

177-1-10  
3  
Superfund Records Center  
SITE: PSC Resources  
BREAK: 20.01  
OTHER: 34568

# PSC Resources NPL Site Administrative Record

## Index

Compiled: March 20, 1992  
ROD Signed: September 15, 1992

Prepared for  
  
Region I  
Waste Management Division  
U.S. Environmental Protection Agency

With Assistance from  
  
**AMERICAN MANAGEMENT SYSTEMS, INC.**  
One Bowdoin Square, 7th Floor • Boston, Massachusetts 02114 • (617) 557-2000

## Introduction

This document is the Index to the Administrative Record for the Record of Decision for the PSC Resources, Inc. National Priorities List (NPL) site. Section I of the Index cites site-specific documents, and Section II cites guidance documents used by EPA staff in selecting a response action at the site.

This Administrative Record is available for public review at EPA Region I's Office in Boston, Massachusetts, and at the Palmer Public Library, 455 North Main Street, Palmer, Massachusetts 01069. Questions concerning the Administrative Record should be addressed to the EPA Region I site manager.

The Administrative Record is required by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA).

---

Section I  
Site-Specific Documents

# ADMINISTRATIVE RECORD INDEX

for the

## PSC Resources NPL Site

### 1.0 Pre-Remedial

#### 1.2 Preliminary Assessment

1. "Identification and Preliminary Assessment," EPA Region I (April 26, 1982).

#### 1.3 Site Inspection

1. "Site Inspection Report," EPA Region I (November 2, 1983).

#### 1.5 Correspondence Related to CERCLIS

1. Letter from William A. Doubleday, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Gunnar Erickson, Newtown Refining (June 3, 1977). Concerning agreements reached at the meeting regarding site conditions with the attached:
  - A. Memorandum from Paul H. Kwiatkowski, Commonwealth of Massachusetts Department of Environmental Quality Engineering to File (April 13, 1977). Concerning a complaint that contaminated water from the site is being pumped into the river.
  - B. "Water Pollution Source Information" Form, Town of Palmer Police Department (April 13, 1977). Concerning the discharging of contaminated water into the river.
  - C. "Water Pollution Source Information" Form, Town of Palmer Police Department (April 26, 1977). Concerning that oil from the site is on the street and in storm drains.
  - D. Memorandum from Paul H. Kwiatkowski, Commonwealth of Massachusetts Department of Environmental Quality Engineering to File (April 27, 1977). Concerning a complaint that oil from the site is on the street and in storm drains.
  - E. Memorandum from Paul H. Kwiatkowski, Commonwealth of Massachusetts Department of Environmental Quality Engineering to File (May 27, 1977). Concerning on-site investigation of oil spill.
2. Memorandum from Paul H. Kwiatkowski, Commonwealth of Massachusetts Department of Environmental Quality Engineering to File (July 6, 1977). Concerning inspections of the site and future construction plans.
3. Memorandum from Walter J. Nowak, Commonwealth of Massachusetts Department of Environmental Quality Engineering to File (April 4, 1978). Concerning an oil spill at the site.
4. Memorandum from Roland J. Dupuis, Commonwealth of Massachusetts Department of Environmental Quality Engineering to File (April 5, 1978). Concerning an inspection of the cleanup of the oil spill at the site.
5. Oil Spill Report, Commonwealth of Massachusetts Division of Water Pollution Control (July 29, 1978). Concerning an oil spill at the site.
6. Memorandum from William A. Doubleday, Commonwealth of Massachusetts Department of Environmental Quality Engineering to File (July 29, 1978) with attached "Record of Investigation." Concerning investigation of the oil spill at the site.

## 2.0 Removal Response

### 2.1 Correspondence

1. Letter from Roger S. Davis (Attorney for AgMet) to Francis S. Wright, Commonwealth of Massachusetts Office of the Attorney General (June 1, 1979). Concerning Charles Piscatelli's preliminary plans to clean up oil residue at the site.
2. Memorandum from Roland J. Dupuis, Commonwealth of Massachusetts Water Resources Commission to Stephen F. Joyce, Commonwealth of Massachusetts Water Resources Commission (June 20, 1980). Concerning waste removal at the site.
3. Trip Report on a Visit to PSC Resources Site, Harry Vandergrift, Commonwealth of Massachusetts Department of Environmental Quality Engineering (June 25, 1981) with attached field inspection notes. Concerning lack of drainage equipment at the site.
4. Memorandum from Peter E. Robar, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Stephen F. Joyce, Commonwealth of Massachusetts Water Resources Commission (July 24, 1981). Concerning a summary of information regarding the site.
5. Memorandum from Stephen F. Joyce, Commonwealth of Massachusetts Water Resources Commission to William Cass, Commonwealth of Massachusetts Department of Environmental Quality Engineering (November 25, 1981). Concerning abandonment of the site by the owner.
6. Trip Report on a Visit to PSC Resources Site, Peter E. Robar, Commonwealth of Massachusetts Department of Environmental Quality Engineering (December 21, 1981). Concerning routine inspection of the site.
7. Trip Report on a Visit to PSC Resources Site, Peter E. Robar and Richard M. Driscoll, Commonwealth of Massachusetts Department of Environmental Quality Engineering (March 5, 1982). Concerning security precautions at the site.
8. Memorandum from David Howland, Commonwealth of Massachusetts Department of Environmental Quality Engineering to File (March 11, 1982). Concerning telephone conversation with Fred R. Klebacher, New England Testing Lab regarding his role in testing at the site.
9. Trip Report on a Visit to PSC Resources Site, David Howland and Paul H. Kwiatkowski, Commonwealth of Massachusetts Department of Environmental Quality Engineering (March 17, 1982). Concerning inspection of security measures and of samples being taken from tanks.
10. Trip Report on a Visit to PSC Resources Site, Richard M. Driscoll, Commonwealth of Massachusetts Department of Environmental Quality Engineering (March 23, 1982). Concerning site assessment.
11. Trip Report on a Visit to PSC Resources Site, Peter E. Robar, Commonwealth of Massachusetts Department of Environmental Quality Engineering, Donald Berger, EPA Region I and Jeffrey Gillis, Ecology and Environment, Inc. (June 9, 1982). Concerning inspection of site for overall deterioration.
12. Trip Report on a Visit to PSC Resources Site, Paul H. Kwiatkowski and Dodie Hunnewell, Commonwealth of Massachusetts Department of Environmental Quality Engineering and Jeffrey Gillis, Ecology and Environment, Inc. (July 29, 1982). Concerning groundwater monitoring wells.
13. Trip Report on a Visit to PSC Resources Site, Richard M. Driscoll, Commonwealth of Massachusetts Department of Environmental Quality Engineering (January 13, 1983) with attached summary of manifested shipments. Concerning conditions at site after temporary termination of clean

