



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

### Property Access Form – Removal Action

Site Name: FMO Pesticide Site  
North Whitehall Township, PA

Owner:

Location: Orefield, PA 18069

Purpose: **Site Removal Action** – The purpose of this action is to reduce or eliminate potential exposure to contaminated surface soils with arsenic and lead levels that exceed the Action Concentrations of 73.4 parts per million (ppm) for arsenic and 400 ppm for lead. By taking the actions below, the OSC is providing clean buffer areas around the house, and at the children's play area and existing vegetable garden. This will allow residents to conduct normal activities outdoors with an acceptable level of risk in these specific areas near their home. This action does not include ornamental gardens. EPA is taking this action to protect toddlers from incidental exposures to arsenic and lead in their yard near the house, the designated play area, and vegetable garden. Properties that have been identified through Phase I and Phase II soil sampling studies will be addressed by this action. The following activities will be performed as part of the Site Removal Action:

**Step 1: Extent of Contamination Soil Sampling** – If necessary, extent of contamination soil sampling will be conducted to delineate cells of contamination at specific property locations as described below. Soil samples will be analyzed for concentrations of lead and arsenic at an on-site laboratory. Results of this sampling will be provided to the property owner and occupant of where the soil was collected

- Properties that had front yard surface soil samples that exceeded the Action Concentrations will have soil samples collected around a 40-foot perimeter of the front yard, extending to both sides of the home. Grab samples will be collected at 10-foot intervals within this 40-foot perimeter.
- Properties that had back yard surface soil samples that exceeded the Action Concentrations will have soil samples collected around a 40-foot perimeter of the back yard, extending to both sides of the home. Grab samples will be collected at 10-foot intervals within this 40-foot perimeter.
- Properties that had toddler play area surface soil samples that exceeded the Action Concentrations will have 5 equally distributed grab samples collected from an approximately 400 square feet area. Individual 100 square foot cells will be identified on a residential-specific basis based upon the shape of this play area.
- Properties that had existing vegetable garden area surface soil samples that exceeded the Action Concentrations will have 5 equally distributed grab samples collected from an approximately 400 square feet area.

**Step 2: Cleanup** – Contaminated soil that is above the Action Concentration of 73.4 ppm arsenic and 400 ppm lead and meet the criteria outlined in the Action Memorandum will be addressed as follows:

- 40-foot Buffer Area (front yard and/or back yard) - Any cell identified for action will be excavated in 6-inch lifts. Additional soil sampling will be performed after the 6-inch removal to document the level of lead and arsenic contamination at depth. Excavated cells will be backfilled with 6 inches of clean soil.
- Toddler Play Area - Any cell identified for action will be excavated to a depth of 6 inches and backfilled with 6 inches of clean soil.
- Existing Vegetable Garden Area – The contaminated existing vegetable garden area will be replaced with a raised bed vegetable garden. Raised beds will be constructed of recycled plastic lumber to a height of 12 inches and filled with clean soil.

**Step 3: Restoration** – Complete restoration of the excavated cells will include the installation of similar ground cover that existed prior to the excavation (e.g., sod, mulch, grass seed). In addition, this will include reasonable restoration of property (e.g. fences, driveway, etc.) that may be disturbed during this action. .

**Step 4: Final Inspection** – EPA will meet with each property owner at the completion of the restoration step to perform a final inspection of the property. The objective of this meeting is to review what has been completed and identify any outstanding issues that the property owner may have.

**Step 5: Closeout Letter** – EPA will issue a closeout letter to document actions taken during this action for each property. This letter will document where contamination is not completely removed, the presence of contamination at depth, and describe the protective measures that were taken to prevent exposure to the remaining contamination. This letter will include a map showing what and where actions have been taken and should be kept with the property deed by property owner and disclosed to any new prospective property purchaser.

Period: September 2010 to November 2011

I am either the owner of the above property, or have the authority as representative of the property owner(s) to grant or deny access to EPA for the above purpose.

I hereby **grant** access to the above property to EPA, Region III and its officers, employees, agents, consultants, and/or contractors and State personnel necessary for carrying out the activities described above. I understand that I may request a limit to the time and purpose of this access. I will be given a receipt for the samples, if requested.

Name (printed): \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Phone Number: \_\_\_\_\_ Cell Phone Number: \_\_\_\_\_

I hereby **deny** access to the above property. .

Name (printed): \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_