Superfund Records Center
SITE: Nyanza
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# Nyanza Chemical Waste Dump (Operable Unit III)

## Superfund Site Administrative Record

## Index

Compiled: May 22, 1992
Updated: December 31, 1992
ROD Signed: March 30, 1993

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 March 30, 1993 Record of Decision (ROD) Administrative Record for the Nyanza Chemical Waste Dump (Operable Unit III) Superfund 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. *Although not expressly listed in this index, all documents included in the September 4, 1985 Record of Decision Administrative Record (Operable Unit I) and the September 23, 1991 Record of Decision Administrative Record (Operable Unit II) are incorporated by reference herein, and are expressly made a part of the Administrative Record for the present Operable Unit.* The September 4, 1985 Record of Decision Administrative Record (Operable Unit I) and the September 23, 1991 Record of Decision Administrative Record (Operable Unit II) are available for public review at EPA Region I's Office in Boston, Massachusetts and at the Ashland Public Library, 66 Front Street, Ashland, Massachusetts, 01721. In addition, this index contains documents that are available only for judicial review.

The Administrative Record for Operable Unit III is available for public review at EPA Region I's Records Center in Boston, Massachusetts, the Ashland Public Library, 66 Front Street, Ashland, Massachusetts, 01721, the Framingham Public Library, 49 Lexington Street, Framingham, Massachusetts, 01701, the Wayland Public Library, 5 Concord Road, Wayland, Massachusetts, 01778, the Goodnow Public Library, 21 Concord Road, Sudbury, Massachusetts, 01776, the Lincoln Public Library, Bedford Road, Lincoln, Massachusetts, 01773, and at the Concord Free Public Library, Environmental Resource Center, 129 Main Street, Concord, Massachusetts, 01742. 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

# Nyanza Chemical Waste Dump Superfund Site
# (Operable Unit III)
# Administrative Record

## ROD Signed: March 30, 1993

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## for the

## Nyanza Chemical Waste Dump Superfund Site

## (Operable Unit III)

## (ROD Signed: March 30, 1993)

2.0 Removal Response

2.1 Correspondence

1. Letter from Jay Naparstek, Commonwealth of Massachusetts Department of Environmental Protection to Richard Cavagnero, EPA Region I (November 5, 1991) with the attached Letter from Ngozi T. Oleru, Commonwealth of Massachusetts Department of Public Health to Madeline Snow, Commonwealth of Massachusetts Department of Environmental Protection. Concerning a request for EPA to post warning signs along the banks of the Sudbury River.
2. Letter from Charla Reinganum, Commonwealth of Massachusetts Department of Environmental Protection to Richard A. Haworth, EPA Region I (May 8, 1992). Concerning Commonwealth of Massachusetts Department of Environmental Protection's permission to remove any fish consumption warning signs along the banks of the Sudbury River.

2.9 Action Memoranda

*The Enforcement section of the Memorandum cited below as entry number 1 is withheld as CONFIDENTIAL and is available only for judicial review.*

1. Memorandum from Richard A. Haworth, EPA Region I to Julie Belaga, EPA Region I (April 28, 1992) with the attached "Warning - Sudbury River Fish Contaminated With Mercury." Concerning a request for funding to continue removal actions at the site.

3.0 Remedial Investigation (RI)

3.1 Correspondence

1. Letter from William G. Murray, NUS Corporation to David O. Lederer, EPA Region I (September 5, 1989). Concerning August 11, 1989 meeting with Massachusetts Division of Water Pollution Control and revisions to Water Quality Sampling Program.
2. Letter from Walter J. Martin, NUS Corporation to Ben Montenegro, Town of Ashland Highway Department (August 16, 1990). Concerning the Chemical Brook Culvert Inspection with attached map.
3. Memorandum from Pamela J. Shields, EPA Region I to Chuck Martin, NUS Corporation (January 22, 1992). Concerning site specific contaminants.