## 2.1 Correspondence (cont'd.)

14. Trip Report on a Visit to PSC Resources Site, James Miller, Commonwealth of Massachusetts Department of Environmental Quality Engineering (September 19, 1983). Concerning status of cleanup activity.
15. Trip Report on a Visit to PSC Resources, James O'Brien, Commonwealth of Massachusetts Department of Environmental Quality Engineering and George Wilson and Gordon Fielding, Clean Harbors, Inc. (September 28, 1984) with attached probe data. Concerning a visit to scope out the parameters for the removal and disposal of liquid and sludge at the site.
16. Memorandum from James O'Brien, Commonwealth of Massachusetts Department of Environmental Quality Engineering to File (October 30, 1984). Concerning sampling requirements to be implemented at the site.
17. Letter from Stephen F. Joyce, Commonwealth of Massachusetts Department of Environmental Protection to Janis K. Tsang, EPA Region I (March 13, 1991). Concerning emergency repair of existing fence which surrounds the site.
18. Memorandum from Janis K. Tsang, EPA Region I to Lorenzo Thantu, EPA Region I (February 21, 1992). Concerning attached ATSDR Record of Activity.

## 2.3 Sampling and Analysis Data

1. Memorandum from Paul Clay, EPA Region I to John Hackler, EPA Region I (August 13, 1982). Concerning attached analysis summaries of tank samples.
2. Letter from F.R. Klebacher, New England Testing Laboratory to Carl Eidam, Jet-Line Services (January 12, 1984). Concerning attached report on samples of soil, sludge and water taken from the site.
3. Memorandum from Bill Sirull, EPA Region I to File (January 25, 1985). Concerning attached summary of soil, water and sediment samples.

## 2.4 Pollution Reports (POLREPs)

*The following POLREPs were issued for the first removal action:*

1. POLREP 1, EPA Region I, (June 29, 1982).
2. POLREP 2, EPA Region I, (November 9, 1982).
3. POLREP 3, EPA Region I, (December 2, 1982).
4. POLREP 4, EPA Region I, (December 29, 1982).
5. POLREP 5, EPA Region I, (January 13, 1983).
6. POLREP 6, EPA Region I, (February 23, 1983).
7. POLREP 9, EPA Region I, (July 1, 1983).
8. POLREP 11, EPA Region I, (August 8, 1983).
9. POLREP 13, EPA Region I, (September 12, 1983).
10. POLREP 14, EPA Region I, (September 28, 1983).
11. POLREP 15, EPA Region I.

*The following POLREPs were issued for the second removal action:*

12. POLREP 1, EPA Region I, (July 22, 1991).
13. POLREP 2, EPA Region I, (September 6, 1991).
14. POLREP 3, EPA Region I, (October 28, 1991).

## 2.6 Work Plans and Progress Reports

## Clean Harbors, Inc.

1. "Weekly Summary," Clean Harbors, Inc. (November 21, 1984 through December 20, 1984).
2. "Weekly Summary," Clean Harbors, Inc. (February 21, 1985 through March 20, 1985).
3. "Weekly Summary," Clean Harbors, Inc. (June 21, 1985 through July 20, 1985).
4. "PSC Resources Site Work and Cost Plan Revisions," Clean Harbors, Inc. (November 1, 1985).
5. "Weekly Summary," Clean Harbors, Inc. (December 20, 1985 through February 20, 1986).
6. "Work and Cost Summary," Clean Harbors, Inc. (July 7, 1986 through July 13, 1986).
7. "Daily Reports," Clean Harbors, Inc. (July 9, 1986 through July 11, 1986).
8. "Daily Reports," Clean Harbors, Inc. (July 14, 1986 through July 18, 1986).
9. "Work and Cost Summary," Clean Harbors, Inc. (July 14, 1986 through July 20, 1986).
10. "Work and Cost Summary," Clean Harbors, Inc. (July 21, 1986 through July 27, 1986).
11. "Daily Reports," Clean Harbors, Inc. (July 21, 1986 through August 1, 1986).

## Ecology and Environment, Inc.

12. Trip Report on a Visit to PSC Resources Site, Jeffrey Gillis, Ecology and Environment, Inc. (June 22, 1982). Concerning collection of water and sediment samples, and progress at the site.
13. Trip Report on a Visit to PSC Resources Site, Jeffrey Gillis, Ecology and Environment, Inc. (June 28, 1982). Concerning verification of completion of preliminary remedial work at the site.

## Environmental Management Corporation

14. "Proposal for Remedial Work at 10 Water Street, Palmer, Massachusetts," Environmental Management Corporation (February 1983).
15. Progress Report, Environmental Management Corporation (April 7, 1983).
16. Progress Report, Environmental Management Corporation (April 18, 1983).
17. "Proposed Phase II Site Clean-Up Plan for Newtown Oil Refinery," Environmental Management Corporation (July 25, 1983).

## O.H. Materials Co.

18. Daily Reports, O.H. Materials Co. (December 3, 1982 through December 17, 1982).
19. Progress Report, Bingham, Dana & Gould (Attorney for Newtown Oil Refinery) for O.H. Materials Co. (January 13, 1983).

## 2.7 Cost Reports and Invoices

1. Letter from George Wilson, Clean Harbors, Inc. to James Miller, Commonwealth of Massachusetts Department of Environmental Quality Engineering (October 11, 1984). Concerning a cost proposal for removing contaminants from the surface of the site.

