



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE – SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

MEMORANDUM

DATE: April 12, 2021

SUBJ: Request for a Removal Action at the McGoldrick Paper Company Site,
Hinsdale, New Hampshire - **Action Memorandum**

FROM: Wing Chau, On-Scene Coordinator
Emergency Response and Removal Section II

THRU: William Lovely, Chief
Emergency Response and Removal Section II

Carol Tucker, Chief
Emergency Planning & Response Branch

TO: Karen McGuire, Director
Enforcement and Compliance Assurance Division for
Bryan Olson, Director, Superfund and Emergency Management Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed removal action at the McGoldrick Paper Company Site (the Site), which is located at 54-54A Canal Street in Hinsdale, Cheshire County, New Hampshire. Hazardous substances present in 55-gallon drums, totes, and various containers abandoned at the Site, if not addressed by implementing the response actions selected in this Action Memorandum, will continue to pose a threat to human health and the environment. There are no nationally significant or precedent-setting issues associated with this Site, and there has been no use of the OSC's \$200,000 warrant authority.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID# : NHN000103203
SITE ID# : 01QJ
CATEGORY : Time-Critical

A. Site Description

1. Removal site evaluation

In February 2020, the New Hampshire Department of Environmental Services (NHDES) requested EPA's assistance in evaluating whether current site conditions, including the potential release of hazardous substances stored in 55-gallon drums and 300-gallon totes, located in unsecured buildings, would warrant a time-critical removal action. On August 17-18, 2020, EPA and its Superfund Technical Assessment and Response Team (START) contractor, Weston Solutions, Inc. (Weston), mobilized to the Site to conduct sampling activities as part of a Preliminary Assessment/Site Investigation (PA/SI). The PA/SI sampling event included collection of 30 container samples for lab analyses, including volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), pH (potential of hydrogen), pesticide/polychlorinated biphenyls (PCBs), oil identification, and metals. Twenty surface soil samples were collected for lab analyses, including SVOCs, pesticide/PCBs, and metals (including mercury).

Sampling results identified the presence of VOCs (including toluene, xylenes, acetone, ethylbenzene), SVOCs (including various polyaromatic hydrocarbons [PAHs]), acids, and caustics. The PA/SI confirmed the presence of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) hazardous substances that poses a direct contact threat, as well as a potential for release or further release into the environment. Based upon the PA/SI sampling results, a time-critical removal action was recommended in the Site Investigation Closure Memorandum dated January 12, 2021.

2. Physical location

Located at 54-54A Canal Street, Hinsdale, Cheshire County, New Hampshire, the Site is an approximately 2.52-acre property identified by the Town of Hinsdale Assessor's Office as Lot 47 on Tax Map 47. It is currently developed with commercial/industrial buildings, including a former mill building and attached warehouse, boiler house, former machine/welding shop, and a storage barn/garage. Portions of the boiler house and machine/welding shop have collapsed or are structurally unsound. The Site is bounded to the north by Canal Street (Route 119), and residential property and a commercial property; to the east by Stockwell Brook and residential properties; to the west by residential properties; and to the south by the Ashuelot River.

3. Site characteristics

The Site was utilized for the manufacture of paper products from the mid-1800s until approximately 2004, after which it was occupied by an auto salvage business. There are currently no active business operations at the Site, and the majority of the buildings is in a state of

disrepair. The Town of Hinsdale acquired the property by Tax Deed in December of 2019. Based on the Cheshire County, New Hampshire National Flood Insurance Program Map (Community Panel Number 33005C0386E), the Site is located within a 100-year floodplain, in association with both the abutting Ashuelot River and Stockwell Brook.

The mill building is a brick structure with a concrete foundation and a wood-framed flat roofing system, observed to be single story from the Canal Street entrance; however, a lower level is sub-grade on the northern portion of the structure, and at-grade on the southern side due to the southerly downward slope of the Site towards the abutting river. The boiler house is brick and masonry with a concrete slab foundation and attached chimney. The warehouse is a single-story wood-framed structure abutting the northerly side of the mill building. The former machine/welding shop site building is primarily single story, the exception being a half-story attic space over the western end of the shop. The storage barn/garage is located along the easterly Site boundary, north of the machine/welding shop building, and is a one- and a half-story wood-framed structure with a pitched roof, with a one-story concrete block addition located off the southern end. A concrete pad is also located north of the boiler house, and until its closure/removal in 2010, was the location of a 10,000-gallon aboveground storage tank (AST) that was located within a concrete secondary containment. The AST is believed to have contained No. 4 oil, but has been variously reported as containing No. 2, 4, or 6 oil.