3.2 Sampling and Analysis Data

1. "Final Sampling and Analysis Plan - Remedial Investigation/Feasibility Study," NUS Corporation (April 1990).

*Maps associated with documents numbered 2 and 3 may be reviewed, by appointment only, at the EPA Region I Records Center in Boston, Massachusetts.*

2. "Final Sampling and Analysis Plan Amendment No. 2 - Remedial Investigation/Feasibility Study," NUS Corporation (October 1990).
3. "Final Sampling and Analysis Plan Amendment No. 3 - Remedial Investigation/Feasibility Study," NUS Corporation (June 1991).

*Additional Sampling and Analysis Data may be reviewed, by appointment only, at the EPA Region I Records Center in Boston, Massachusetts.*

3.4 Interim Deliverables

1. "Technical Directive Memorandum Appendices for Phase I Activities," NUS Corporation (March 1990).

*Maps associated with document number 2 may be reviewed, by appointment only, at the EPA Region I Records Center in Boston, Massachusetts.*

2. "Final Technical Directive Memorandum for Phase I Activities," NUS Corporation (July 1990).

*The videotape cited as document number 3 may be reviewed, by appointment only, at the EPA Region I Records Center in Boston, Massachusetts.*

3. "Chemical Brook Video Inspection," NUS Corporation (January 1991).

3.6 Remedial Investigation (RI) Reports

1. "Final Remedial Investigation Report - Volume I," NUS Corporation (May 1992).
2. "Final Remedial Investigation Report - Volume II," NUS Corporation (May 1992).
3. "Final Remedial Investigation Report - Volume III," NUS Corporation (May 1992).

*The document cited as number 4 is oversized and may be reviewed, by appointment only, at the EPA Region I Records Center in Boston, Massachusetts.*

4. "Final Remedial Investigation Report - Volume IV," NUS Corporation (May 1992).

Comments

5. Comments Dated September 11, 1992 from Edward J. Morrier, Framingham Advocates for the Sudbury River on the May 1992 "Final Remedial Investigation Report," NUS Corporation with the attached "Technical Advisor's Review of NUS' May 1992 Final Remedial Investigation Report," Fugro & McClelland.

3.7 Work Plans and Progress Reports

Reports

1. "Commonwealth of Massachusetts Department of Environmental Quality Engineering Work Order" (June 2, 1989).
2. "Final Work Plan Remedial Investigation/Feasibility Study Nyanza Operable Unit III - Sudbury River Study - Volume I," NUS Corporation (August 1989).
3. "Final Work Plan Remedial Investigation/Feasibility Study Nyanza Operable Unit III - Sudbury River Study - Volume II," NUS Corporation (August 1989).
4. "Final Work Plan Amendment No. 2 - Remedial Investigation/Feasibility Study," NUS Corporation (October 1990).
5. "Final Work Plan Amendment No. 3 - Remedial Investigation/Feasibility Study," NUS Corporation (June 1991).
6. "Technical Memorandum Amendment No. 4 - Remedial Investigation/ Feasibility Study," October 1991.
7. "Draft Work Plan Amendment No. 5 - Remedial Investigation/Feasibility Study," NUS Corporation (April 1992).
8. "Draft Work Plan Amendment No. 6," Halliburton NUS (August 1992).
9. "Draft Work Plan Amendment No. 7," Halliburton NUS (December 1992).

Comments

10. Comments Dated August 17, 1992 from Pamela Shields, EPA Region I on the August 1992 "Draft Work Plan Amendment No. 6," Halliburton NUS.

