containing the source of contamination at the site.
- 1999:** The site is formally added to the Superfund National Priorities List (NPL). EPA initiates a Non-Time Critical Removal Action (NTCRA) at the site, completed in 2001.
- 2002:** Remedial Investigation/Feasibility Study finalized by EPA; proposed plan and Record of Decision (ROD) for final cleanup scheduled to be released.

SECTION 2 - REUSE STATUS

For the purposes of this section, which outlines the status of site reuse and associated issues, the site has been divided into four areas: the former tannery building, the lagoon area, the warehouse area, and the landfill. Much of the information outlined below regarding potential future uses was taken from the reuse assessment completed in February 2001 by Forcier Aldrich and Associates (FA&A) on behalf of the town of Pownal (funded via an EPA Superfund Redevelopment Initiative cooperative agreement). Note, the FA&A report did not address reuse of the landfill.

►Area #1: Former Tannery Building

Location: adjacent to railroad right-of-way and Hoosic River

Current and Potential Future Uses: Following closure of the tannery in 1988, the site was fenced and abandoned. The reuse assessment (FA&A, 2001) identified recreational reuse as the preferred alternative at the former tannery building site. There was consistently strong public support for a recreation reuse demonstrated through the “community needs assessment” process conducted as part of FA&A’s study. The site is adjacent to a picturesque dam watercourse and lends itself to a picnic area and public space. Secondly, the site has excellent access to the river for construction of a canoe/kayak launch. Also, FA&A’s “market demand analysis” stated a strong preference for pro-tourism, recreational reuses for this site. FA&A recommended reuse of the area as a public park, including the following features:



Tannery building area after demolition, warehouse building is visible in the background of photo

- covered stage area
- picnic areas
- children’s playground
- canoe/kayak launch area
- public restroom facility
- paved access road with parking
- water, sewer, and electric utilities

A potential site layout plan for this proposed reuse is shown in figure 3.