## 3.0 Remedial Investigation (RI)

### 3.1 Correspondence

1. Letter from Andrew H. Baldwin, E.C. Jordan Co. to Jay Copeland, Massachusetts Natural Heritage Program (January 14, 1988). Concerning an investigation of the site for endangered species.
2. Telephone Notes Between Jan Handke, E.C. Jordan Co. and Howard Case, former Town of Palmer Community Hazardous Waste Coordinator (January 25, 1988). Concerning exposure assessments.
3. Telephone Notes Between Jan Handke, E.C. Jordan Co. and Jeff Jambora, Town of Palmer Community Hazardous Materials Coordinator (January 25, 1988). Concerning potentially exposed populations in the Town of Palmer.
4. Memorandum from Jan Handke, E.C. Jordan Co. to Andrew H. Baldwin, P. Huidobro, and L. Spahr, E.C. Jordan Co. (January 26, 1988). Concerning private water supply for the Town of Monson.
5. Telephone Notes Between Jan Handke, E.C. Jordan Co. and Elmer Harris, Town of Palmer Fire Department (January 26, 1988). Concerning potentially exposed populations in Monson.
6. Letter from Jay Copeland, Massachusetts Natural Heritage Program to Andrew H. Baldwin, E.C. Jordan Co. (January 29, 1988). Concerning endangered species at the site.
7. Telephone Notes Between Douglas S. Pierce, E.C. Jordan Co. and Kevin Sheehan, Commonwealth of Massachusetts Department of Environmental Quality Engineering (July 19, 1988). Concerning geophysical surveys and the field operations plan.
8. Letter from Jocelyn Boesch, E.C. Jordan Co. and Kevin Sheehan, Commonwealth of Massachusetts Department of Environmental Quality Engineering (October 17, 1988) with attached "DEQE SARSS Contract Change Order." Concerning sample location changes.
9. Letter from Douglas S. Pierce, E.C. Jordan Co. to Kevin Sheehan, Commonwealth of Massachusetts Department of Environmental Quality Engineering (October 25, 1988). Concerning permeability testing of new monitoring wells.
10. Letter from Ellen C. Regan, HMM Associates, Inc. to Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection (November 1, 1989). Concerning additional sampling of groundwater.
11. Letter from Richard Cote, HMM Associates, Inc. to Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection (January 10, 1990). Concerning a summary of data collected to support the wetland assessment.
12. "Health and Safety Short Form," HMM Associates, Inc. (April 5, 1990). Concerning additional contaminant information to be used in conjunction with the existing health and safety plan.

## 3.1 Correspondence (cont'd.)

13. Memorandum from Laura Rome, Commonwealth of Massachusetts Department of Environmental Protection to Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection (August 9, 1990) with attachments. Concerning foreseeable uses for the site.
14. Letter from Lorenzo Thantu, EPA Region I to Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection (September 15, 1990). Concerning additional field work EPA believes should be performed to complete the ecological risk assessment associated with the site.
15. Letter from John W. McTigue, HMM Associates, Inc. to Lorenzo Thantu, EPA Region I (October 12, 1990). Concerning Contract Laboratory Program (CLP) analyses and projected deliverable schedules for the health risk assessment and a draft of the remedial investigation/feasibility study report.
16. Letter from John W. McTigue, HMM Associates, Inc. to Lorenzo Thantu, EPA Region I (January 21, 1991). Concerning EPA directives to HMM regarding data validation.
17. Letter from Hank Southworth, Commonwealth of Massachusetts Department of Environmental Protection to James O'Brien, HMM Associates, Inc. (January 28, 1991). Concerning cyanide sampling at the site.

## 3.2 Sampling and Analysis Data

*Sampling and Analysis Data for the Remedial Investigation may be reviewed, by appointment only, at EPA Region I, Boston, Massachusetts.*

## 3.3 Scopes of Work

1. Letter from Richard Cote, HMM Associates, Inc. to Janine Commerford and Paul Campagna, Commonwealth of Massachusetts Department of Environmental Protection and Marilyn Wade, EPA Region I (January 9, 1990). Concerning transmittal of summary of remedial tasks, schedule and budget proposed to satisfy data gaps identified in remedial investigation.
2. Letter from Richard Cote, HMM Associates, Inc. to Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection and Lorenzo Thantu, EPA Region I (September 5, 1990). Concerning transmittal of the supplemental scope of work.
3. "Attachment 1 - Proposed Scope of Work for a Public Health Risk Assessment." Alceon, Inc. for HMM Associates, Inc. (September 12, 1990).
4. Letter from Richard Cote, HMM Associates, Inc. to Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection and Lorenzo Thantu, EPA Region I (September 27, 1990). Concerning transmittal of the supplemental scope of work.
5. "Scope of Work for Ecological Risk Assessment," Menzie-Cura Associates, Inc. for HMM Associates, Inc. (December 1990).
6. "Technical Scope of Work for the Revised Human Health Risk Assessment," HMM Associates, Inc. (August 7, 1991).

### 3.4 Interim Deliverables

#### Reports

1. "Draft Remedial Action Master Plan," NUS Corporation (April 1983).
2. "Quality Assurance Program Plan," E.C. Jordan Co. for Commonwealth of Massachusetts Department of Environmental Quality Engineering (December 1987).
3. "Health and Safety Plan," E.C. Jordan Co. for Commonwealth of Massachusetts Department of Environmental Quality Engineering (February 1988).
4. Letter Report from Douglas S. Pierce, E.C. Jordan Co. to Kevin Sheehan, Commonwealth of Massachusetts Department of Environmental Quality Engineering (July 19, 1988). Concerning Preliminary Risk Assessment and Preliminary Remedial Response Objectives.
5. "Field Operations Plan," E.C. Jordan Co. for Commonwealth of Massachusetts Department of Environmental Quality Engineering (August 1988).

#### Comments

6. Comments Dated June 22, 1983 from Pi-Yun Tsai and Clara Chow, EPA Region I on the April 1983 "Remedial Action Master Plan," NUS Corporation.
7. Comments Dated June 27, 1983 from Dennis P. Gagne, EPA Region I on the April 1983 "Remedial Action Master Plan," NUS Corporation.
8. Comments Dated July 7, 1983 from Dennis P. Gagne, EPA Region I on the April 1983 "Remedial Action Master Plan," NUS Corporation.
9. Comments Dated July 11, 1983 from Steven A. DeGabriele, Commonwealth of Massachusetts Department of Environmental Quality Engineering on the April 1983 "Remedial Action Master Plan," NUS Corporation.
10. Comments Dated July 12, 1983 from Joan E. Thomas, Commonwealth of Massachusetts Department of Environmental Quality Engineering on the April 1983 "Remedial Action Master Plan," NUS Corporation.
11. Comments Dated April 14, 1988 from Peter R. Kahn, EPA Region I on the December 1987 "Quality Assurance Program Plan," E.C. Jordan Co. for Commonwealth of Massachusetts Department of Environmental Quality Engineering.

