Former National Fireworks Site Hanover, Massachusetts

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

November 15, 2017

Former National Fireworks Site

- ➤ 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, and organic solvents, among other chemicals, were used in manufacturing operations at the Site

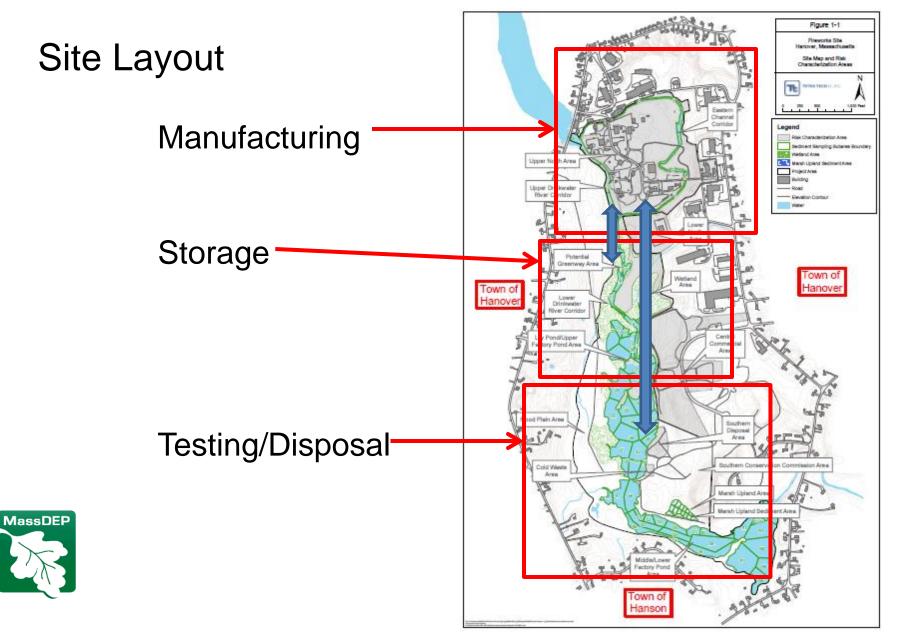


Former National Fireworks Site

- > Several companies, including National Fireworks, Inc., operated at the Site until 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
 - 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 established for reimbursement or payment of response action costs
 - Trustee (MassDEP Commissioner) determines reimbursement
- U.S. Department of Defense
- All property owners where Site contaminants have come to be located

Regulatory Framework

- MassDEP tasked with ensuring the cleanup of oil and hazardous material (M.G.L. Chapter 21E)
- Chapter 21E is implemented through regulations known as the Massachusetts Contingency Plan (310 CMR 40.0000 et seq. – the MCP)
- A Licensed Site Professional (e.g. Tetra Tech, Inc.) is hired by the responsible party/parties to conduct the investigations, recommend necessary actions, and to document findings in reports



Regulatory Framework

- The MCP prescribes a phased approach to investigate and cleanup 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
 - Nature and extent of contamination and risk characterization
 - Phase III: Remedial Action Alternatives Analysis
 - Evaluation and selection of cleanup alternatives
 - Phase IV: Remedy Implementation
 - Phase V: Operation, Maintenance, and/or Monitoring
- The MCP also mandates the implementation of timecritical response actions to eliminate Imminent Hazards to human health, safety, public welfare or the environment
 - Immediate Response Action
 - A time-critical action to eliminate an Imminent Hazard



Recent Site Activities

- May 2017 MassDEP received a Plan proposing risk reduction activities for soil/military munitions at the Cold Waste Area (CWA) and Former Test Range Berm Area (FTRBA)
- May 2017 MassDEP received notification of a potential Imminent Hazard to public safety that required an Immediate Response Action (IRA) due to material consistent with military munitions discovered in the Open Space Disposal Area (OSDA)

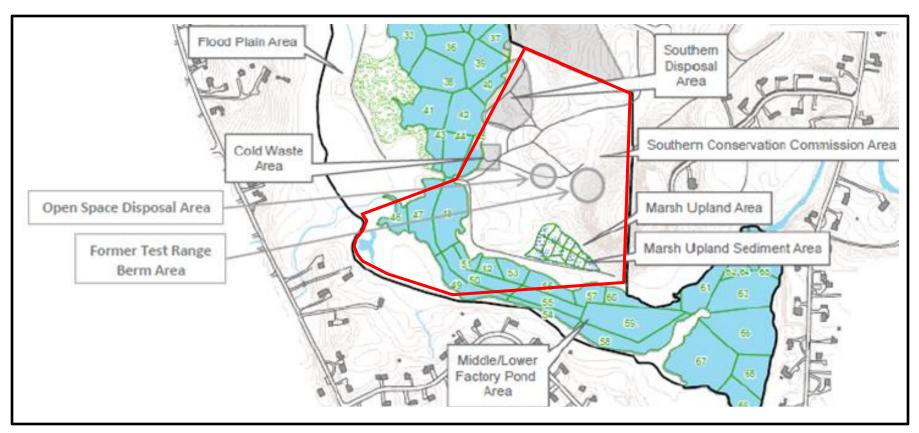


Recent Site Activities

- ➤ July 2017 MassDEP issued a Request for an Immediate Response Action Plan Modification given the need to expand the scope of the munitions investigation due to the quantity of munitions materials identified within multiple areas that could pose a public safety risk
- September 6, 2017 MassDEP received the Immediate Response Action Plan modification from the Fireworks Site Joint Defense Group and approved the plan on September 29, 2017



Location of Immediate Response Action





Next Steps

- Completion of the Immediate Response Action for the investigation and removal of munitions at the Site
- Determine if the full nature and extent of contaminants at the Site have been identified
- Complete any additional sampling and other investigation work at the Site
- Finalize the Phase II and Phase III Reports
- Implement the overall Site cleanup remedy