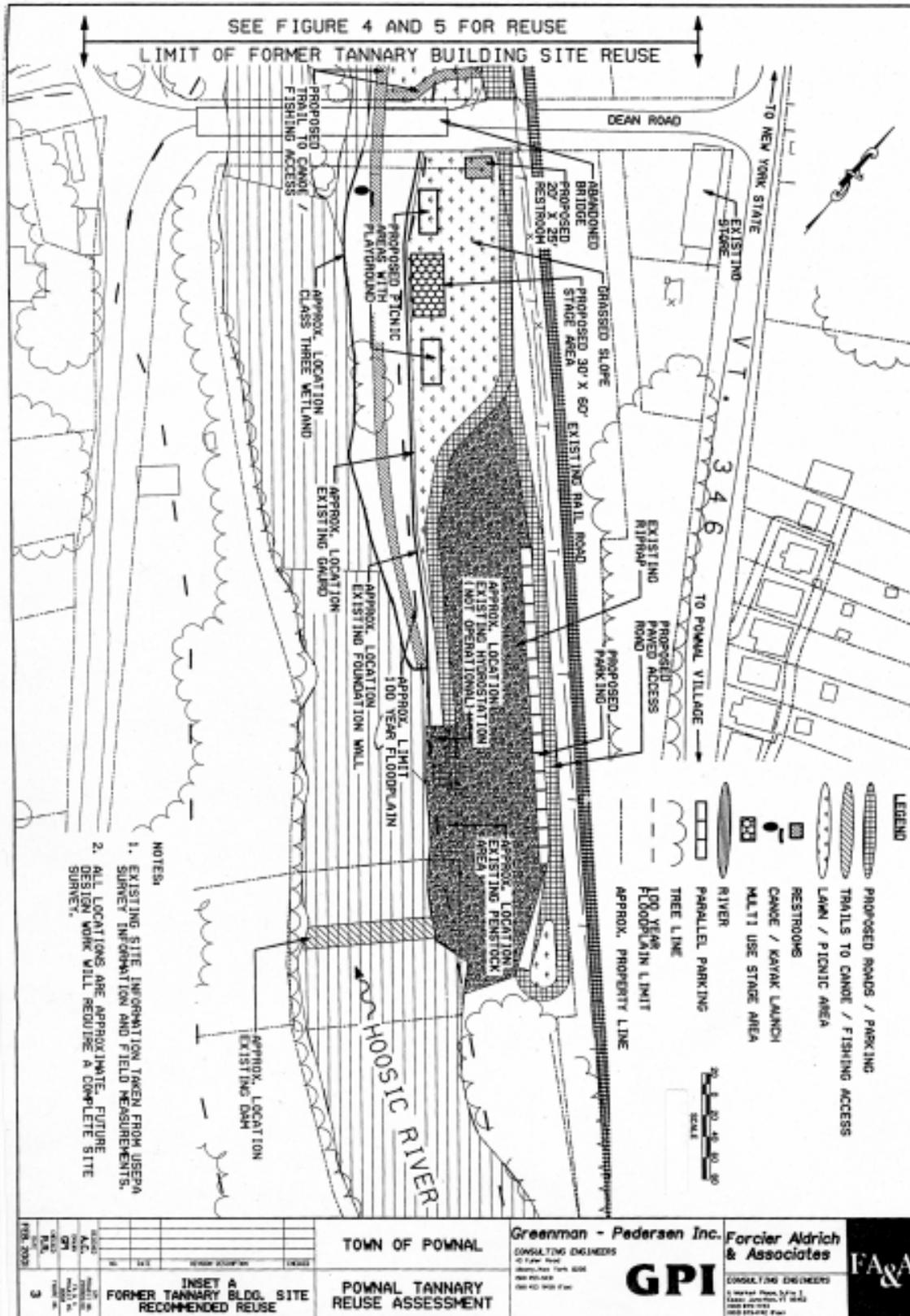
Potential Use/Reuse Issues and Considerations: The hydrostation and dam on the tannery property are owned by Jan Exman/Pownal Development Corporation. The remainder of the former tannery building site is owned by Flynn, the former tannery owner, with a mortgage held, but not foreclosed upon, by Exman. The town is in the process of trying to foreclose upon all of the affected former tannery parcels in Pownal. The town has yet to take title to the property, but is planning to do so by 2003.

The anticipated remedy would include institutional controls to prevent excavation of capped sludge materials and to prevent the consumption of groundwater at the lagoons.