### 3.6 Remedial Investigation (RI) Reports

1. "Remedial Investigation - Volume I," HMM Associates, Inc. for Commonwealth of Massachusetts Department of Environmental Protection (January 1992).
2. "Remedial Investigation - Volume II," HMM Associates, Inc. for Commonwealth of Massachusetts Department of Environmental Protection (January 1992).
3. "Remedial Investigation - Volume III," HMM Associates, Inc. for Commonwealth of Massachusetts Department of Environmental Protection (January 1992).
4. "Remedial Investigation - Volume IV," HMM Associates, Inc. for Commonwealth of Massachusetts Department of Environmental Protection (January 1992).

### 3.7 Work Plans and Progress Reports

1. "PSC Resources Site - RI/FS Work Plan," E.C. Jordan Co. for Commonwealth of Massachusetts Department of Environmental Quality Engineering (August 1987).
2. Memorandum from Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection to File (October 18, 1989). Concerning monthly progress report.
3. Memorandum from Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection to File (June 27, 1990). Concerning monthly progress report.
4. Memorandum from Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection to File (July 25, 1990). Concerning monthly progress report.
5. Memorandum from Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection to File (October 31, 1990). Concerning monthly progress report.
6. Memorandum from Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection to File (December 12, 1990). Concerning monthly progress report.
7. Memorandum from Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection to File (January 25, 1991). Concerning monthly progress report.

### 3.9 Health Assessments

1. "Preliminary Health Assessment," Commonwealth of Massachusetts Department of Public Health for U.S. Department of Health and Human Services Agency Toxic Substances and Disease Registry (ATSDR) (April 18, 1989).

## 4.0 Feasibility Study (FS)

### 4.6 Feasibility Study (FS) Reports

1. "Feasibility Study - Volume I," HMM Associates, Inc. for Commonwealth of Massachusetts Department of Environmental Protection (January 1992).
2. "Feasibility Study - Volume II," HMM Associates, Inc. for Commonwealth of Massachusetts Department of Environmental Protection (January 1992).

### 4.9 Proposed Plans for Selected Remedial Action

1. "EPA Proposes Cleanup Plan for the PSC Resources, Inc. Superfund Site," EPA Region I (March 1992).

### Comments

*Comments on the Feasibility Study and Proposed Plan received by EPA Region I during the formal public comment period are filed and cited in 5.3 Responsiveness Summaries.*

## 5.0 Record of Decision (ROD)

## 5.1 Correspondence

1. Letter from a Massachusetts Resident to Lorenzo Thantu, EPA Region I (March 24, 1992). Concerning a water treatment for cleanup of the site.
2. Meeting Notes, Commonwealth of Massachusetts Department of Environmental Protection, Commonwealth of Massachusetts Department of Public Health and EPA Region I (April 21, 1992 - 6:00p.m.). Concerning informal discussion held regarding the proposed plan and potential risks posed by the site.
3. Letter from Felicity Hardee, Bulkley, Richardson and Gelinias (Attorney for New England Door Closer) to Lorenzo Thantu, EPA Region I (May 29, 1992). Concerning EPA's failure to comply with CERCLA requirements regarding public participation procedures for the proposed remedy.

## 5.2 Applicable or Relevant and Appropriate Requirements (ARARs)

1. Letter from Helen Waldorf, Commonwealth of Massachusetts Department of Environmental Protection to Lorenzo Thantu, EPA Region I (May 29, 1992). Concerning compliance with state ARARs that are relevant to the cleanup options of the site.

## 5.3 Responsiveness Summaries

1. Cross-Reference: Responsiveness Summary, EPA Region I (September 15, 1992) [Filed and included as an Appendix to entry number 1 in 5.4 Record of Decision (ROD)].

*The following citations indicate written comments received by EPA Region I during the formal comment period:*

2. Letter from Felicity Hardee, Bulkley, Richardson and Gelinias (Attorney for New England Door Closer) to Richard Cavagnero, EPA Region I (April 6, 1992). Concerning request for an extension to the public comment period.
3. Letter from Annette Haley and Elizabeth Hancock, Ware River Preservation Society to Lorenzo Thantu, EPA Region I (April 14, 1992). Concerning request for an extension to the public comment period.
4. Letter from Robert L. Quinn, Egan, Flanagan and Cohen (Attorney for Tyler Equipment Corporation) to Lorenzo Thantu, EPA Region I (April 16, 1992). Concerning request for an extension to the public comment period.
5. Letter from Martin C. Pentz, Nutter, McClennen & Fish (Attorney for Sprague Electric Company) to Lorenzo Thantu, EPA Region I (April 20, 1992). Concerning request for an extension to the public comment period.
6. Letter from F. David Trickey, TRW, Inc. to Lorenzo Thantu, EPA Region I (April 20, 1992). Concerning request for an extension to the public comment period.
7. Letter from Seth D. Jaffee, Foley, Hoag & Eliot (Attorney for Massachusetts Turnpike Authority) to Lorenzo Thantu, EPA Region I (April 22, 1992). Concerning request for an extension to the public comment period.
8. Comments Dated May 29, 1992 from Michael J. Webster and Leonard C. Sarapas, Balsam Environmental Consultants for PSC Resources Potentially Responsible Party Group on the March 1992 "EPA Proposes Cleanup Plan for the PSC Resources, Inc. Superfund Site," EPA Region I.