4.0 Feasibility Study (FS)

4.1 Correspondence

1. Memorandum from Susan Svirsky, EPA Region I to Ken Carr and Steve Mierzykowski, United States Department of the Interior, Fish and Wildlife Service (May 21, 1992). Concerning a summary of outstanding issues at the site.
2. Letter from Kenneth Finkelstein, U.S. Department of Commerce, National Oceanic and Atmospheric Administration (NOAA) to Pamela Shields, EPA Region I (December 24, 1992). Concerning NOAA's comments on the draft Proposed Plan for the site.
3. Letter from Merrill S. Hohman, EPA Region I to Matthew Cardillo, B & M Fuel Supply Company (December 31, 1992). Concerning transmittal of the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I and notification that B & M Fuel Supply Company may be potentially interested in the site cleanup.
4. Letter from Merrill S. Hohman, EPA Region I to Barbara U. Gravely, E.I. DuPont de Nemours and Co., Inc. (December 31, 1992). Concerning transmittal of the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I and notification that E.I. DuPont de Nemours and Co., Inc. may be potentially interested in the site cleanup.

4.1 Correspondence (cont'd.)

5. Letter from Merrill S. Hohman, EPA Region I to Peter O. Broussard, Hoechst Celanese Corporation (December 31, 1992). Concerning transmittal of the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I and notification that Hoechst Celanese Corporation may be potentially interested in the site cleanup.
6. Letter from Merrill S. Hohman, EPA Region I to Christopher E. Strapp, The Travelers Company (December 31, 1992). Concerning transmittal of the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I and notification that The Travelers Company may be potentially interested in the site cleanup.
7. Letter from Merrill S. Hohman, EPA Region I to Christopher J. Eskeland, Crum & Forster Corporation (December 31, 1992). Concerning transmittal of the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I and notification that Crum & Forster Corporation may be potentially interested in the site cleanup.
8. Letter from Merrill S. Hohman, EPA Region I to Harvey G. Lewis, Commercial Union Insurance Company (December 31, 1992). Concerning transmittal of the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I and notification that Commercial Union Insurance Company may be potentially interested in the site cleanup.
9. Letter from Merrill S. Hohman, EPA Region I to American Policyholders Insurance Co., Inc. (December 31, 1992). Concerning transmittal of the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I and notification that American Policyholders Insurance Co., Inc. may be potentially interested in the site cleanup.
10. Letter from Merrill S. Hohman, EPA Region I to John A. Postizzi, Middlesex Screw Company, Inc. (December 31, 1992). Concerning transmittal of the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I and notification that Middlesex Screw Company, Inc. may be potentially interested in the site cleanup.
11. Letter from Richard Cavagnero, EPA Region I to Suzanne Condon, Commonwealth of Massachusetts department of Public Health (January 5, 1993). Concerning an update on site activities.
12. Memorandum from Susan Svirsky, EPA Region I to File (January 11, 1993). Concerning ecological remediation goals at the site.

4.5 Applicable or Relevant and Appropriate Requirements (ARARs)

1. Letter from Jay Naparstek, Commonwealth of Massachusetts Department of Environmental Protection to Pamela Shields, EPA Region I (November 3, 1992). Concerning identification of Applicable or Relevant and Appropriate Requirements (ARARs).

4.5 Applicable or Relevant and Appropriate Requirements (ARARs) (cont'd.)

2. Letter from Richard Cavagnero, EPA Region I to Jay Naparstek, Commonwealth of Massachusetts Department of Environmental Protection (December 23, 1992). Concerning EPA's response to the November 3, 1992 letter regarding Applicable or Relevant and Appropriate Requirements (ARARs) and the following attachments:
   A. Letter from William Walsh-Rogalski, EPA Region I to Ann Bingham, Commonwealth of Massachusetts Department of Environmental Quality Engineering (August 18, 1988).
   B. Letter from William Walsh-Rogalski, EPA Region I to Thomas Powers, Commonwealth of Massachusetts Department of Environmental Quality Engineering (July 14, 1987).

4.6 Feasibility Study (FS) Reports

Reports

1. "Draft Final Feasibility Study Report - Revision 3 - Volume I of II," Halliburton NUS (December 1992).