Access to the Site and onsite buildings is unrestricted. Evidence of trespassing include the presence of empty beverage containers. There are residential properties located within 100 feet of the Site, and, according to 2010 Census data, 1,014 people live within one mile.

Based on information in EPA's EJSCREEN environmental justice screening tool, 0 out of 11 Environmental Justice Indexes for the area within a one-mile radius of the Site exceed the 80th percentile on a national basis. Please see the attached EJSCREEN standard report for more information.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

The PA/SI sampling event documented the presence of hazardous substances at the Site that pose a threat of release into the environment. Hazardous substances, including VOCs, SVOCs, acids, and caustics, are present in various storage containers, including 55-gallon drums and intermediate bulk containers (IBCs)/polyethylene totes (totes), abandoned in the buildings at the McGoldrick Paper Company Site. With access into the buildings unrestricted and evidence that trespassing is occurring, the potential for a contract threat/exposure and release to the environment increases significantly with illegal tampering of these containers. In addition, the property is located within a 100-year floodplain. If a release of hazardous substances occurs, a flooding event could cause the migration of hazardous substances towards the Ashuelot River,

which flows along the southern side of the property. Some of the higher concentrations of VOCs and SVOCs detected in the containers are listed in the table below.

Sample Location	T-5	T-6	T-7	D-9	D-12	D-13
Compound	(ug/Kg)	(ug/Kg)	(ug/Kg)	(ug/Kg)	(ug/Kg)	(ug/Kg)
VOCs						
Acetone	ND	ND	260,000	ND	24,000	420,000
Benzene	640,000	ND	84,000	11,000	ND	470,000
Ethylbenzene	1,900,000	74,000	970,000	150,000	ND	3,000,000
Methylene chloride	38,000	1,900	15,000	ND	ND	48,000
Toluene	8,500,000	26,000	3,600,000	240,000	ND	9,400,000
Xylenes, total	9,900,000	540,000	5,400,000	860,000	100	17,000,000
SVOCs						
Acenaphthene	190,000	220,000	ND	ND	18,000	ND
Benzo[a]anthracene	57,000	68,000	ND	27,000	9,400	ND
Benzo[a]pyrene	26,000	31,000	ND	18,000	5,600	11,000
Benzo[b]fluoranthene	13,000	14,000	ND	18,000	ND	ND
Benzo[g,h,i]perylene	ND	ND	ND	24,000	ND	ND
Chrysene	59,000	81,000	ND	19,000	ND	ND
Fluorene	200,000	260,000	47,000	14,000	36,000	18,000
Naphthalene	850,000	830,000	430,000	210,000	120,000	300,000
Phenanthrene	590,000	730,000	140,000	58,000	55,000	38,000
Pyrene	160,000	210,000	54,000	61,000	21,000	27,000

ND – Non Detect

The VOCs and SVOCs identified in the table above, as well as other VOCs, SVOCs, and metals identified in the PA/SI report, are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. 9601 (14).

In addition, 40 CFR section 261.22 defines corrosive wastes with pH less than or equal to 2, or greater than or equal to 12.5 as hazardous due to its corrosivity characteristics. The table below identifies the containers that were sampled during the PA/SI that have corrosive wastes.

Sample Location	D-03	D-19	D-22
Analytical Result - pH	12.6	13.5	0.1

5. NPL status

The Site is not currently on the National Priorities List and has not received a Hazardous Ranking System rating.

6. Maps, pictures and other graphic representations

Below are a few photos depicting current site conditions.





