

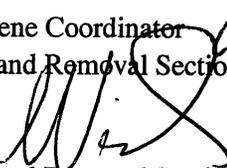


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I

**DATE:** August 23, 2005

**SUBJ:** Site Investigation Closure Memorandum  
Inter Royal Site  
20 Reservoir Street  
Plainfield, Connecticut

**FROM:**  Frank Gardner, On-Scene Coordinator  
Emergency Response and Removal Section II, EPRB, OSRR

**THRU:** Steven Novick, Chief   
Emergency Response and Removal Section II, EPRB, OSRR

**TO:** Inter Royal Site File

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In accordance with section 300.410 of the National Contingency Plan (NCP), a Removal Site Evaluation, consisting of a Preliminary Assessment and Site Investigation (PA/SI), has been undertaken at the Inter Royal Site ("Site") in Plainfield, Connecticut. The findings of the Removal Site Evaluation have been evaluated under the criteria set forth in section 300.415 of the NCP, section 104(a) and (b) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(a) and (b) and Clean Water Act (CWA) § 311(c)(i) as amended by the Oil Pollution Act (OPA) § 4201(a). The Removal Site Evaluation has led to the determination that a Removal Action is appropriate at this time.

The findings of the Removal Site Evaluation are outlined below.

1. Source and nature of the release or threat of release
  - a. The Removal Site Evaluation consisted of the following actions.
    - i. Review of analytical results generated by EPA's New England Regional Laboratory.
    - ii. Emergency response activities conducted by EPA following a fire at the Site on from April 26, 2005 to June 17, 2005.

- b. Based on the information available at this time, the principal hazardous substances or pollutants or contaminants that are being released or for which there is threat of release include but are not necessarily limited to the list below.

Hazardous Substances or  
Pollutants or Contaminants

Media

asbestos

boiler and pipe insulation

lead

ash and surface soils

2. Evaluation of the threat to public health, welfare and the environment

- a. Federal Agency for Toxic Substances and Disease Registry:

Threat \_\_\_\_\_ No Threat \_\_\_\_\_ Evaluation Not Necessary X

- b. Endangerment to the ecosystem:

Threat \_\_\_\_\_ No Threat \_\_\_\_\_ Evaluation Not Necessary X

3. The Removal Site Evaluation was terminated pursuant to section 300.410(f) of the NCP for the following reason(s).

- ( ) There is no release.
- ( ) The source is neither a "vessel" nor a "facility" as defined in section 300.5 of the NCP.
- ( ) The release involves neither a hazardous substance, nor a pollutant or contaminant that may present an imminent and substantial danger to public health or welfare of the United States.
- ( ) It is subject to the limitations on response specified in §300.400(b)(1) through (3). The release is
  - ( ) of a naturally occurring substance in its unaltered form, or altered solely through naturally occurring processes or phenomena, from a location where it is naturally found.
  - ( ) from products that are part of the structure of, and result in exposure within, residential buildings or businesses or community structures.

- into public or private drinking water supplies due to deterioration of the system through ordinary use.
  - The amount, quantity, or concentration released does not warrant a Federal response.
  - A party responsible for the release, or any other person, is providing appropriate response, and on-scene monitoring by EPA is not required.
  - The Removal Site Evaluation is complete.
4. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its completion, and not for other reasons.
- a. The factors listed below, found in Section 300.415(b)(2) of the NCP, are applicable to this Site.
    - Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.
    - Actual or potential contamination of drinking water supplies or sensitive ecosystems.
    - Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.
    - High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.
    - Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
    - Threat of fire or explosion.
    - The availability of other appropriate Federal or State response mechanisms to respond to the release.
    - Other situations or factors that may pose threats to public health or welfare of the United States or the environment.
  - b. The existence of the conditions specified in Section 4.a., above, indicate that a Removal Action under section 300.415 of the NCP is necessary. Friable asbestos in pipe and boiler insulation and lead in ash and surface soils in the area of the fire-damaged, former three-story structure pose a direct contact threat to local residents and those who may enter the Site. Although a perimeter fence is present, the Site has a well-documented history of trespassing and unauthorized access. The fire-damaged ruins of the building may also act as an attractive nuisance, bringing unauthorized individuals in close contact with the hazardous substances present.

- c. In light of the magnitude of the threat or potential threat to health, welfare, or the environment, the appropriate categorization of a Removal Action at this Site is:

Emergency\_\_\_\_ Time-Critical  X  Non Time-Critical\_\_\_\_\_

5. As reflected in Section 3, above, the Removal Site Evaluation was terminated due to its completion, and not for other reasons.

- a. As found in section 300.410(e)(1) of the NCP, the OSC shall determine whether a release governed by CWA section 311(c)(1), as amended by OPA section 4201(a), has occurred.

( ) There is a release, or potential threat of release, as governed by the CWA as amended by OPA.

(X) There is not a release, or potential threat of release, as governed by the CWA as amended by OPA.

- b. The absence of the conditions specified in Section 5.a., above, indicate that an Oil Spill Response under Appendix E to Part 300 of the NCP is **not** necessary. Site conditions do not indicate the threat of discharge of oil to navigable waters.

cc: Steven Novick, Chief, Emergency Response and Removal Section II, OSRR (w/o attachments)  
Meghan Cassidy, Chief, Technical Support & Site Assessment Section, OSRR (w/o attachments)  
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