*The maps associated with the record cited below as entry number 2 are oversized and are available for review, by appointment only, at the EPA Region I Records Center in Boston, Massachusetts.*

2. "Draft Final Feasibility Study Report - Revision 3 - Appendices A Through D - Volume II of II," Halliburton NUS (December 1992).
3. "Draft Final Feasibility Study Report - Revision 3 - Addendum 1," Halliburton NUS (December 1992).

Comments

4. Comments Dated March 9, 1993 from Edward J. Morrier, Framingham Advocates for the Sudbury River on the December 1992 "Draft Final Feasibility Study Report - Revision 3," Halliburton NUS with the attached "Technical Advisor's Review - Draft Final Feasibility Study Report - Revision 3," Fugro & McClelland and Focus Group (March 8, 1993).
5. Cross-Reference: Comments Dated March 10, 1993 from Paul G. Wallach, Hale and Dorr (Attorney for Nyacol Products, Inc. and submitted on behalf of Rohm Tech, Inc., AIF Realty Trust, Environmental Restoration Engineering Trust, Dr. Robert M. Lurie, MCL Development Corporation, Dr. Thomas L. O'Connor, and PQ Corporation) on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I and the December 1992 "Draft Final Feasibility Study Report - Revision 3," Halliburton NUS. [Filed and cited as entry number 43 in 5.3 Responsiveness Summaries].

4.6 Feasibility Study (FS) Reports (cont'd.)

6. Cross-Reference: Comments Dated March 1993 from Geraghty & Miller, Inc. for Nyacol Products, Inc. on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I and the December 1992 "Draft Final Feasibility Study Report - Revision 3," Halliburton NUS [Filed and cited as entry number 44 in 5.3 Responsiveness Summaries].

4.9 Proposed Plans for Selected Remedial Action

1. "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I (December 1992).

5.0 Record of Decision (ROD)

5.3 Responsiveness Summaries

1. Cross-Reference: Responsiveness Summary is an attachment to the March 30, 1993 "Record of Decision," EPA Region I [Filed and cited as entry number 1 in 5.4 Record of Decision (ROD)].

*The following citations indicate documents received by EPA Region I during the formal comment period.*

2. Comments Dated January 12, 1993 from Ira Nadelman, U.S. Army Corps of Engineers on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
3. Comments Dated January 13, 1993 from Milton and Shirley Morrisette on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
4. Comments Dated January 13, 1993 from Frank Karayianes, Town of Ashland Fire Department on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
5. Comments Dated January 14, 1993 from Paul D. Sharon, Town of Ashland on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
6. Comments Dated January 15, 1993 from Mary Jude Pigsley, Hale and Dorr (Attorney for Nyacol Products, Inc.) on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
7. Comments Dated January 18, 1993 from Duchin L. Blich on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.

5.3 Responsiveness Summaries (cont'd.)

8. Comments Dated January 18, 1993 from Rosalie Porter on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
9. Comments Dated January 18, 1993 from A.C. Porter on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
10. Comments Dated January 18, 1993 from Steven R. Barss on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
11. Comments Dated January 18, 1993 from Arlene Evans on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
12. Comments Dated January 18, 1993 from David Aester on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
13. Comments Dated January 18, 1993 from David Thompson and Satten Beggs Thompson on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
14. Comments Dated January 18, 1993 from Lina Ricci on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
15. Comments Dated January 18, 1993 from Jim and Carole Walker on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
16. Comments Dated January 18, 1993 from Edward and Antonette M. Davis on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
17. Comments Dated January 22, 1993 from Jeffrey A. and April A. Plotts on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
18. Comments Dated January 22, 1993 from Walt H. Chin on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
19. Comments Dated January 22, 1993 from Steve McSwatt on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
20. Comments Dated January 22, 1993 from Paula McGrath on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.