B. Other Actions to Date

1. Previous actions

In April 2018, Ransom Consulting, Inc. (Ransom) completed a Phase I Environmental Site Assessment (ESA) on behalf of the Southwest Regional Planning Commission (SWRPC). During a Site Reconnaissance, Ransom observed multiple containers of suspected oil and/or hazardous materials (OHM) within the Site buildings. Ransom documented approximately 73 drums, including 53 55-gallon drums, 11 30-gallon drums, and nine 20-gallon drums. In addition, Ransom observed seven 300-gallon totes within the Site buildings. In December 2019, Ransom completed a Phase II ESA. Sampling conducted as part of the Phase II investigation confirmed the presence of polycyclic aromatic hydrocarbons (PAHs) and metals (arsenic and antimony) in exceedance of NH soil remediation standards.

2. Current actions

The ESAs mentioned previously were funded through EPA Brownfields grants to SWRPC. EPRB will coordinate response actions with the EPA Brownfields Program to ensure consistency between the brownfields and removal programs. Currently, no response actions have been taken to address the potential threat of release of hazardous substances.

C. State and Local Authorities' Roles

1. State and local actions to date

In February 2020, NHDES contacted EPA to seek assistance from EPRB on evaluating this Site for a potential removal action. On June 9, 2020, NHDES sent EPA a letter further documenting its request for EPA assistance.

2. Potential for continued State/local response

EPA will continue coordinating with NHDES and will seek NHDES' technical support during the removal action as needed.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

As described below, the conditions at the Site meet the general criteria for a removal action, as set forth in 40 C.F.R. §300.415(b)(1), in that “there is a threat to public health or welfare of the

United States or the environment,” and in consideration of the factors set forth in 40 C.F.R. §300.415(b)(2) as described below.

The following substances are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. 9601 (14):

- Acetone;
- Benzene;
- Ethylbenzene;
- Methylene chloride;
- Toluene;
- Xylenes;
- Acenaphthene;
- Benzo[a]anthracene;
- Benzo[b]fluoranthene;
- Benzo[g,h,i]perylene;
- Chrysene;
- Fluorene;
- Naphthalene;
- Phenanthrene; and
- Pyrene.

The following information is from ToxFAQs which are summaries about hazardous substances and their health effects. ToxFAQs are published by the Agency of Toxic Substances and Disease Registry (ATSDR):

ToxFAQ for Acetone, September 1995:

Breathing moderate- to-high levels of acetone for short periods of time, however, can cause nose, throat, lung, and eye irritation; headaches; light-headedness; confusion; increased pulse rate; effects on blood; nausea; vomiting; unconsciousness and possibly coma; and shortening of the menstrual cycle in women. Swallowing very high levels of acetone can result in unconsciousness and damage to the skin in your mouth. Skin contact can result in irritation and damage to your skin.

ToxFAQ for Benzene, August 2007:

Breathing benzene can cause drowsiness, dizziness, and unconsciousness; long-term benzene exposure causes effects on the bone marrow and can cause anemia and leukemia.

ToxFAQ for Ethylbenzene, September 2007:

Exposure to high levels of ethylbenzene in air for short periods can cause eye and throat irritation. Exposure to higher levels can result in dizziness.

ToxFAQ for Methylene chloride, February 2001:

If you breathe in large amounts of methylene chloride you may feel unsteady, dizzy, and have nausea and a tingling or numbness of your finger and toes. A person breathing smaller amounts of methylene chloride may become less attentive and less accurate in tasks requiring hand-eye coordination. Skin contact with methylene chloride causes burning and redness of the skin.

ToxFAQ for Toluene, September 2015:

Toluene may affect the nervous system. Low to moderate levels can cause tiredness, confusion, weakness, drunken-type actions, memory loss, nausea, and loss of appetite. These symptoms usually disappear when exposure stops. Long-term daily inhalation exposure to toluene in the workplace may cause some hearing and color vision loss. Repeatedly breathing toluene from glue or paint thinners may permanently damage the brain.

ToxFAQ for Xylenes, August 2007:

High levels of exposure for short or long periods can cause headaches, lack of muscle coordination, dizziness, confusion, and changes in one's sense of balance. Exposure of people to high levels of xylene for short periods can also cause irritation of the skin, eyes, nose, and throat; difficulty in breathing; problems with the lungs; delayed reaction time; memory difficulties; stomach discomfort; and possibly changes in the liver and kidneys. It can cause unconsciousness and even death at very high levels.