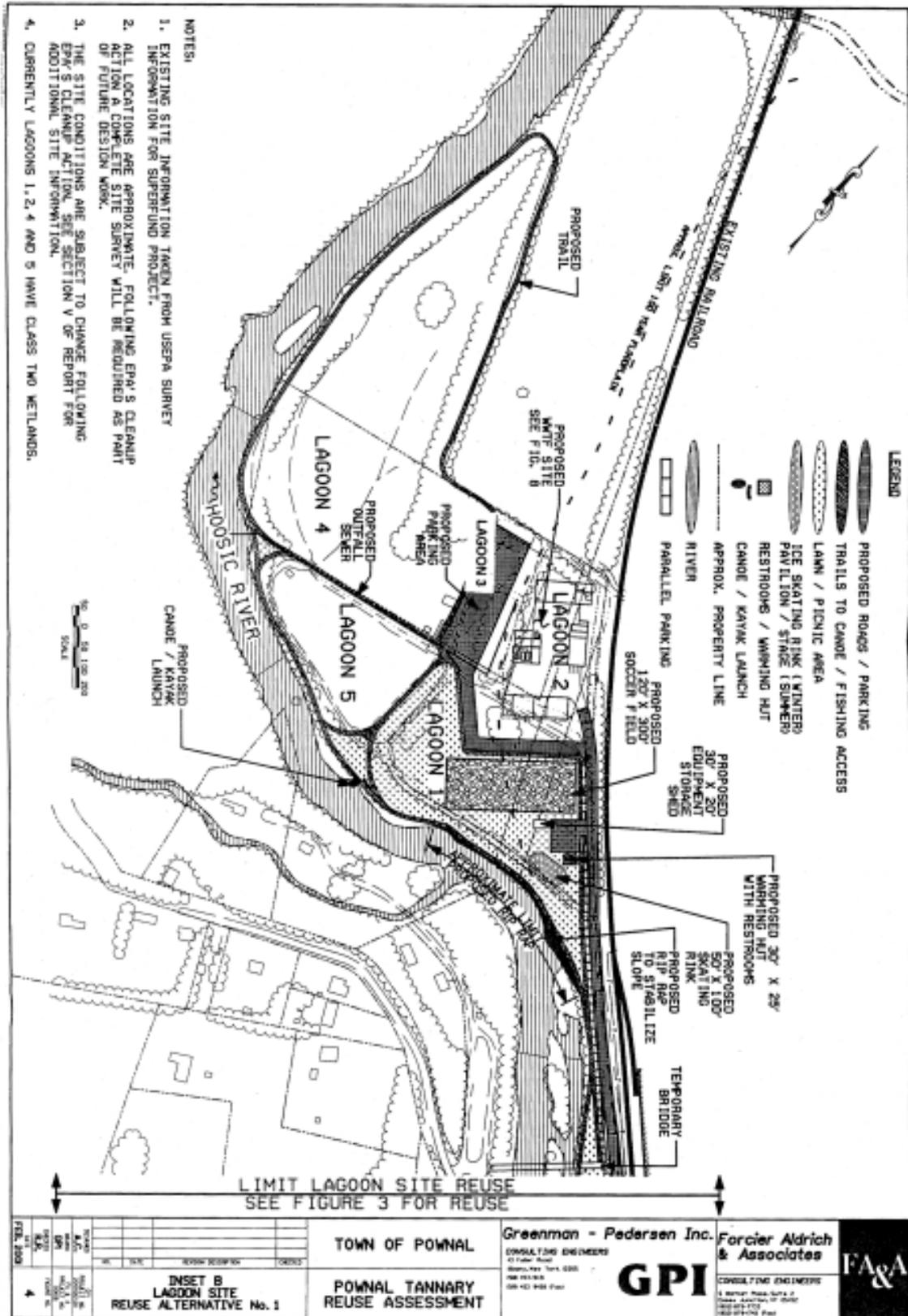
►Area #2: Lagoon Area

Location: bordered by the Hoosic River to the west and by the railroad right-of-way to the east