5.3 Responsiveness Summaries (cont'd.)

21. Comments Dated January 22, 1993 from Deborah S.S. Macchi on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
22. Comments Dated January 22, 1993 from Kenneth C. Caldwell on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
23. Comments Dated January 22, 1993 from Linda and Harvey Hecker on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
24. Comments Dated January 22, 1993 from Michael Hines on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
25. Comments Dated January 22, 1993 from Cathleen B. Hines on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
26. Comments Dated January 22, 1993 from Lisa J. Glaskin on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
27. Comments Dated January 25, 1993 on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
28. Comments Dated January 26, 1993 from Colin Hoogeboom on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
29. Cross-Reference: Transcript, Public Hearing on Proposed Plan for the Continuing Source Areas of the Sudbury River Study Area (January 27, 1993) [Filed and cited as entry number 3 in 13.4 Public Meetings].
30. Comments Dated January 29, 1993 from Paul D. Sharon, Town of Ashland on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
31. Comments Dated February 1, 1993 from William Sullivan, Sudbury, Assabet, and Concord Wild and Scenic River Study Committee on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
32. Comments Dated February 1, 1993 from Robert Scherer on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
33. Comments Dated February 4, 1993 from Gordon E. Beckett, U.S. Department of the Interior Fish and Wildlife Service on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.

5.3 Responsiveness Summaries (cont'd.)

34. Comments Dated February 7, 1993 from Constance Mannal on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
35. Comments Dated February 7, 1993 from Carol Tessier on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I with the attached Letter Dated March 1, 1993 from Pamela J. Shields, EPA Region I.
36. Comments Dated February 11, 1993 from Carol A. Gumbart, Town of Wayland on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
37. Comments Dated February 17, 1993 from Deborah S.S. Macchi on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
38. Comments Dated February 19, 1993 from Mark S. Tisa, Commonwealth of Massachusetts Division of Fisheries and Wildlife on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I with the attached Comments Dated February 4, 1993 from Gordon E. Beckett, U.S. Department of the Interior Fish and Wildlife Service.
39. Comments Dated March 2, 1993 from Henry M. Fassler, Town of Ashland Board of Health on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
40. Comments Dated March 3, 1993 from Frank Karayianes, Town of Ashland Fire Department on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
41. Comments Dated March 10, 1993 from Helen Waldorf, Commonwealth of Massachusetts Department of Environmental Protection on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.
42. Comments Dated March 10, 1993 from Robert G. Edwards, Marc L. Fleischaker, Andrew C. Cooper, Arent Fox Kintner Platkin & Kahn (Attorney for Rohm Tech, Inc. and submitted on behalf of AIF Realty Trust, Environmental Restoration Trust, Dr. Robert M. Lurie, MCL Development Corporation, Nyacol Products, Inc., Dr. Thomas L. O'Connor, and PQ Corporation) on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I.

5.3 Responsiveness Summaries (cont'd.)

43. Comments Dated March 10, 1993 from Paul G. Wallach, Hale and Dorr (Attorney for Nyacol Products, Inc. and submitted on behalf of Rohm Tech, Inc., AIF Realty Trust, Environmental Restoration Engineering Trust, Dr. Robert M. Lurie, MCL Development Corporation, Dr. Thomas L. O'Connor, and PQ Corporation) on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I and the December 1992 "Draft Final Feasibility Study Report - Revision 3," Halliburton NUS.
44. Comments Dated March 1993 from Geraghty & Miller, Inc. for Nyacol Products, Inc. on the December 1992 "EPA Proposes Cleanup Plan to Address Sediment Contamination in the Continuing Source Areas of the Sudbury River Study Area," EPA Region I and the December 1992 "Draft Final Feasibility Study Report - Revision 3," Halliburton NUS.

5.4 Record of Decision (ROD)

*The map associated with the document cited below as entry number 1 may be reviewed, by appointment only, at the EPA Region I Records Center in Boston, Massachusetts.*

1. "Record of Decision," EPA Region I (March 30, 1993).