#### 5.4 Record of Decision (ROD)

1. Record of Decision for PSC Resources, Inc., EPA Region I (September 15, 1992).

#### 9.0 State Coordination

##### 9.1 Correspondence

1. Letter from James C. Colman, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Ruth Leabman, EPA Region I (January 16, 1986). Concerning official request to amend the Multi-Site Cooperative Agreement with the attached:
  - A. Letter from Madeline Snow, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Beverly Boyle, Commonwealth of Massachusetts Department of Environmental Quality Engineering (December 12, 1985). Concerning the Multi-Site Cooperative Agreement with EPA Region I.
  - B. "Site History and Remedial Objectives."
  - C. Multi-Site Cooperative Agreement Amendment.
2. Letter from William F. Cass, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Linda Murphy, EPA Region I (July 30, 1987) with attached "Exhibit 3-3: Development and Execution of a Cooperative Agreement." Concerning confirmation that the Commonwealth of Massachusetts Division of Hazardous Waste would lead for the RI/FS tasks at the site.
3. Letter from James C. Colman, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Merrill S. Hohman, EPA Region I (July 6, 1989). Concerning time extension on the cooperative agreement.
4. Letter from William Walsh-Rogalski, EPA Region I to Ann Bingham, Commonwealth of Massachusetts Department of Environmental Quality Engineering (August 18, 1988). Concerning development of a State Memorandum of Agreement.
5. Letter from Daniel S. Greenbaum, Commonwealth of Massachusetts Department of Environmental Protection to Henry G. Burrell, EPA Region I (August 24, 1989). Concerning certification of contractors.
6. Letter from Carolyn R. Levinson, Commonwealth of Massachusetts Department of Environmental Protection to Henry G. Burrell, EPA Region I (September 11, 1989). Concerning missing documentation regarding certification of contractors.
7. Letter from Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection to Merrill S. Hohman, EPA Region I (March 29, 1990). Concerning A95 Clearinghouse Review of the Multi-Site Cooperative Agreement Amendment.
8. Letter from Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection to Beverly Boyle, Commonwealth of Massachusetts Department of Environmental Protection (March 30, 1990). Concerning A95 Clearinghouse Review of the Multi-Site Cooperative Agreement Amendment.
9. Memorandum from Joyce P. Salvo, EPA Region I to Marilyn Wade, EPA Region I (April 9, 1990) with attached budget. Concerning review of the Commonwealth of Massachusetts Department of Environmental Protection's funding application.

## 9.1 Correspondence (cont'd.)

10. Letter from Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection to Joyce P. Salvo, EPA Region I (May 30, 1990). Concerning the Multi-Site Cooperative Agreement Amendment with attached Letter from James R. Malone, Commonwealth of Massachusetts Executive Office of Communities & Development to Janine Commerford. Commonwealth of Massachusetts Department of Environmental Protection (May 17, 1990).
11. Letter from Carolyn R. Levinson, Commonwealth of Massachusetts Department of Environmental Protection to Henry G. Burrell, EPA Region I (July 9, 1990). Concerning the certification of contractors.
12. Letter from Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection to Beverly Boyle. Commonwealth of Massachusetts Department of Environmental Protection (September 5, 1990). Concerning the A95 Clearinghouse Review of the Multi-Site Cooperative Agreement amendment.
13. Letter from Daniel S. Greenbaum, Commonwealth of Massachusetts Department of Environmental Protection to Henry G. Burrell, EPA Region I (September 11, 1990). Concerning certification of contractors.
14. Memorandum from Lorenzo Thantu, EPA Region I to Deborah Harstedt, EPA Region I (September 12, 1990) with attachments. Concerning the Commonwealth of Massachusetts Department of Environmental Protection's requested amendment to the Multi-Site Cooperative Agreement.
15. Commitment Notice, EPA Region I (September 12, 1990). Concerning amendment to the Multi-Site Cooperative Agreement.
16. Memorandum from Lorenzo Thantu, EPA Region I to Ruth Leabman, EPA Region I (September 24, 1990). Concerning the Commonwealth of Massachusetts Department of Environmental Protection's requested amendment to the Multi-Site Cooperative Agreement.
17. Letter from James R. Malone, Commonwealth of Massachusetts Executive Office of Communities & Development to Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection (September 25, 1990). Concerning review of request for funding to conduct the remedial investigation and feasibility study of the site.
18. Letter from Daniel S. Greenbaum, Commonwealth of Massachusetts Department of Environmental Protection to Henry G. Burrell, EPA Region I (November 30, 1990). Concerning certification of contractors.
19. Letter from William Walsh-Rogalski, EPA Region I to Peter Bronson, Commonwealth of Massachusetts Department of Environmental Protection (January 9, 1991). Concerning the attached draft document regarding the Massachusetts Contingency Plan.
20. Letter from Carolyn R. Levinson, Commonwealth of Massachusetts Department of Environmental Protection to Henry G. Burrell, EPA Region I (February 8, 1991). Concerning confusion regarding certification of contractors.
21. Letter from Joyce P. Salvo for Henry G. Burrell, EPA Region I to Daniel S. Greenbaum, Commonwealth of Massachusetts Department of Environmental Protection (February 13, 1991). Concerning authorization to proceed with the certification of contractors.
22. Letter from Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection to Lorenzo Thantu, EPA Region I (May 30, 1991). Concerning DEP's request to increase funding and extend Cooperative Agreement through June 30, 1991.

## 9.1 Correspondence (cont'd.)

23. Memorandum from Lorenzo Thantu, EPA Region I to Deborah Harstedt, EPA Region I (June 24, 1991) with attachments. Concerning amendment to Cooperative Agreement.
24. Letter from Roger Provost, Commonwealth of Massachusetts Executive Office of Communities & Development to Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection (July 16, 1991). Concerning review of request for additional funds.
25. Letter from Julie Belaga, EPA Region I to Daniel S. Greenbaum, Commonwealth of Massachusetts Department of Environmental Protection (August 6, 1991) with attached "EPA Assistance Agreement/Amendment." Concerning approval of Mr. Greenbaum's request for additional funding.
26. Letter from Helen Waldorf, Commonwealth of Massachusetts Department of Environmental Protection to Richard Cavagnero, EPA Region I (December 20, 1991). Concerning the request to include the Draft Human Health Risk Assessment in the Administrative Record.
27. Letter from Richard Cavagnero, EPA Region I to Helen Waldorf, Commonwealth of Massachusetts Department of Environmental Protection (January 21, 1992). Concerning exclusion of the Draft Human Health Risk Assessment from the Administrative Record because this document was not relied upon in EPA's decision-making process.

## 9.2 Cooperative Agreements

1. Letter from William F. Cass, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Merrill S. Hohman, EPA Region I (September 15, 1987) with attachment. Concerning development of the Cooperative Agreement.
2. "EPA Assistance Agreement/Amendment," EPA Region I (September 30, 1987).
3. Memorandum from Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection to Daniel McGillicuddy, Commonwealth of Massachusetts Department of Environmental Protection (March 21, 1990). Concerning attached application for amendment to the Cooperative Agreement.
4. "EPA Assistance Agreement/Amendment," EPA Region I (July 26, 1990).
5. Letter from Julie Belaga, EPA Region I to Daniel S. Greenbaum, Commonwealth of Massachusetts Department of Environmental Protection (October 3, 1990) with attached "EPA Assistance Agreement/Amendment." Concerning approval of application for additional funding.
6. Memorandum from Lorenzo Thantu, EPA Region I to Deborah Harstedt, EPA Region I (December 4, 1991) with attachments. Concerning the amendment of the cooperative agreement with the Commonwealth of Massachusetts Department of Environmental Protection to extend the period of the agreement and increase funding.
7. Letter from Julie Belaga, EPA Region I to Daniel S. Greenbaum, Commonwealth of Massachusetts Department of Environmental Protection (March 2, 1992) with attached "EPA Assistance Agreement/Amendment." Concerning approval of application for additional funding.
8. Letter from William Harkins, Commonwealth of Massachusetts Department of Environmental Protection to Henry Burrell, EPA Region I (July 6, 1992) with attached "Application for Federal Assistance." Concerning request for a no-cost time extension and an application for additional funding.

