



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
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DATE: September 11, 2020

SUBJ: Site Investigation Closure Memorandum
Creese & Cook Tannery (Former) NPL Site,
33 Water Street Site
Danvers, Massachusetts 01923

FROM: Michael J. Nalipinski, On-Scene Coordinator *mjn*
Emergency Response and Removal Section I

THRU: Edward J. Bazenas, Chief
Emergency Response and Removal Section I

TO: Creese & Cook Tannery (Former) 2 Site, 33 Water Street Site File

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 Creese & Cook Tannery (Former) NPL Site, 33 Water Street ("Site") in Danvers, Massachusetts. 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), 311(c)(i) as Liability Act 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 the Remedial Investigation for the East Study Area, dated March 1, 2018 and the Feasibility Study, dated September 2018. This data was reviewed specifically pertaining to the 33 Water Street property, excluding the area surrounding Building D where an EPA Removal Action occurred in 2012.
 - ii. Review of the Supplemental Human Health Risk Assessment Evaluation dated, April 2018 and the Final Screening Level Ecological Risk Assessment – East Study Area dated August 2017. Graphic representation of the contaminant distribution is located in the Phase II sampling and Activities Memorandum for the Creese and Cook NPL Site (45 Water

Street property) Danvers, Essex County, Massachusetts 13 through 16 May 2019

- iii. Interviews with the EPA Remedial Project Manager for the Creese and Cook NPL Site.
 - iv. The Site Review meeting on August 20, 2020, where site investigation results were shared with the Site case Team and Emergency Planning & Response branch management, and the decision to conduct a Removal Action was supported.
- 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.

<u>Hazardous Substances or Pollutants or Contaminants</u>	<u>Media</u>
Arsenic	Surface Soils
Chromium	Surface Soils
PAHs	Surface Soils
Lead	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 ☐

- b. Endangerment to the ecosystem:

Threat ☐ No Threat ☐ Evaluation Not Necessary ☐

3. The Removal Site Evaluation was terminated pursuant to section 300.410(f) of the NCP for the following reason(s). [Mark all that apply. Do NOT delete the rest.]

- ☐ 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.

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.

- b. 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 ☒ Non Time-Critical ☐

A Site Review Meeting was held on August 18, 2020. The Site team concurred with the recommendation to conduct a Removal Action at the site. This portion of the NPL Site was referred to the Removal Program to address contaminated surface soils. The soils are contaminated with arsenic, chromium, PAHs and lead. The Site Team agreed that the implementation of this removal action would be consistent with the 2019 Record of Decision required remedy for the Creese and Cook Tannery (Former).

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.
- ☒ 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. There has been no release, nor is there a potential threat of release of release, of oil at the site, and therefore an Oil Spill response under Appendix E to Part 300 of the NCP is not warranted.

cc: Edward J. Bzenas, Chief, Emergency Response and Removal Section I, SEMD

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