

POLREP # 2
Chem-Fab Site
Doylestown, PA 18901

Event: CERCLA Response Activities

ATTN: Region III RRC

I. Situation (April 1, 2014 – April 30, 2014)

- A. In January 2012, the Remedial Program completed a Focused Feasibility Study intended to evaluate alternatives to address threats presented by soils located at the Property. In December 2012, the Remedial Program issued a Record of Decision (ROD) selecting remedial action consisting of, among other things, the removal and off-site disposal of certain contaminated soils on the Property outside the footprint of the three commercial buildings on the Property.
- B. On November 8, 2012, using authority provided under EPA Delegation 14-2, the On-Scene Coordinator (“OSC”) authorized the expenditure of funds in an amount not to exceed \$50,000 to initiate a removal action intended to reduce VOCs in suites inside an office building located 300-360 North Broad Street (“Property”), which Property is included within the Site. To accomplish this, the OSC installed portable air purifiers into selected suites within the impacted building. The OSC subsequently collected additional data to evaluate the efficacy of such units combined with the existing building vapor mitigation system in reducing VOCs levels within the building.
- C. On September 19, 2013, EPA issued an Action Memorandum approving a scope change, the expenditure of additional funds, and an exemption to the statutory funding and time limits on the Removal Action. The selected Removal Action consisted primarily of the excavation and off-site disposal of certain contaminated soils presently located at the Property.
- D. For more information, see previous POLREPs.

II. Action Taken

- A. 4/1/14 to 4/4/14 – Continued soil removal operations (SW portion of the site) and air & RAD monitoring. Excavation area lined with geotextile fabric and backfilled. Continued removing concrete at the SW end of the site. During concrete removal an underground structure was found at the back of the eastern building which appears to be partly under the outside wall of the building. Also found pipes under the concrete running under the building to the south. Amendments added to the SW end of the site after the area was excavated. Concrete removed from the site for recycling. A second underground structure was found at the back of the eastern building. A shallow groundwater well was placed in the SW portion of the site in the excavation area.

- B. 4/7/14 to 4/11/14 – Continued soil removal operations, conducted air & RAD monitoring and collected solid samples. Concrete removal around the second underground structure revealed stained soils and a possible fill pipe for the structure. Continued concrete removal behind the eastern and western main building in the back corner. Soils contained a strong odor, high VOC readings (50+ ppm), and yellow staining were discovered in this area. It also appeared that there was a former underground structure located in this area. Collected samples collected from heavily stained/high VOC soils and second underground structure found on-site. The contents of the second structure were removed and placed into a roll-off. Three additional underground structures (#4, #5 and #6) were discovered during additional concrete removal. Underground structures #4 and #5 are located in line with underground structure #1 at the back of the eastern building, which also appear to be partly under the outside wall of the building. Underground structures #6 is directly south of underground structures #5. Collected the following samples: SOIL-01 collected from the area adjacent to underground structure #1 which had high VOC readings and yellow staining) and UST-02 collected from the roll-off which contains the contents of underground structure # 2. These samples were collected on 4/9/14. Underground structure #7 was discovered in the SE corner of the site. This structure was located deeper than the others and had a very strong odor. Underground structures #8 (appears to be mainly gravel) was discovered directly south of underground structures #4. Where possible the excavation area was backfilled.
- C. 4/14/14 to 4/18/14 – Continued soil removal operations, conducted air & RAD monitoring and collected solid samples. The contents of underground structures #1 and #5 were removed and placed into drums. Collected samples UST-01 and UST-05 on 4/14. Used the ppb multiRae to monitor some of the offices in the main building for VOCs. Collected samples from underground structures # 7 and #8 on 4/16. A sample was not collected from underground structure #6 because it contained only gravel. Removed soils in front of underground structures # 1, #4 and #5 (including soils where sample SOIL-1 was taken from, the contents of structure # 8 and #6). The OSC, RPM and ATSDR met with employees of the offices to explain the multiRAE readings. A shallow groundwater well was placed in the SW portion of the site in the excavation area, near underground structure # 5.
- D. 4/21/14 to 4/25/14 – Continued soil removal operations, conducted air & RAD monitoring and collected solid and air samples. Installed a pipe for future injections along the southern end of the eastern half of the main building. Pipe was then covered with gravel and geotextile fabric and additional fill. On 4/23, collected 3 indoor air samples from 3 of the offices and 1 ambient air sample from outside near the excavation area. Removed the remaining contents of underground structures #1 and #5 via a vac truck, which deposited the liquids into totes. Attempted to clean out underground structure #4, but only a small portion of the contents was able to be removed due to how hard it was . . . an auger was used to break up the contents of underground structure #4. Underground structures #1 and #5 were filled with concrete.

- E. 4/28/14 – 4/30/14 – Continued soil removal operations, conducted air & RAD monitoring and collected solid samples. Removed (via vac truck) most of the contents of underground structure #4 and placed into totes. Excavation near underground structure #7 uncovered underground structure # 9. Excavation east of underground structure #5 uncovered underground structure #10. This structure has a 24 inch pipe going into the bottom. Collected samples UST-10 and UST-10A on 4/28. Underground structure # 11 was discovered north of underground structure # 9. Collected samples UST-9, UST-11, SOIL-2 (collected from between underground structures #9 and #11), SOIL-3 (adjacent to south east wall of underground structure #11), SOIL-4 (8 inches from underground structure #5) on 4/29. No site activities on 4/30/14.

III. Future Actions

- A. Continue soil removal actions.
- B. Continue to receive clean fill.
- C. Add remaining amendments to the excavation area where necessary.
- D. Dust suppression will be implemented when necessary.

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