## 9.2 Cooperative Agreements (cont'd.)

9. Letter from Julie Belaga, EPA Region I to Daniel S. Greenbaum, Commonwealth of Massachusetts Department of Environmental Protection (August 10, 1992) with attached "EPA Assistance Agreement/Amendment." Concerning approval of application for additional funding.
10. Memorandum from Lorenzo Thantu, EPA Region I to Deborah Harstedt, EPA Region I (August 24, 1992). Concerning an amendment to the existing Cooperative Agreement for additional funding with the attached:
  - A. Commitment Notice, EPA Region I (August 24, 1992).
  - B. Letter from Janine Commerford, Commonwealth of Massachusetts Department of Environmental Protection to Merrill S. Hohman, EPA Region I (August 19, 1992). Concerning application for an A95 Clearinghouse Review of Amendment.
  - C. Letter from James C. Colman, Commonwealth of Massachusetts Department of Environmental Protection to Merrill S. Hohman, EPA Region I (August 19, 1992) with attached "Application for Federal Assistance." Concerning an amendment to the existing Cooperative Agreement for additional funding.

## 9.5 Quarterly Progress Reports

1. Letter from Helen Waldorf, Commonwealth of Massachusetts Department of Environmental Protection to Marilyn Wade, EPA Region I (January 19, 1990) with attachments. Concerning expenditures and work completed as of September 1989.
2. Letter from Helen Waldorf, Commonwealth of Massachusetts Department of Environmental Protection to Marilyn Wade, EPA Region I (July 27, 1990) with attachments. Concerning expenditures and work completed as of December 1989.
3. Letter from Helen Waldorf, Commonwealth of Massachusetts Department of Environmental Protection to Marilyn Wade, EPA Region I (November 29, 1990) with attachments. Concerning expenditures and work completed as of March 1990.

## 10.0 Enforcement

## 10.3 State and Local Enforcement Records

1. Letter from Leslie Carothers, EPA Region I to David Marynaski, PSC Resources, Inc. (August 16, 1976). Concerning violations of the EPA Oil Pollution Prevention Regulations (40 CFR Part 112) at the site on July 8, 1976.
2. Memorandum from Paul H. Kwiatkowski, Commonwealth of Massachusetts Department of Environmental Quality Engineering to File (February 28, 1979). Concerning inspection of storage tanks at the site.
3. "Water Pollution Source Information" Form, Town of Palmer Police Department (March 8, 1979). Concerning request to pump out tanks at the site.
4. Notice of Filing Petition for Removal to United States District Court, *Commonwealth of Massachusetts v. Refinemet International Co., et al*, Superior Court, Civil No. 55849 (August 6, 1982).

## 10.3 State and Local Enforcement Records (cont'd.)

5. Letter from Nancy B. Glimcher, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Raymond G. Dougan, Commonwealth of Massachusetts Office of the Attorney General (November 16, 1984). Concerning the transmittal of the attached "Claim of Lien" filed in the Hampden County Registry of Deeds.
6. Letter from Raymond G. Dougan, Commonwealth of Massachusetts Office of the Attorney General to John J. McNaught, United States District Court (April 30, 1986). Concerning the notice of voluntary dismissal of the defendants in the *Commonwealth of Massachusetts v. Refinemet International* Civil Action.
7. Letter from Raymond G. Dougan, Commonwealth of Massachusetts Office of the Attorney General to Clerk, United States District Court (April 30, 1986). Concerning transmittal of the notice of voluntary dismissal of the defendants in the *Commonwealth of Massachusetts v. Refinemet International*.
8. Complaint, *Commonwealth of Massachusetts v. Refinemet International Co., et al*, Superior Court Department of Trial Court, Civil Action No. 82-2288-MC.
9. Proposed Stipulation and Interlocutory Agreement, *Department of Environmental Quality Engineering and the Attorney General of the Commonwealth of Massachusetts v. Refinemet International*, Superior Court, Civil Action.

## 11.0 Potentially Responsible Party (PRP)

## 11.9 PRP-Specific Correspondence

1. Letter from Peter Nicholas, Milton Bradley Company to Lorenzo Thantu, EPA Region I (April 16, 1992). Concerning request for additional time to respond to being named a PRP by EPA.

## 11.14 Title Searches

1. Memorandum from William F. Hanscom, EPA Region I to Lorenzo Thantu, EPA Region I (May 22, 1991). Concerning ownership history of the site.

## 13.0 Community Relations

## 13.1 Correspondence

1. Letter from Helen Waldorf, Commonwealth of Massachusetts Department of Environmental Protection to Board of Selectmen, Town of Palmer (March 8, 1991). Concerning a request for more police patrols around the area of the site.
2. Letter from Alan Weinberg, Commonwealth of Massachusetts Department of Environmental Protection to Beverly A. Lund, Board of Selectmen, Town of Palmer (June 15, 1991). Concerning results of soil and water samples.

## 13.2 Community Relations Plans

1. "Community Relations Plan - Revised," Commonwealth of Massachusetts Department of Environmental Quality Engineering (August 1986).
2. "Revised Community Relations Plans," TRC Companies (November 1991).

### 13.3 News Clippings/Press Releases

#### News Clippings

1. "Water St. Contamination Hearing," The Journal Register, Palmer, MA (February 21, 1991).
2. "Massachusetts Department of Environmental Protection and U.S. Environmental Protection Agency Announce A Public Meeting On The PSC Resources Superfund Site," The Journal Register, Palmer, MA (February 21, 1991).
3. "Cleanup Slated for Waste Site," Union-News, Springfield, MA. (March 24, 1992).
4. "Town's Long Wait for Cleanup of Toxic Site Nearing an End," (1992).
5. "Waste Site Cleanup to Begin in May," The Springfield Daily, Springfield, MA.
6. "PSC Site Clean-up Ending in Palmer," The Springfield Daily, Springfield, MA.
7. "Waste Site Clean Up Planned in Palmer."

