## Troy Mills Landfill Site Troy

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Troy Mills, Inc. went into Chapter 7 bankruptcy in 2003, and its landfill on Rockwood Brook was added to the National Priorities List on September 29, 2003. The landfill is about 1.5 miles from the center of Troy, situated off a former rail line (now a trail) on a 270-acre property. Troy Mills used 11 acres of the property as an industrial waste disposal area from 1967 to 2001. Between 1967 and 1978, two acres of the 11-acre landfill were used for disposal of drums of liquid waste and sludge containing Varsol<sup>TM</sup> (a trade name for mineral spirits), vinyl resins, plasticizers, pigments, top-coating products, and industrial organic solvents. After 1978, the remaining nine acres were used to dispose of waste fabric scraps and other solid waste from the company's manufacturing complex.

In 2003, the U.S. Environmental Protection Agency (EPA) implemented an interim system to collect free product in a series of interceptor trenches. During 2004 and 2005, EPA removed 7,687 buried drums containing approximately 30,000 gallons of flammable liquid waste and more than 3,000 cubic yards of other wastes. Approximately 26,000 tons of contaminated soils were also removed, and all materials were safely disposed off-site. The area was re-graded, a permeable soil cap was placed over the former drum disposal area, and the site was reseeded. A Record of Decision (ROD), signed in September 2005, requires long-term environmental monitoring, maintenance of the interceptor trenches and landfill cap, and establishment of property use restrictions.

Since October 2006, the New Hampshire Department of Environmental Services (NHDES) has been implementing the ROD under a Cooperative Agreement with EPA.

The town elected not to accept ownership of the property from the bankruptcy court, and future ownership is uncertain. The bankruptcy trustee has granted NHDES a permanent easement both to access the 270-acre property and to restrict activities and uses in the vicinity of the former disposal site and the groundwater management zone. The easement is on record at the Cheshire County Registry of Deeds.

The first Five Year Review was completed in September 2010. Recommendations included conducting a supplemental investigation of the residual free product source area, further evaluating the effectiveness of the interceptor trenches, performing a supplemental hydrogeologic study to confirm the effectiveness of the monitored natural attenuation management of migration remedy at the site and to better forecast time to cleanup, and reviewing existing data to evaluate potential ecological risk within the ground water/surface water transition zone.

In 2011 and 2012, EPA and NHDES completed a Laser Induced Fluorescence investigation to define the extent of residual free product in and around the interceptor trenches. In 2013, the interceptor trenches were dismantled and removed along with excavation of limited residual free product-containing soil encountered during this activity, and trench-area restoration activity was completed in 2014.

The second Five Year Review was completed in September 2015. The review found that the implemented remedy is currently protective of human health and the environment but that additional actions should be considered in order to achieve long-term protectiveness, including limiting trespassing and access and reevaluating the extent of sediment contamination resulting from an increase in flooded-area caused by beaver activity. In 2017, the recommendations outlined in the second Five Year Review were addressed. Site access controls were revamped and an EPA sediment study concluded that the conditions in Rockwood Brook sediments are unlikely to result in population-level effects to the local benthic macroinvertebrate community from exposure to landfill seepage.

The site transitioned from Long-Term Response Action (LTRA) to Operation and Maintenance (O&M) on September 18, 2017, transferring site remedial responsibilities to NHDES. EPA will continue to have Five-Year Review responsibilities. NHDES continues to conduct periodic monitoring of the ground water and surface water at the site.