Former National Fireworks Site Hanover, Massachusetts

Massachusetts Contingency Plan (MCP) Release Tracking Number 4-0000090

September 24, 2019

Former National Fireworks Site Site Background

- ➤ Site comprises approximately 240 acres of property generally located between King and Winter Streets in Hanover
- ➤ Historical activities at the Site included research, development, manufacture and testing of munitions and pyrotechnics for the United States Government and some commercial manufacture of civilian fireworks from 1907-1970
- ➤ Lead, mercury, organic solvents, and propellants & explosives, were used in manufacturing operations at the Site

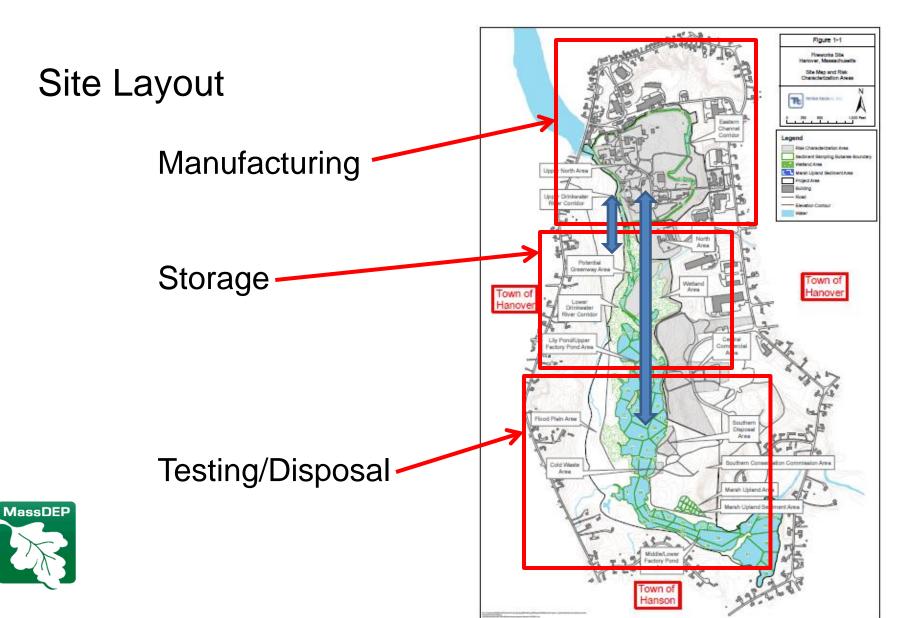


Former National Fireworks Site Site Background

- ➤ Several companies, including National Fireworks, Inc., operated at the Site until approximately 1970
- An industrial park currently operates at the northern & eastern portions of the Site
- ➤ The Town of Hanover purchased approximately 130 acres of the Site in the 1970s



Former National Fireworks Site



Who is Responsible for Cleanup?

Potentially Responsible Parties (PRPs)

- Fireworks Site Joint Defense Group (FSJDG)
 - National Coating Corporation
 - Massachusetts Institute of Technology
 - Susquehanna Corporation (Bankrupt)
 - Kerr-McGee Chemical Corporation (Tronox-Bankrupt)
 - Tronox filed for bankruptcy in January 2009
 - Expendable Trust (\$68 mil) established for reimbursement or payment of response action costs on February 25, 2011
 - Trustee (MassDEP Commissioner) determines reimbursement
- U.S. Department of Defense (Army, Air Force and Navy)
- All property owners where Site contaminants have come to be located

- MassDEP tasked with ensuring the cleanup of oil and hazardous material through M.G.L. Chapter 21E and the Massachusetts Contingency Plan (310 CMR 40.0000 et seq. – the MCP)
- A Licensed Site Professional (LSP, Lawrence Kahrs, Tetra Tech, Inc.) is hired by the potentially responsible party/parties to conduct the investigations, recommend necessary actions, oversee response actions, document findings in reports and certify that the work was done in accordance with the MCP
- Typically, MassDEP provides regulatory oversight through audits of site work and documents, and determines reimbursement for response action costs under the Expendable Trust
- Due to the complexity of the Site, MassDEP is providing direct oversight of response actions and has done so throughout the process



- The MCP prescribes a phased approach to investigate and clean up oil and hazardous material for the protection of human health, safety, public welfare, and the environment
 - Phase I: Initial Site Investigation
 - Phase II: Comprehensive Site Assessment
 - Supplemental Phase II submitted to MassDEP on 7/2/2018
 - Phase III RAP: Remedial Action Plan
 - Evaluation and selection of cleanup alternatives
 - Draft submitted to MassDEP on 7/17/2019
 - Phase IV: Remedy Implementation Plan
 - Phase V: Operation, Maintenance, and/or Monitoring



- ➤ Phase II findings:
 - Mercury detected in sediment, soil, groundwater and fish tissue
 - Additional sediment sampling will be conducted between Factory
 Pond Dam and Luddam's Ford Dam
 - Lead and other metals detected in soil, groundwater and sediment across the Site
 - Volatile Organic Compounds have been detected in soil and groundwater at the Site
 - Additional work conducted
 - Indoor air sampling
 - Irrigation well sampling



Risk Characterization

 Identifies and evaluates Site conditions to characterize risk of harm to (human) health, safety, public welfare and the environment

Phase II Risk Characterization findings:

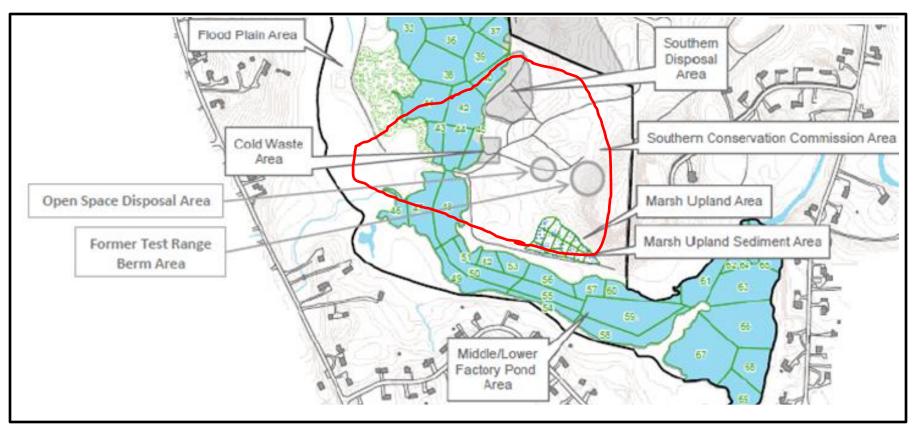
- No public or private water supply wells have been impacted by the contaminants released at the Site
- Potential risk from direct contact with metal-impacted soil
 - Site access is restricted & patrolled by Hanover PD
 - Impacted soil will be excavated and disposed of off-Site
- Risks to people, fish-eating birds and wildlife from ingestion of contaminants found in fish
 - Fish advisory put in place
 - Remedial action is necessary to remove impacted sediment
 Unexploded munitions recently identified in Factory Pond
 - access is restricted until removal can be completed



- The MCP also mandates the implementation of Immediate Response Actions (IRAs) to eliminate Imminent Hazards (i.e., immediate threats to human health, safety, public welfare or the environment)
 - Munitions response work currently ongoing at the Site
- The MCP provides for public involvement opportunities at various points throughout the phased process.



Location of Munitions Risk Reduction Immediate Response Action





Former National Fireworks Site List of Contacts

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