ToxFAQ for PAHs, September 1996:

PAHs are a group of over 100 different chemicals that are formed during the incomplete burning of coal, oil and gas, garbage, or other organic substances like tobacco or charbroiled meat. Acenaphthene, Benzo[a]anthracene, Benzo[b]fluoranthene, Benzo[g,h,i]perylene, Chrysene, Fluorene, Phenanthrene, and Pyrene are PAHs.

The Department of Health and Human Services has determined that some PAHs may reasonably be expected to be carcinogens. Some people who have breathed or touched mixtures of PAHs and other chemicals for long periods of time have developed cancer. Some PAHs have caused cancer in laboratory animals when they breathed air containing them (lung cancer), ingested them in food (stomach cancer), or had them applied to their skin (skin cancer).

ToxFAQ for Naphthalene, August 2005:

Exposure to large amounts of naphthalene may damage or destroy some of your red blood cells. This could cause you to have too few red blood cells until your body replaces the destroyed cells. This condition is called hemolytic anemia. Some symptoms of hemolytic anemia are fatigue, lack of appetite, restlessness, and pale skin. Exposure to large amounts of naphthalene may also cause nausea, vomiting, diarrhea, blood in the urine, and a yellow color to the skin.

There are approximately one hundred drums of various sizes and approximately twenty 300-gallon totes, which contain various waste-streams with hazardous substances, being improperly stored and abandoned in the unsecured buildings. In addition, some of these drums contain highly corrosive liquids.

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants; [§300.415(b)(2)(i)];

Access to the Site is unrestricted. Evidence of trespassing include empty beverage containers. Potential exposure could possibly occur if trespassers tamper with the abandoned containers with hazardous materials. In addition, residential properties abut the Site. A potential release of these hazardous substances could possibly impact nearby residents.

Actual or potential contamination of drinking water supplies or sensitive ecosystems [§300.415(b)(2)(ii)];

The property is located within a 100-year floodplain. If a release of hazardous substances occurs, a flooding event could cause the migration of hazardous substances towards the Ashuelot River, which flows along the southern side of the property.

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release [§300.415(b)(2)(iii)];

The PA/SI documented the presence of VOCs, SVOCs, and corrosive materials stored in approximately one hundred drums and approximately twenty 300-gallon totes.

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)];

The buildings are open and exposed to the environment. The abandoned containers are exposed temperature extremes of the seasons. The freeze and thaw cycles can adversely impact the structural integrity of the storage containers; thus, increasing the potential for release.

Threat of fire or explosion [§300.415(b)(2)(vi)];

There is no fire suppression system in the Site buildings. There is evidence of unauthorized access into the buildings. Should a fire occur resulting from the illegal trespassing, a release of hazardous substances could occur from the abandoned containers.

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)];

There are no other appropriate Federal or State response mechanisms available. NHDES requested EPA's assistance to address the release and/or potential for release.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment. In accordance with OSWER Directive 9360.0-34 (August 19, 1993), an endangerment determination is made based on "appropriate Superfund policy or guidance, or on collaboration with a trained risk assessor," which is outlined and discussed in Section III above. "Appropriate sources include, but are not limited to, relevant action level or clean-up standards, Agency for Toxic Substances and Disease Registry (ATSDR) documents or personnel, or staff toxicologists."

EPA relied on the health and toxicological information from ATSDR's toxicological profiles for the CERCLA hazardous substances identified in Section III above. EPA also classified some of the wastes stored in the 55-gallon drums as hazardous wastes due to its corrosive characteristics pursuant to 40 CFR section 261.22.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The actions required to mitigate the threats outlined herein, are given below. The proposed actions will protect public health, welfare, and the environment by removing the hazardous substances from accessible areas of the Site. It is expected that specific removal activities will include, but are not limited to, the following:

- Conducting a site walk with the cleanup contractor;
- Developing a site-specific Health and Safety Plan (HASP);
- Mobilizing of personnel and equipment to the Site;
- Collecting samples for analysis as needed to develop waste profiles;
- Conducting hazard categorization, bulking activities, and over-packing activities for the hazardous materials stored in the 55-gallon drums, totes, and other containers as needed;
- Ensuring waste-streams are in appropriate shipping containers, and preparing for off-site disposal;

- Arranging for transportation and disposal of hazardous substances to EPA- approved off-site disposal facilities; and
- Repairing response-related damages, if necessary.