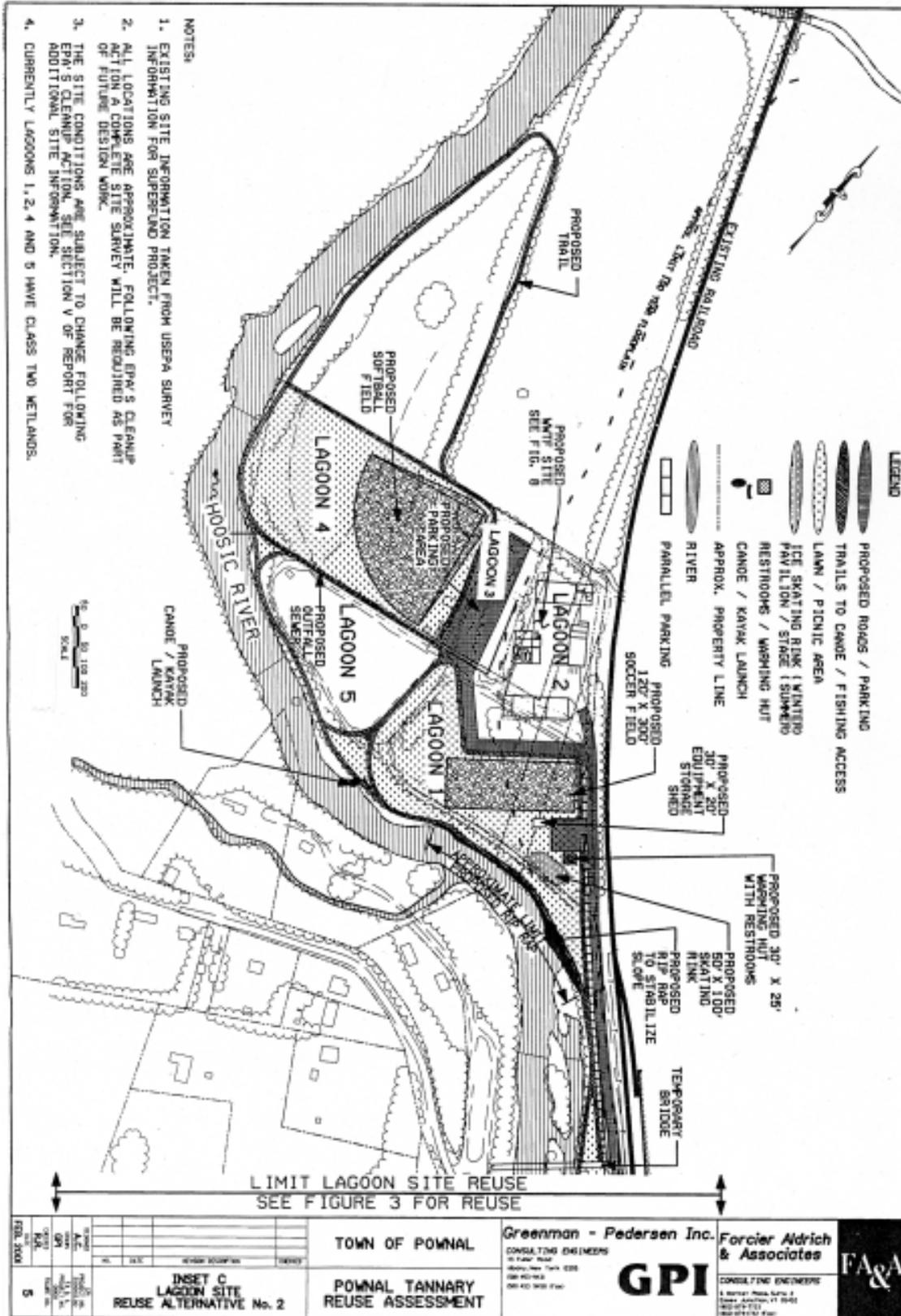
► Fig. 3



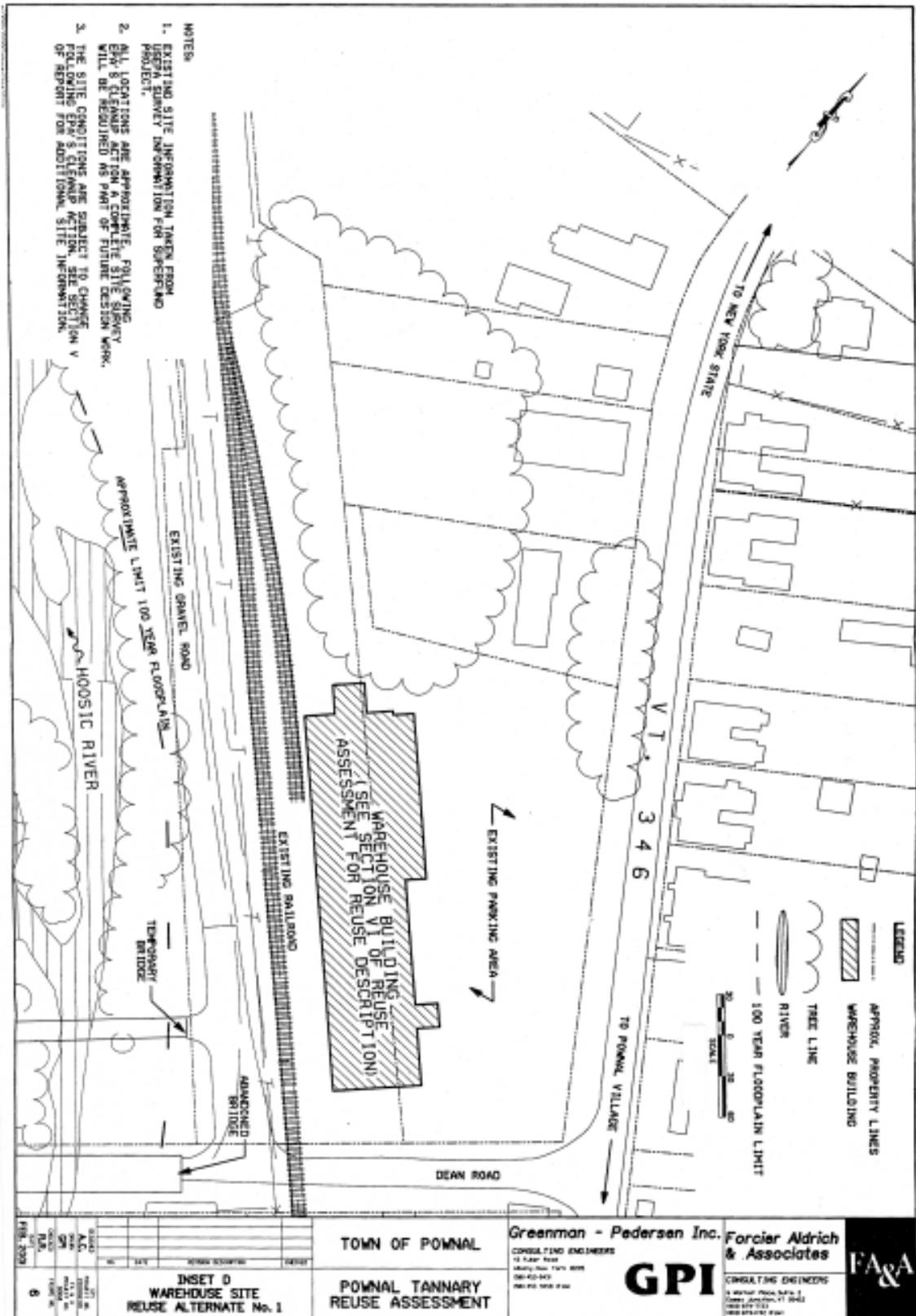
► Fig. 4



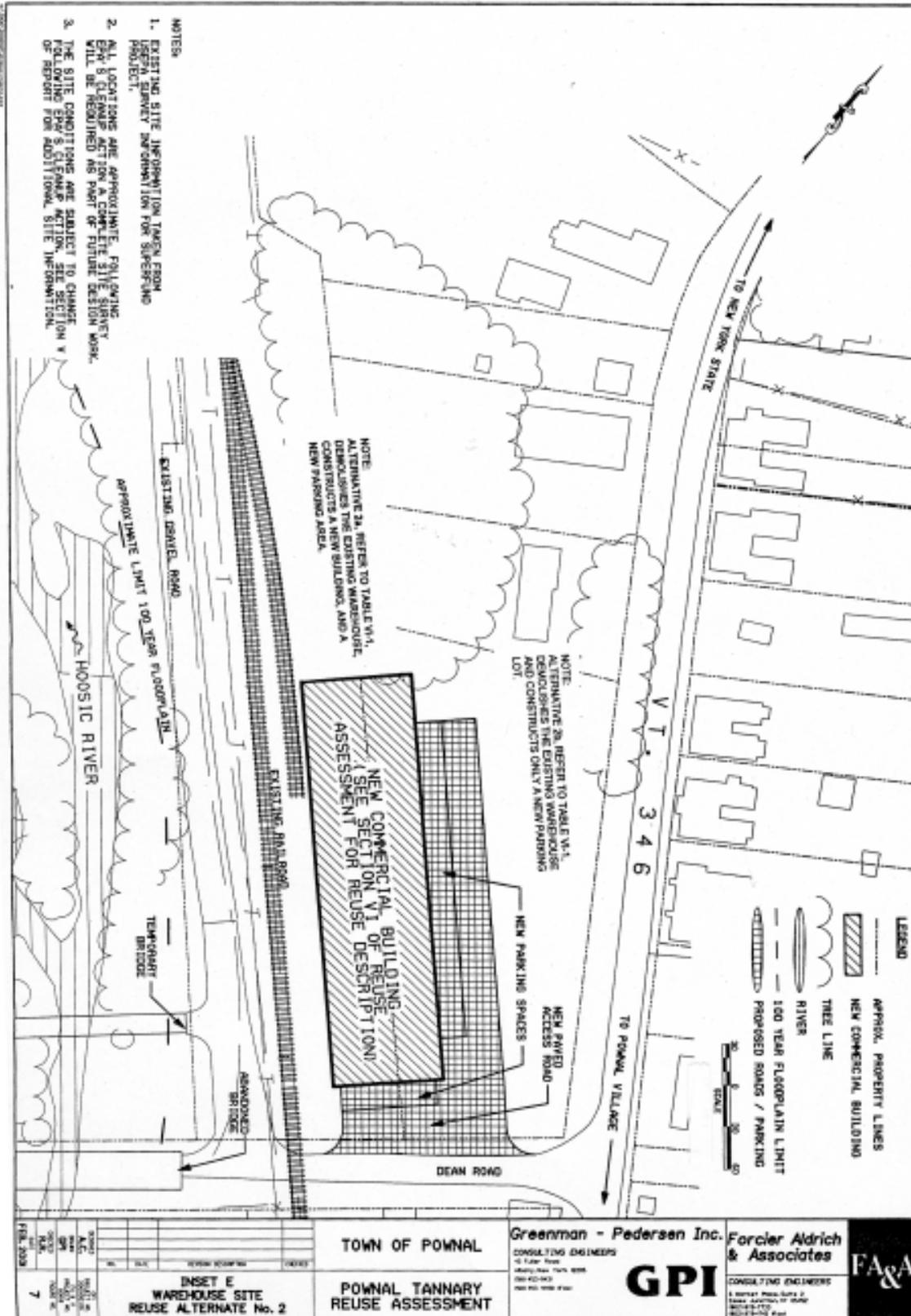
► Fig. 5



► Fig. 6



► Fig. 7



Current and Potential Future Uses: Since the tannery closed in 1988, the site has been abandoned. However, as reported by FA&A, the property is often used by 'four wheeler'/all-terrain vehicles and for fishing access. The town of Pownal has proposed the construction of a municipal wastewater treatment facility (WWTF) on the lagoon property - in the area of Lagoon #2 and portions of Lagoon #1. Funding is in place for the WWTF - including \$4.7 million in EPA grants for the project. The town hopes to complete construction of this facility in 2004. FA&A's February reuse assessment report identified two possible reuse alternatives for