11.0 Potentially Responsible Party (PRP)

11.9 PRP-Specific Correspondence

1. Letter from Richard A. Haworth, EPA Region I to Paul Nightingale, Goodwin, Procter & Hoar (Attorney for the Estate of Roland E. Derby, Sr.) (July 6, 1992). Concerning notification of the removal action at the site and potential liability for that action.
2. Letter from Richard A. Haworth, EPA Region I to Paul Nightingale, Goodwin, Procter & Hoar (Attorney for the Estate of Roland E. Derby, Jr.) (July 6, 1992). Concerning notification of the removal action at the site and potential liability for that action.
3. Letter from Richard A. Haworth, EPA Region I to Jacqueline F. Allen, Consolidated Rail Corporation (July 6, 1992). Concerning notification of the removal action at the site and potential liability for that action.
4. Letter from Richard A. Haworth, EPA Region I to Edward J. Camille (July 6, 1992). Concerning notification of the removal action at the site and potential liability for that action.
5. Letter from Richard A. Haworth, EPA Region I to Robert E. Gayner, Ashland Realty Development Corporation (July 6, 1992). Concerning notification of the removal action at the site and potential liability for that action.
6. Letter from Richard A. Haworth, EPA Region I to Robert E. Gayner, MCL Development Corporation (July 6, 1992). Concerning notification of the removal action at the site and potential liability for that action.
7. Letter from Richard A. Haworth, EPA Region I to Robert E. Gayner (July 6, 1992). Concerning notification of the removal action at the site and potential liability for that action.

11.9 PRP-Specific Correspondence (cont'd.)

8. Letter from Richard A. Haworth, EPA Region I to Scott Taylor (July 6, 1992). Concerning notification of the removal action at the site and potential liability for that action.
9. Letter from Richard A. Haworth, EPA Region I to William M. Leacu (July 6, 1992). Concerning notification of the removal action at the site and potential liability for that action.
10. Letter from Richard A. Haworth, EPA Region I to Martha E. and Nelson Holden, Holden-Ashland Trust (July 6, 1992). Concerning notification of the removal action at the site and potential liability for that action.
11. Letter from Richard A. Haworth, EPA Region I to Robert Lurie (July 6, 1992). Concerning notification of the removal action at the site and potential liability for that action.
12. Letter from Richard A. Haworth, EPA Region I to J. Thomas Robinson, Nyacol Products, Inc. (July 6, 1992). Concerning notification of the removal action at the site and potential liability for that action.
13. Letter from Richard A. Haworth, EPA Region I to Ernest G. Posner, PQ Corporation (July 6, 1992). Concerning notification of the removal action at the site and potential liability for that action.
14. Letter from Richard A. Haworth, EPA Region I to Thomas O'Connor (July 6, 1992). Concerning notification of the removal action at the site and potential liability for that action.
15. Letter from Richard A. Haworth, EPA Region I to Ekkehard Grampp, Rohm Tech, Inc. (July 6, 1992). Concerning notification of the removal action at the site and potential liability for that action.
16. Letter from Richard A. Haworth, EPA Region I to John J. Glynn, Jr., Environmental Restoration Engineering Trust (July 6, 1992). Concerning notification of the removal action at the site and potential liability for that action.
17. Letter from Richard A. Haworth, EPA Region I to John Glynn, Jr., AIF Realty Trust (July 6, 1992). Concerning notification of the removal action at the site and potential liability for that action.
18. Letter from Merrill S. Hohman, EPA Region I to Risa H. Weinstock, American Color & Chemical Corporation (December 28, 1992). Concerning a notice of potential liability for site cleanup.

13.0 Community Relations

13.3 News Clippings/Press Releases

Press Releases

1. "Anglers Cautioned on Sudbury River Fish," Department of Fisheries, Wildlife and Environmental Law Enforcement, Department of Public Health, Department of Environmental Quality Engineering, and the Metropolitan District Commission (April 3, 1986). With attached "Health Advisory - Mercury Contamination of Sudbury River Fish," Commonwealth of Massachusetts Department of Public Health (March 28, 1986).
2. "Environmental News - EPA Announces Sudbury River Sampling Results," EPA Region I (July 26, 1991).
3. "EPA to Post Warning Signs in Sudbury River to Advise Against Consumption of Fish," EPA Environmental News (June 11, 1992).