2. Community relations

EPA will remain involved with the local community during the course of the removal action through press releases, fact sheets, and public meetings, as necessary. The OSC will receive assistance from the EPA Community Involvement Coordinator to assist with all public relations activities. EPA also will work closely with the state and town officials to keep them informed about the removal action.

3. Contribution to remedial performance

The cleanup proposed in this Action Memorandum is designed to mitigate the threats to human health and the environment posed by the Site. The actions taken at the Site would be consistent with and will not impede any future responses.

4. Description of innovative technologies and sustainable approaches

In accordance with the December 23, 2013 Memorandum, updated August 02, 2016, issued by Office of Land and Emergency Management as well as the Region 1 Clean and Greener Policy for Contaminated Sites, greener cleanup practices should be considered for all cleanup projects. Greener cleanup is the practice of incorporating practices that minimize the environmental impacts of cleanup actions and maximize environmental and human benefit. Alternative technologies and sustainable approaches will be considered and incorporated, as appropriate, throughout the implementation of the removal action.

5. Applicable or relevant and appropriate requirements (ARARs)

Federal ARARs:

Clean Water Act, National Pollutant Discharge Elimination System (NPDES), 40 C.F.R. Parts 122 – 125; 122.26: Establishes the specifications for discharging pollutants from any point source into the waters of the U.S. Also, includes storm water standards for construction sites over one acre. Removal activities will be managed to prevent stormwater discharge from the Site.

Clean Water Act, 40 CFR Sections 122.26(c)(ii)(C) and 122.44(k): NPDES regulations for storm water control and management.

Clean Air Act, 40 CFR Part 61, 42 U.S.C. Section 112(b)(1): standards for controlling dust. The regulations establish emissions standards for 189 hazardous air pollutants. Standards set for dust and release sources. If the removal of contaminated soils generates regulated air pollutants, then measures will be implemented to meet these standards.

Clean Water Act Section 404(b), (40 C.F.R. Parts 230 and 231, 33 C.F.R. Parts 320-323, and 33 C.F.R. Part 332): No activity that adversely affects a wetland shall be permitted if a practicable alternative with lesser impacts is available. Controls discharge of dredged or fill material to protect aquatic ecosystems. Any wetlands altered by the cleanup will be restored as required by regulatory standards.

Clean Water Act Federal Water Quality Criteria, Section 304(a), 40 C.F.R. 131.11: National Recommended Water Quality Criteria for chemicals for both the protection of human health and the protection of aquatic life; to be used as water quality monitoring standards for any work in or adjacent to wetlands or water bodies.

Floodplain Management and Protection of Wetlands, (44 C.F.R. Part 9): Regulations that set forth the policy, procedure and responsibilities to implement and enforce Executive Order 11988 (Floodplain Management) and Executive Order 11990 (Protection of Wetlands). Prohibits activities that adversely affect a federally-regulated wetland unless there is no practicable alternative and the proposed action includes all practicable measures to minimize harm to wetlands that may result from such use. Requires the avoidance of impacts associated with the occupancy and modification of federally-designated 100-year and 500-year floodplain.

Fish and Wildlife Coordination (50 C.F.R. Part 297; 16 U.S.C. Section 661 et seq.): Any modification of a body of water requires consultation with the U.S. Fish and Wildlife Services and the appropriate state wildlife agency to develop measures to prevent, mitigate or compensate for losses of fish and wildlife. This requirement is addressed under CWA Section 404 requirements.

State ARARs:

40 C.F.R. Parts 260-262 and 264 Resource Conservation and Recovery Act, Subtitle C-Hazardous Waste Identification and Listing Regulations; Generator and Handler Requirements, Closure and Post-Closure – New Hampshire has been delegated the authority to administer these RCRA standards through its state hazardous waste management regulations. Waste generated will be tested to determine whether it exceeds hazardous waste thresholds and, if so, the hazardous waste will be managed on-site and until such time as it is shipped to an EPA-approved off-site disposal location.

The OSC will coordinate with State officials to identify additional State ARARs, if any. In accordance with the National Contingency Plan and EPA Guidance Documents, the OSC will determine the applicability and practicability of complying with each ARAR that is identified in a timely manner.