#### Press Releases

8. "DEQE Begins Work at Palmer Hazardous Waste Site." Commonwealth of Massachusetts Department of Environmental Quality Engineering (July 16, 1986).
9. "Environmental News - EPA and State to Hold Public Meeting on PSC Resources Superfund Site," EPA Region I (February 15, 1991).
10. "Environmental News - EPA to Construct Fence Around PSC Resources Superfund Site," EPA Region I (August 15, 1991).
11. "Environmental News - EPA Announces Plan for Cleanup of PSC Resources Superfund Hazardous Waste Site in Palmer, MA," EPA Region I (March 23, 1992).
12. "Environmental News - Comment Period Extended at Request of Public for PSC Resources Superfund Site in Palmer, MA," EPA Region I (April 17, 1992).

### 13.4 Public Meetings

1. "PSC Resources Superfund Site Public Meeting Summary," EPA Region I (February 27, 1991).
2. Public Hearing for Feasibility Study and Proposed Plan for Cleanup, EPA Region I (April 21, 1992 - 7:30p.m.).

### 13.5 Fact Sheets

1. "Hazardous Waste Site Fact Sheet," Commonwealth of Massachusetts Department of Environmental Quality Engineering. Concerning background information and assessment of the cleanup operation.

### 13.8 Scopes of Work

1. Memorandum from Lorenzo Thantu, EPA Region I to Nancy Barmakian and Diane Kelley, EPA Region I (August 28, 1990). Concerning transmittal of attached scope of work.

## 17.0 Site Management Records

### 17.1 Correspondence

1. Letter from Stephen F. Joyce, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Chief Executive Officer, Newtown Refining Corporation (July 22, 1988). Concerning failure to conduct actions called for in the notice of responsibility letter.

### 17.2 Access Records

1. Letter from Stephen F. Joyce, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Robert Heffner (July 22, 1988). Concerning notice of request for property access.
2. Letter from Stephen F. Joyce, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Roger A. Grimshaw (July 22, 1988). Concerning notice of request for property access.
3. Letter from Stephen F. Joyce, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Cynthia Witek-Brandon (July 22, 1988). Concerning notice of request for property access.
4. Letter from Stephen F. Joyce, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Donald R. and Linda Spink (July 22, 1988). Concerning notice of request for property access.
5. Telephone Notes Between Douglas S. Pierce, E.C. Jordan Co. and Paul Campagna, Commonwealth of Massachusetts Department of Environmental Quality Engineering (September 14, 1988). Concerning access to disputed parcel of land near the site.

### 17.4 Site Photographs/Maps

*The photographs cited in entry number 1 may be reviewed, by appointment only, at EPA Region I, Boston, Massachusetts.*

1. Color Aerial Photographs of Site, Roy F. Weston, Inc. (May 11, 1991).

*All other photographs and maps associated with the site may be reviewed, by appointment only, at EPA Region I, Boston, Massachusetts.*

## 18.0 Initial Remedial Measure (IRM) Records

### 18.8 Action Memoranda

1. Memorandum from Merrill S. Hohman, EPA Region I to Michael R. Deland, EPA Region I (February 14, 1986). Concerning a request for authorization to proceed with the implementation of an Initial Remedial Measure at the site.

Section II  
Guidance Documents

## GUIDANCE DOCUMENTS

EPA guidance documents may be reviewed at EPA Region I, Boston, Massachusetts.

### General EPA Guidance Documents

1. U.S. Environmental Protection Agency. Office of Research and Development. Municipal Environmental Research Laboratory. Biodegradation and Treatability of Specific Pollutants (EPA-600/9-79-034), October 1979.
2. U.S. Environmental Protection Agency. Office of Pesticides and Toxic Substances. Toxics Information Series: Asbestos, April 1980.
3. U.S. Environmental Protection Agency. Office of Research and Development. Municipal Environmental Research Laboratory. Carbon Adsorption Isotherms for Toxic Organics (EPA-600/8-80-023), April 1980.
4. U.S. Environmental Protection Agency. Office of Water and Waste Management. Evaluating Cover Systems for Solid and Hazardous Waste, 1980.
5. U.S. Environmental Protection Agency. Office of Research and Development. Municipal Environmental Research Laboratory. Handbook for Evaluating Remedial Action Technology Plans (EPA-600/2-83-076), August 1983.
6. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response, Office of Emergency and Remedial Response, and Office of Research and Development. Review of In-Place Treatment Techniques for Contaminated Surface Soils - Volume 1: Technical Evaluation (EPA-540/2-84-003a), September 1984.
7. "Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act: Final Rule and Interim Final Rule and Proposed Rule" (40 CFR Part 136), October 26, 1984.
8. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Hazardous Response Support Division. Standard Operating Safety Guides, November 1984.
9. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Guidance Document for Cleanup of Surface Tank and Drum Sites (OSWER Directive 9380.0-3), May 28, 1985.
10. U.S. Environmental Protection Agency. Office of Research and Development. Environmental Research Laboratory. EPA Guide for Minimizing the Adverse Environmental Effects of Cleanup of Uncontrolled Hazardous Waste Sites, (EPA-600/8-85/008), June 1985.
11. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Guidance on Feasibility Studies under CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) (EPA/540/G-85/003, OSWER Directive 9355.0-05C), June 1985.
12. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Guidance on Remedial Investigations under CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) (EPA/540/G-85/002, OSWER Directive 9355.0-06B), June 1985.