13.3 News Clippings/Press Releases (cont'd.)

4. "EPA Meeting to Discuss Cleanup Action Proposal for Nyanza Chemical Waste Dump Site," EPA Environmental News (December 24, 1992).

13.4 Public Meetings

1. "Public Meeting Summary - June 8, 10, 11, 1992," EPA Region I.
2. "Public Meeting Summary - January 6, 1993," Halliburton NUS (March 1993).
3. Transcript, Public Hearing on Proposed Plan for the Continuing Source Areas of the Sudbury River Study Area (January 27, 1993).

13.5 Fact Sheets

1. "EPA Announces the Results of Remedial Investigation and Risk Assessment Studies," EPA Region I (May 1992).

13.7 Technical Assistance Grants

1. "The United States Environmental Protection Agency Announces Technical Assistance Grant Application to be Filed for Nyanza Chemical Superfund Site," EPA Region I (December 2, 1991).

16.0 Natural Resource Trustee

16.1 Correspondence

1. Cross-Reference: Memorandum from Susan Svirsky, EPA Region I to Ken Carr and Steve Mierzykowski, United States Department of the Interior, Fish and Wildlife Service (May 21, 1992). Concerning a summary of outstanding issues at the site [Filed and cited as entry number 1 in 4.1 Correspondence].
2. Cross-Reference: Letter from Kenneth Finkelstein, U.S. Department of Commerce, National Oceanic and Atmospheric Administration (NOAA) to Pamela Shields, EPA Region I (December 24, 1992). Concerning NOAA's comments on the draft Proposed Plan for the site [Filed and cited as entry number 2 in 4.1 Correspondence].

17.0 Site Management Records

17.7 Reference Documents

1. "Massachusetts Drinking Water Standards and Guidelines," Commonwealth of Massachusetts Department of Environmental Quality Engineering (October 1989).
2. "The Nyanza Site, Ashland, Massachusetts Report," EPA Environmental Response Team (1987).

17.8 State and Local Technical Records


1. "The Sudbury-Assabet-Concord Basin Water Quality Management Plan - 1981," Commonwealth of Massachusetts Department of Environmental Quality Engineering (January 1982).
2. "Metals in Sudbury River Fish 1985," Commonwealth of Massachusetts Department of Environmental Quality Engineering (1985).
3. Letter from Richard J. Chalpin, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Ben Montenegro, Town of Ashland Highway Department (January 7, 1986). Concerning explanation of the Initial Remedial Measure.
4. "Sudbury River Basin 1986 Water Quality Survey and Wastewater Discharge Data," Commonwealth of Massachusetts Department of Environmental Quality Engineering (September 1987).
5. "Final Phase II Report," Wehran Engineering Corp. for Commonwealth of Massachusetts Department of Environmental Quality Engineering (October 1987).
6. Letter from Helen Waldorf, Commonwealth of Massachusetts Department of Environmental Protection to Ben Montenegro, Town of Ashland Highway Department (November 30, 1990). Concerning the Chemical Brook Culvert.
7. Letter from Charla Reinganum, Commonwealth of Massachusetts Department of Environmental Protection to Patricia Corcoran, Massachusetts Water Resources Authority (March 8, 1991). Concerning usage of Framingham reservoirs.
8. "Draft - The Future Role of the Sudbury Reservoirs and Watershed in the MDC/MWRA Water Supply System - A Review of Alternatives," Massachusetts Water Resources Authority (November 1991).

# Section II

# Guidance Documents

## GUIDANCE DOCUMENTS

EPA guidance documents may be reviewed at the EPA Region I Records Center in Boston, Massachusetts.