6. Project schedule

The project is estimated to begin after the Action Memorandum is signed, likely by late April or early May 2021 when weather conditions are more suitable. It is estimated to be completed within six months.

B. Estimated Costs

COST CATEGORY		CEILING
<i>REGIONAL REMOVAL ALLOWANCE COSTS:</i>		
ERRS Contractor		\$175,000.00
Interagency Agreement		\$ 0.00
<i>OTHER EXTRAMURAL COSTS NOT FUNDED FROM THE REGIONAL ALLOWANCE:</i>		
START Contractor		\$150,000.00
Extramural Subtotal		\$325,000.00
Extramural Contingency	10%	\$32,500.00
TOTAL, REMOVAL ACTION CEILING		\$357,500.00

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action will increase public health risks due to the potential contact threat posed by the release and/or threat of release of CERCLA hazardous substances at and from the Site. The absence of a removal action described herein will cause conditions to remain unaddressed, and threats associated with the presence of hazardous substances at the Site will continue to pose a threat to human health and the environment.

VII. OUTSTANDING POLICY ISSUES

There are no precedent-setting policy issues associated with this Site.

VIII. ENFORCEMENT ... For Internal Distribution Only

See attached Confidential Enforcement Strategy.

The total EPA costs for this removal action that will be eligible for cost recovery are estimated to be \$357,500 (extramural costs) + \$150,000 (EPA intramural costs) = \$507,500 X 1.4053 (regional indirect rate) = **\$713,189.75**¹.

IX. RECOMMENDATION

This decision document represents the selected removal action for the McGoldrick Paper Company Site in Hinsdale, NH, developed in accordance with CERCLA, as amended, and is not inconsistent with the National Contingency Plan. The basis for this decision will be documented in the administrative record to be established for the Site.

Conditions at the Site meet the NCP Section 300.415 (b) (2) criteria for a removal action due to the following:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [§300.415(b)(2)(i)];

Actual or potential contamination of drinking water supplies or sensitive ecosystems [§300.415(b)(2)(ii)];

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release [§300.415(b)(2)(iii)];

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)];

Threat of fire or explosion [§300.415(b)(2)(vi)];

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)].

¹Direct Costs include direct extramural costs \$357,500 and direct intramural costs \$150,000. Indirect costs are calculated by using regional indirect rate in effect at time cost estimate is prepared and is expressed as a percentage of the direct costs 40.53% x \$507,500, consistent with EPA's full cost accounting methodology effective October 01, 2018. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

I recommend that you approve the proposed removal action. The total extramural removal action project ceiling if approved will be \$357,500.