the remainder of this property - contingent upon the remedy selected by EPA for the lagoons. Reuse alternative 1 is based upon limited site development, and assumes that only Lagoon #1 is filled as part of the cleanup action. Reuse alternative 2 is based on greater site development, and assumes filling of Lagoon #1 and portions of lagoon #4 as part of the cleanup.

FA&A's reuse alternatives 1 and 2 for the lagoon site both include the following:

- walking trails
- seasonal skating rink
- warming hut with public restrooms
- soccer field
- equipment storage shed
- canoe/kayak launch area
- paved access road with parking
- water, sewer, and electrical utilities

Reuse alternative 2 also includes additional area for a ball field and lawn area. Potential site layout plans for these two alternatives are shown in figures 4 and 5.

Potential Use/Reuse Issues and Considerations: The selection of the remedy will likely dictate which reuse alternative can be implemented. EPA's proposed remedy is expected to call for the excavation of lagoons 1 and 5 and placement and capping of these materials in lagoons 3 and 4. This approach should allow the town to pursue their full reuse plan - alternative 2. Also, EPA's design of the remedy will be implemented in a manner consistent with the town's proposed reuse. Specifically, as part of the cleanup, the proposed WWTF location will be prepared for the town's construction. The cleanup and the WWTF construction will be coordinated to the maximum extent practicable. Also, the design of the restored lagoon areas will be contoured in order to be usable for the town's proposed ballfields.

