



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 5 1996

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations on the Fletcher Paint Superfund Site

FROM: Bruce K. Means, Chair 
National Remedy Review Board

TO: Linda M. Murphy, Director
Office of Site Remediation and Restoration
EPA Region 1

Purpose

The National Remedy Review Board (NRRB) has completed its review of the proposed remedial action for the Fletcher Paint Superfund site in Milford, New Hampshire. This memorandum documents the NRRB's advisory recommendations.

Context for NRRB Review

As you recall, the Administrator announced the NRRB as one of the October 1995 Superfund Administrative Reforms to help control remedy costs and promote consistent and cost-effective decisions. The NRRB furthers these goals by providing a cross-regional, management-level, "real time" review of high cost (and thus potentially controversial) proposed response actions. The Board will review all proposed cleanup actions where: (1) the estimated cost of the preferred alternative exceeds \$30 million, or (2) the preferred alternative costs more than \$10 million and is 50% more expensive than the least-costly, protective, ARAR-compliant alternative. The NRRB review evaluates the proposed actions for consistency with the National Contingency Plan and relevant Superfund policy and guidance. It focuses on the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks;

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the quality and reasonableness of the cost estimates for alternatives; Regional, State/tribal, and other stakeholder opinions on the proposed actions (to the extent they are known at the time of review); and any other relevant factors.

Generally, the NRRB makes "advisory recommendations" to the appropriate Regional decision maker before the Region issues the proposed plan. The Region will then include these recommendations in the Administrative Record for the site. While the Region is expected to give the Board's recommendations substantial weight, other important factors, such as subsequent public comment or technical analyses of remedial options, may influence the final Regional decision. It is important to remember that the NRRB does not change the Agency's current delegations or alter in any way the public's role in site decisions.

NRRB Advisory Recommendations

The NRRB reviewed the site package for the Fletcher Paint site as well as information submitted by the Town of Milford and General Electric (GE). The Board met on November 21, 1996, with the EPA site Remedial Project Manager Cheryl Sprague, her Section Chief Dick Boynton, and with State representatives Richard Peases and Charlie Berubie to review and discuss this information. Based on this review and discussion, the members of the NRRB support the Region's preferred source control strategy, which combines treatment of soils using thermal desorption with containment of residual soils, and the groundwater restoration strategy of natural attenuation.

The Board makes the following additional observations:

- The Board is concerned about the implementability of and short-term risk that may be posed by GE's innovative thermal treatment technology. We support and encourage GE's desire to develop this promising technology. However, the Board suggests that GE conduct any pilot-scale demonstration at a site away from local residences to minimize the inherent potential risks involved with such a demonstration.
- Given the uncertainty associated with natural attenuation in bedrock aquifers, the Region should clarify in its decision documents for this site the expected time frame for groundwater restoration.

The NRRB appreciates the Region's efforts to work closely with the State, community, and responsible party to identify the currently proposed remedy. The Board members also express their appreciation to both the Region and the State of New Hampshire for their participation in the review process. In particular, we would like to thank Cheryl Sprague for her excellent presentation. We encourage Region management and staff to work with their Regional NRRB representative and the

Headquarters Region 1/9 Regional Accelerated Response Center to discuss appropriate follow-up actions.

Please do not hesitate to give me a call at 703-603-8815 if you have any questions.

cc: S. Luftig
E. Laws
T. Fields
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B. Breen

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