APPROVAL: _____

DATE: _____

DISAPPROVAL: _____

DATE: _____

Attachment 1 – EJSCREEN Report

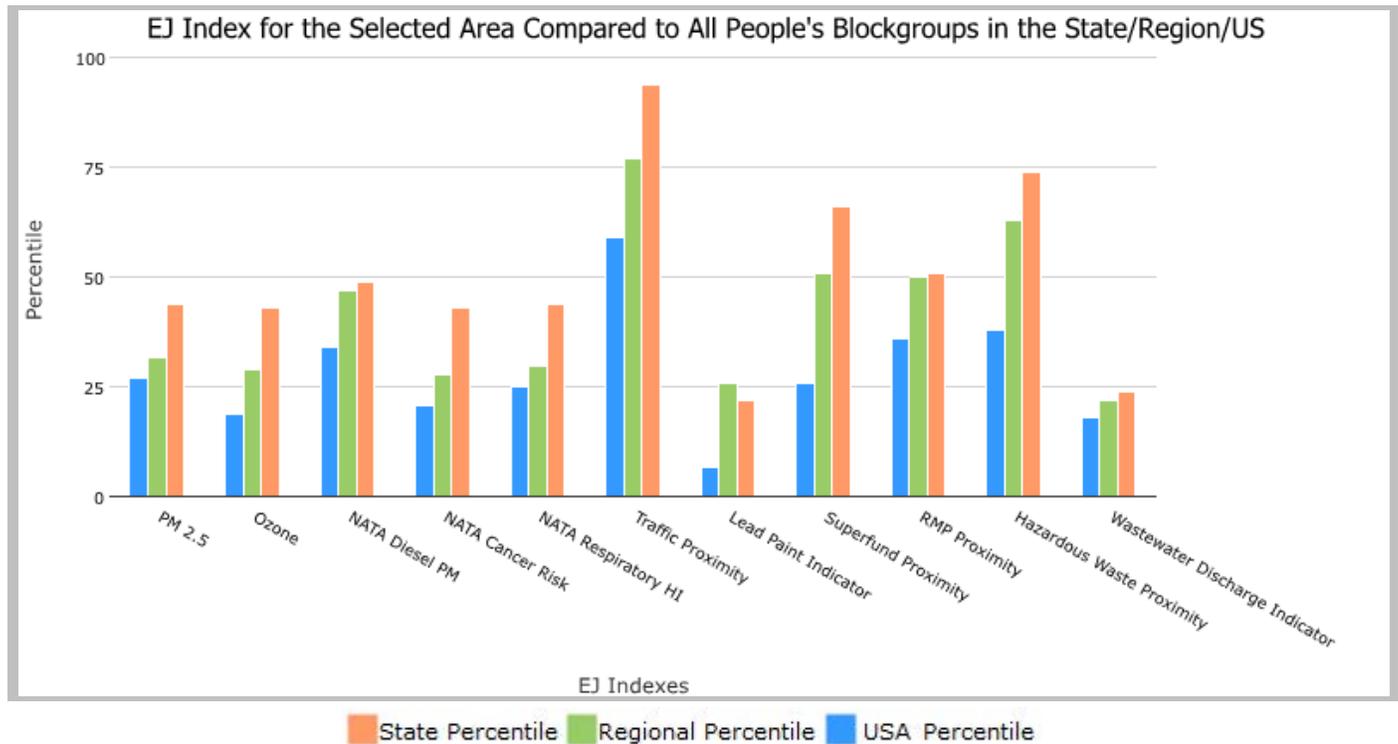
1 mile Ring Centered at 42.787819,-72.474747, NEW HAMPSHIRE, EPA Region 1

Approximate Population: 955

Input Area (sq. miles): 3.14

McGoldrick Paper Company Site

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	44	32	27
EJ Index for Ozone	43	29	19
EJ Index for NATA* Diesel PM	49	47	34
EJ Index for NATA* Air Toxics Cancer Risk	43	28	21
EJ Index for NATA* Respiratory Hazard Index	44	30	25
EJ Index for Traffic Proximity and Volume	94	77	59
EJ Index for Lead Paint Indicator	22	26	7
EJ Index for Superfund Proximity	66	51	26
EJ Index for RMP Proximity	51	50	36
EJ Index for Hazardous Waste Proximity	74	63	38
EJ Index for Wastewater Discharge Indicator	24	22	18