The anticipated remedy would include institutional controls to prevent excavation of capped sludge materials and to prevent the consumption of groundwater at the lagoons.

As with the tannery building property, site ownership issues remain and are being addressed by the town.

► **Area #3 Warehouse Area**

Location: between Route 346 and railroad tracks

Current and Potential Future Uses: The warehouse property is currently vacant. As part of their reuse assessment, FA&A proposed two reuse alternatives for this property, contingent upon EPA's cleanup plan for the property. The two proposed alternatives are depicted in figures 6 and 7. Reuse alternative 1 assumes that the warehouse building remains in place and is available for use (for storage) and includes the addition of new water and sewer utilities. Reuse alternative 2 contemplates the demolition of the existing

warehouse, the construction of a new 22,000 square foot commercial building, addition of new water and sewer utilities, as well as a new paved parking area and access road.

Potential Use/Reuse Issues and Considerations: No further cleanup of the warehouse by EPA is warranted. The town may wish to demolish the building at their own expense. FA&A's market demand analysis indicated a slow local economy, with limited commercial growth at the former tannery site. FA&A cautioned that "...any new commercial reuse will require a strong business plan with suitable financial backing. ...consideration should be give to converting the warehouse site into a reuse more in keeping the recreation reuses" at the other two site areas identified above. To that end, FA&A also examined a third alternative, "alternative 2b", which would be implemented if it was determined that commercial reuse was not feasible due to funding constraints. This alternative contemplates the demolition of the warehouse building and conversion of the property into a parking area to serve the other areas of the site.

Also, as with the other areas of the site, site ownership issues remain and are being addressed by the town. No institutional controls at the warehouse parcel are believe to be warranted at this time.

► Area #4 Landfill

Location: Southwest of the former tannery building, along the western edge of the Hoosic River.

Current and Potential Future Uses: The landfill was capped as part of EPA's NTCRA, completed in 2001. The landfill area was not evaluated as part of FA&A's February 2001 Reuse Assessment. The town has no plans to take title to this property. Operation and maintenance activities to preserve the landfill's current condition is being addressed by the Vermont Department of Environmental Conservation (DEC)



Landfill area showing cap completed by EPA in 2001

Potential Use/Reuse Issues and Considerations: There is no current plan for transfer of title for this property or any future reuse plan. Future reuse plans will need to be closely coordinated with the state of Vermont, as they have primary responsibility for the long-term operation and maintenance of the landfill cap. EPA's planned Record of Decision may include institutional controls/deed restrictions for the landfill property - including restrictions on excavating or otherwise disturbing the capped area and to prevent consumption of groundwater underlying the property.

SECTION 3 - GENERAL FINDINGS/RECOMMENDATIONS

This section outlines follow-up actions by EPA to refine its understanding of the intended future uses of the site. This will enable EPA to consider these details, as appropriate, in the final remedy selection, design and implementation.

It is important to recognize that, because the individual site parcels are owned by private parties and/or the town of Pownal, EPA does not have direct control over their future use. Therefore, EPA's primary role will be in ensuring consideration of local reuse planning efforts in site response decisions and actions. This section provides a general framework for activities that EPA may undertake to help local stakeholders facilitate future land use (including potential reuse) at the site. Many of the details for assistance and collaboration will be worked out through future coordination with stakeholders.

This document is based on information that was readily available to the EPA case team. Also, the reuse issues and considerations identified in this section represent only a partial list of the potential site-specific factors that may need to be considered.

Potential Reuse Issues/Considerations

Project Timing: The final cleanup plan for the site has not yet been selected. EPA has presented a proposed cleanup plan to the public for comment. After public comments are considered, a final Record of Decision (ROD) will be published. EPA will take reasonable steps to accommodate the town's proposed future uses (e.g., final surface contouring, placement of equipment, scheduling of specific cleanup operations, etc.) during the design and construction of the remedy. Specifically, as part of the cleanup, the proposed WWTF location will be prepared for the town's construction. The cleanup and the WWTF construction will be coordinated to the maximum extent practicable. Also, the design of the restored lagoon areas will be contoured in order to be usable for the town's proposed ballfields.