13. Memorandum from Gene Lucero to the U.S. Environmental Protection Agency, August 28, 1985 (discussing community relations at Superfund Enforcement sites).
14. U.S. Environmental Protection Agency. Office of Waste Programs Enforcement. The Endangerment Assessment Handbook, August 1985.
15. U.S. Environmental Protection Agency. Office of Waste Programs Enforcement. Toxicology Handbook, August 1985.
16. U.S. Department of Health and Human Services. National Institute for Occupational Safety and Health, and Occupational Safety and Health Administration. Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities, October 1985.
17. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Handbook of Remedial Action at Waste Disposal Sites (EPA/625/6-85/006), October 1985.
18. U.S. Environmental Protection Agency. Office of Research and Development. Hazardous Waste Engineering Research Laboratory. Handbook: Remedial Action at Waste Disposal Sites (Revised) (EPA/625/6-85/006), October 1985.
19. "National Oil and Hazardous Substances Pollution Contingency Plan," (40 CFR Part 300), November 20, 1985.
20. U.S. Environmental Protection Agency. Office of Health and Environmental Assessment. Development of Advisory Levels for Polychlorinated Biphenyls (PCBs) Cleanup (OHEA-E-187), May 1986.
21. U.S. Environmental Protection Agency. Office of Research and Development. Hazardous Waste Engineering Research Laboratory. Handbook for Stabilization/Solidification of Hazardous Wastes (EPA/540/2-86/001), June 1986.
22. U.S. Environmental Protection Agency. Office of Research and Development. Hazardous Waste Engineering Research Laboratory. Treatment Technology Briefs: Alternatives to Hazardous Waste Landfills (EPA/600/8-86/017), July 1986.
23. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Guidance on Remedial Actions for Contaminated Groundwater at Superfund Sites (OSWER Directive 9283.1-2), December 1988.
24. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response and Office of Emergency and Remedial Response. Mobile Treatment Technologies for Superfund Wastes (EPA 540/2-86/003 (f)), September 1986.
25. U.S. Environmental Protection Agency. Comprehensive Environmental Response, Compensation, and Liability Act of 1980, amended October 17, 1986.
26. "Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and Dibenzofurans (CDDs and CDFs)," EPA Region I, October 1986.
27. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Superfund Public Health Evaluation Manual (OSWER Directive 9285.4-01), October 1986.

28. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Interim Guidance on Superfund Selection of Remedy (OSWER Directive 9355.0-19), December 24, 1986.
29. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Superfund Federal-Lead Remedial Project Management Handbook (EPA/540/G-87/001, OSWER Directive 9355.1-1), December 1986.
30. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Superfund State-Lead Remedial Project Management Handbook, (EPA/540/G-87/002), December 1986.
31. U.S. Environmental Protection Agency. Office of Research and Development. Hazardous Waste Engineering Research Laboratory. Technology Briefs: Data Requirements for Selecting Remedial Action Technology (EPA/600/2-87/001), January 1987.
32. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Data Quality Objectives for Remedial Response Activities: Development Process (EPA/540/G-87/003), March 1987.
33. "PCB Spill Cleanup Policy" (40 CFR Part 761), Volume 52, Number 63, April 2, 1987.
34. Memorandum from Francis S. Blake, General Counsel, to J. Winston Porter, Assistant Administrator for Solid Waste and Emergency Response, July 31, 1987 (discussing the scope of the CERCLA petroleum exclusion under sections 101 (14) and 104 (a) (2)).
35. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Alternate Concentration Limits Guidance (OSWER Directive 9481.00-6C, EPA/530-SW-87-017), July 1987.
36. U.S. Environmental Protection Agency. Office of Health and Environmental Assessment. A Compendium of Technologies Used in the Treatment of Hazardous Waste (EPA/625/8-87/014), September 1987.
37. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. A Compendium of Superfund Field Operations Methods (EPA/540/P-87/001, OSWER Directive 9355.0-14), December 1987.
38. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Superfund Removal Procedures - Revision Number Three (OSWER Directive 9360.0-03B), February 1988.
39. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Interim Final Guidance on Conducting Remedial Investigations and Feasibility Studies under CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act), October 1988.
40. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Draft Guidance on Remedial Actions for Contaminated Groundwater at Superfund Sites (OSWER Directive 9283.1-2), April 1988.
41. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Community Relations in Superfund: A Handbook (Interim Version) (EPA/HW-6, OSWER Directive 9230.0-3A), June 1988.

42. Memorandum from Mark McClanahan, Agency for Toxic Substances and Disease Registry (ATSDR), U.S. Public Health Service to Joyce Perdek, EPA Office of Research and Development and Joseph Galbraith, EPA Region VII (July 14, 1988). Concerning the Denny Farm incinerator closure plan.
43. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Superfund Removal Program Policy Notebook - Volume 1, October 12, 1988.
44. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Superfund Removal Program Policy Notebook - Volume 2, October 12, 1988.
45. U.S. Environmental Protection Agency. Office of Research and Development. Stabilization/Solidification of CERCLA and RCRA Wastes (EPA/625/6-89/022), May 1989.
46. U.S. Environmental Protection Agency, Region 1. Supplemental Risk Assessment Guidance for the Superfund Program, (EPA 901/5-89-001), June 1989.
47. Agency for Toxic Substances and Disease Registry (ATSDR), U.S. Public Health Service. Toxicological Profile for 2,3,7,8-Tetrachlorodibenzo-p-Dioxin (ATSDR/TP-88/23), June 1989.
48. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Risk Assessment Guidance for Superfund. Human Health Evaluation Manual Part A, July 1989.
49. U.S. Environmental Protection Agency. Risk Reduction Engineering Laboratory. Handbook on In Situ Treatment of Hazardous Waste-Contaminated Soils (EPA/540/2-90/002), January 1990.
50. U.S. Environmental Protection Agency. Office of Research and Development. International Waste Technologies/Geo-Con In Situ Stabilization/Solidification (EPA/540/A5-89/004), August 1990.
51. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Draft - Innovative Treatment Technologies (9380.3-05FS), February 1991.
52. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Draft - Immobilization as Treatment (9380.3-07FS) February 1991.
53. U.S. Environmental Protection Agency. Office of Research and Development. Fate of Polychlorinated Biphenyls (PCBs) in Soil Following Stabilization with Quicklime (EPA/6000/2-91/052), September 1991.
54. Memorandum from Don R. Clay, EPA Headquarters to Regional Administrators, January 9, 1992 (discussing the twenty-third remedy delegation report - FY 1992).
55. Memorandum from Kenneth A. Poirier, Superfund Health Risk Technical Support Center to Sarah Levinson, EPA Region 1, January 23, 1992 (discussing the risk assessment issue paper for polyaromatic hydrocarbons (PAHs)).
56. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Personnel Protection and Safety.

57. Memorandum from Timothy Fields Jr., U.S. Environmental Protection Agency Office of Emergency and Remedial Response to Directors, Waste Management Division, Regions I, IV, V, VII, VIII; Director, Emergency and Remedial Response Division, Region II; Directors, Hazardous Waste Management Division, Regions III, VI, IX; Director, Hazardous Waste Division, Region X; Directors, Environmental Services Divisions, Regions I, VI, VII (OSWER Directive 9200.5-220) (discussing guidance on key terms used in Superfund).