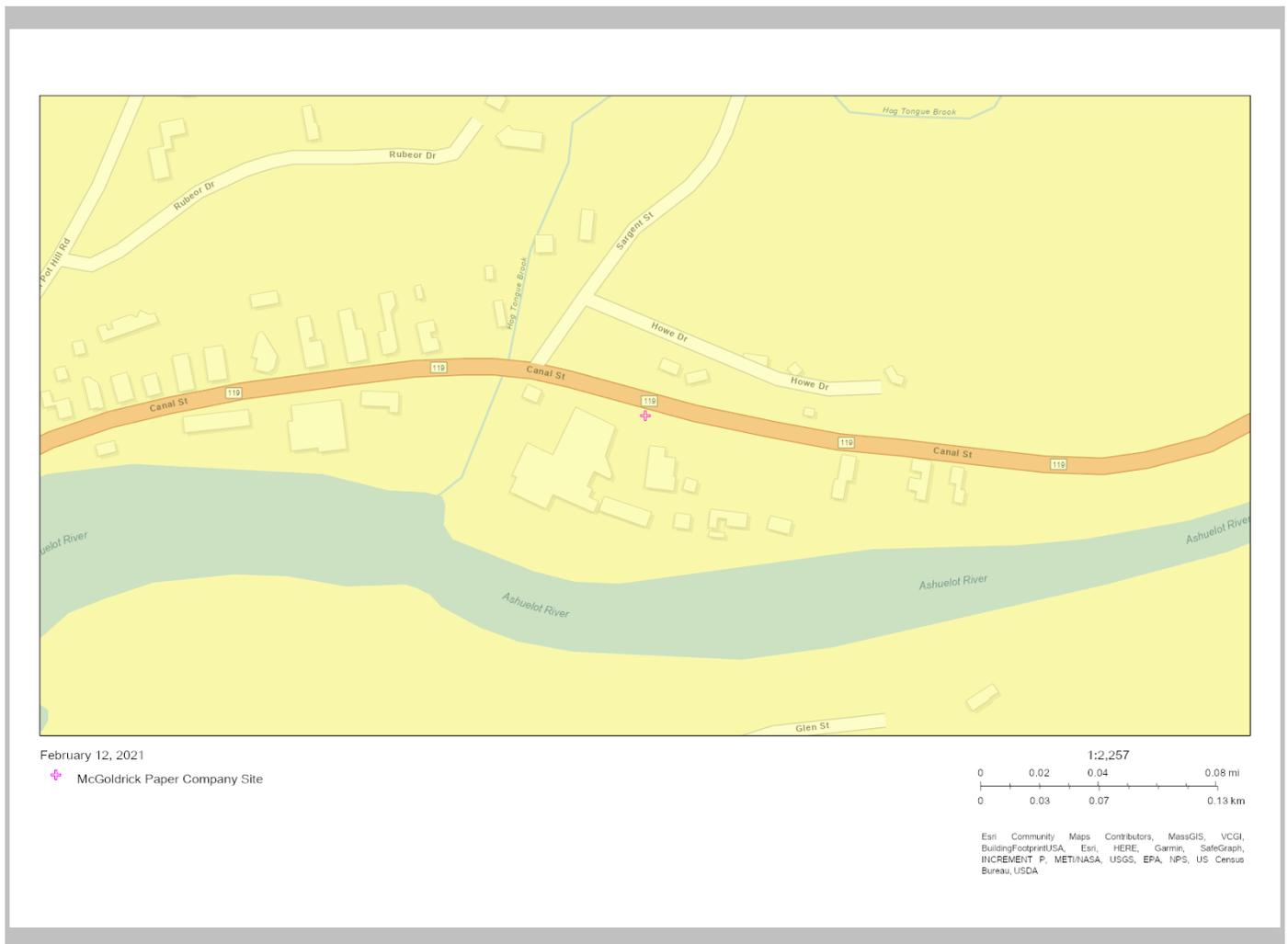
This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

1 mile Ring Centered at 42.787819,-72.474747, NEW HAMPSHIRE, EPA Region 1

Approximate Population: 955

Input Area (sq. miles): 3.14

McGoldrick Paper Company Site



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJSCREEN Report (Version 2020)



1 mile Ring Centered at 42.787819,-72.474747, NEW HAMPSHIRE, EPA Region 1

Approximate Population: 955

Input Area (sq. miles): 3.14

McGoldrick Paper Company Site

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	5.37	5.3	55	6.14	9	8.55	1
Ozone (ppb)	37.2	36.8	45	39.5	17	42.9	17
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.154	0.204	38	0.345	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	23	23	50	25	<50th	32	<50th
NATA* Respiratory Hazard Index	0.27	0.28	45	0.31	<50th	0.44	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	0	400	10	930	4	750	4
Lead Paint Indicator (% Pre-1960 Housing)	0.41	0.31	72	0.44	49	0.28	71
Superfund Proximity (site count/km distance)	0.04	0.18	22	0.15	11	0.13	35
RMP Proximity (facility count/km distance)	0.092	0.24	43	0.58	19	0.74	13
Hazardous Waste Proximity (facility count/km distance)	0.14	1.9	22	4.1	11	5	19
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.00083	0.24	69	0.7	62	9.4	65
Demographic Indicators							
Demographic Index	14%	15%	59	24%	39	36%	17
People of Color Population	0%	10%	6	24%	3	39%	1
Low Income Population	28%	20%	74	24%	66	33%	49
Linguistically Isolated Population	1%	1%	73	5%	48	4%	47
Population With Less Than High School Education	12%	7%	83	9%	73	13%	60
Population Under 5 years of age	6%	5%	75	5%	69	6%	57
Population over 64 years of age	21%	17%	71	17%	74	15%	79

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.