### General EPA Guidance Documents


1. 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. [C005]

2. U.S. Environmental Protection Agency. Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended October 17, 1986. [C018]

3. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Superfund Public Health Evaluation Manual (EPA/540/1-86/060, OSWER Directive 9285.4-1), October 1986. [5014]

4. 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. [2010]

5. 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, OSWER Directive 9355.0-7B), March 1987. [2101]

6. U.S. Environmental Protection Agency. Office of Water Regulations and Standards. Quality Criteria for Water 1986 (EPA/440/5-86/001), May 1, 1987. [4003]

7. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. A Compendium of Superfund Field Operations Methods (OSWER Directive 9355.0-14), December 1987. [2100]

8. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Draft Guidance on Conducting Remedial Investigations and Feasibility Studies under CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act), March 1988. [C021]

9. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Superfund Exposure Assessment Manual (EPA/540/1-88/001, OSWER Directive 9285.5-1), April 1988. [5013]

10. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Community Relations in Superfund: A Handbook (Interim Version) (EPA/540/G-88/002, OSWER Directive 9230.0-3A), June 1988. [1000]

11. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Draft Guidance on CERCLA Compliance with Other Laws Manual (OSWER Directive 9234.1-01), August 8, 1988. [3002]

12. 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. [2002]

13. U.S. Environmental Protection Agency. Office of Policy Analysis. Review of Ecological Risk Assessment Methods (EPA/230-10-88-041), November 1988.

14. Interagency Cooperative Publication. Federal Manual for Identifying and Delineating Jurisdictional Wetlands, January 1989. [C118]

15. U.S. Environmental Protection Agency. Office of Drinking Water. Drinking Water Standards and Health Advisories Memorandum, April 5, 1989.

16. U.S. Environmental Protection Agency. Risk Assessment Work Group, Region I. Supplemental Risk Assessment Guidance for the Superfund Program (Draft Final) (EPA/901/5-89/001), June 1989. [C104]

17. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Risk Assessment Guidance for Superfund - Volume I: Human Health Evaluation Manual (Part A - Interim Final) (EPA/540/1-89/002), December 1989. [C174]

18. U.S. Environmental Protection Agency. Office of Policy, Planning and Evaluation. Risk Assessment Methods: A Review and Evaluation of Past Practices in the Superfund and RCRA programs (EPA-230-03-89-044), 1989.

19. U.S. Environmental Protection Agency. Office of Health and Environmental Assessments, Exposure Assessment Group. Exposure Factors Handbook, 1989. [5020]

20. U.S. Environmental Protection Agency. Office of Water Regulations and Standards, Criteria and Standards Division. Assessing Human Health Risks from Chemically Contaminated Fish and Shellfish, 1989.

21. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Risk Assessment Guidance for Superfund: Volume II Environmental Evaluation Manual Interim Final (EPA/540/1-89/001), 1989. [5024]

22. "National Oil and Hazardous Substances Pollution Contingency Plan - Final Rule," Federal Register (Vol. 55, No. 46), March 8, 1990. [C063]

23. U.S. Department of Commerce, National Oceanic and Atmospheric Administration. The Potential for Biological Effects of Sediment-Sorbed Contaminants Tested in the National Status and Trends Program (NOAA Technical Memorandum NOS OMA 52).

24. U.S. Department of the Interior, Fish and Wildlife Service. Mercury Hazards to Fish, Wildlife, and Invertebrates: A Synoptic Review (Biological Report 85-1.10, Contaminant Hazard Reviews Report No. 10), April 1987.

25. Center for Lake Superior Environmental Studies. Development of Bioassay Procedures for Defining Pollution of Harbor Sediments - Part I (Report No. EPA-600/3-81-025), March 1981.

26. JRB Associates. Initial Evaluation of Alternatives for Development of Sediment-Related Criteria for Toxic Contaminants in Marine Waters (Puget Sound) (Report No. EPA-910/9-83-117), April 20, 1984.