Third Party Liability Concerns: It is possible that a party interested in acquiring all or part of this parcel will seek liability protection from EPA and the state, although the recently-passed federal Brownfields legislation may negate that need with respect to Superfund. In either event, EPA may need to work with key stakeholders (e.g., likely future owners, town officials, etc.) to communicate the Superfund liability structure and policies (including the recent Brownfields legislation), and available liability tools (PPAs, comfort letters, etc.). This is most applicable to the landfill area, as the town does not anticipate taking title to that portion of the site at this time.

Site Ownership/Control: The majority of the site is currently owned by Jan Exman/Pownal Development Corporation or by Flynn, the former tannery owner, with a mortgage held, but not foreclosed upon, by Exman. The town of Pownal is actively working with Exman to acquire the site property. Former site owners and/or operators have not conducted or funded any of the Superfund cleanup activities to date. Future site cleanup is expected to be funded from the Hazardous Substances Superfund, pending availability of funds. Substantial back taxes are owed for the property. EPA Superfund monies spent to date on study and cleanup exceed \$14 million and the future cleanup cost estimate is yet unknown.

Institutional Controls: It is expected that institutional controls, such as deed restrictions, will be required as part of the remedy at the site. These may include restrictions in designated areas on future soil excavation and construction activities and withdrawal and use of contaminated groundwater. The properties surrounding the site are not currently impacted by the groundwater contamination from the site. The Remedial Investigation results indicate that the site does not pose a future migration risk to any

public or private water supplies. Notwithstanding, local private well supplies continue to be sampled to ensure public safety.

Recommendations for Follow-up

1. Initial focus should be on the consideration of the town's proposed future recreational use in the remedy selection process. Further, once a remedy is selected, there may be an opportunity to accommodate redevelopment designs as part of the Remedial Design process.

Some of the specific items for consideration include:

- EPA's project plans and time line, and opportunities to consider redevelopment designs—WWTF and recreational plans.
- The town's or other future owner's expected plans and time lines for transfer, construction, and reuse.
- Coordination of cleanup activities and WWTF construction.
- Coordination of cleanup activities and redevelopment.
- The town's expected plan and time lines for acquisition, reuse planning and reuse implementation.
- Relevant EPA programs and potential reuse support resources (e.g., SRI program, smart growth, etc.).
- Potential uses of site during cleanup phase, if any.

Subsequent follow-up will depend on the town's construction and reuse plans and their timing in relation to cleanup activities. EPA will work closely with the town to coordinate our efforts.

2. Throughout the remedial process, EPA may be able to support site use/reuse through a number of activities, including:

- Making available guidance materials and providing technical assistance regarding EPA policies and requirements pertaining to site reuse.
- Issuance of PPAs and comfort letters, if necessary.
- Consideration of future land use in the implementation and scheduling of cleanup activities.
- Working with the town and/or other future owners to evaluate whether a planned use will adversely effect the remedy, pose undue risks or violate the terms of institutional controls.

APPENDIX A - Reference Documents Cited

Metcalfe & Eddy, 2001 - Remedial Investigation report - Pownal Tannery Superfund Site, Pownal, Vermont

Metcalfe & Eddy, 2002 - Feasibility Study report - Lagoon Area, Pownal Tannery Superfund Site, Pownal, Vermont

USEPA, 1999 - Action Memorandum for a Non-Time Critical Removal Action at the Pownal Tannery Superfund Site, Pownal Vermont

Forcier Aldrich & Associates, 2001 - Town of Pownal, Vermont - Pownal Tannery Superfund Reuse Assessment Report

USEPA, 2002 - Proposed Cleanup Plan for the Pownal Tannery Superfund Site, Pownal Vermont

Figure 2 in this report courtesy of Metcalfe & Eddy, Inc. and TRC, Inc., prepared under EPA RACS contract.

Figures 3 - 7 in this report courtesy of Forcier Aldrich & Associates and Greenman-Pedersen, Inc., prepared via a EPA Cooperative Agreement with the town of Pownal.



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