

**FEDERAL ON-SCENE COORDINATOR'S  
AFTER ACTION REPORT**

**for**

**Big Johns Salvage Site - Hoult Road  
Fairmont, Marion County, West Virginia  
8 May 1998 to 17 December 1998**



**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
WHEELING, WEST VIRGINIA**

**AR001189**

**Federal On-Scene Coordinator's After Action Report  
Big Johns Salvage Site - Hoult Road**

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**REGION III  
CERCLA REMOVAL ACTION**

**PROJECT # 453  
FACT SHEET**

**SITE:** Big Johns Salvage Site - Hoult Road

**SIZE:** approximately 1 acre

**LOCATION:** Fairmont, Marion County, West Virginia

**APPROVAL DATE:** 11 May 1998

**PROJECT DATES:** 8 May 1998 through 17 December 1998

**DESCRIPTION:** During the containment of a coal tar spill at the adjacent Sharon Steel property on 7 April 1998, WVDEP RCRA inspector John Hando requested that EPA investigate two excavated pits containing used oil and a glass cullet pile at the Big Johns Hoult Road Site. The Big Johns Hoult Road Site was the site of a PRP removal of a coal tar spill in 1983 and an EPA Removal Branch drum cleanup in the fall of 1992. Historical information related to the site indicates that coal tar is present at shallow depths below the ground surface. The current owner, John Morgan, declined responsibility and financial ability to perform removal actions at the site. Mr. Morgan provided written access to the site on 6 May 1998 to conduct removal actions.

**NATIONAL PRIORITIES LIST (NPL) STATUS:** This site is currently being assessed for inclusion on the National Priorities List.

**HAZARDOUS MATERIALS:** contaminated waste oil, diesel fuel and antifreeze

**QUANTITIES REMOVED:** 10,413 gallons of waste oils  
521.4 tons of non-hazardous stabilized soils

**OSC:** Jeffrey Dodd

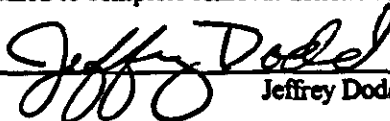
**REMOVAL CONTRACTOR:** IT Corporation, Monroeville, PA

**DISPOSAL LOCATION:** Ross Incineration Services, Inc., Grafton, OH (waste oils)  
Waste Management, Inc., Meadowfill Landfill, Bridgeport, WV (non-hazardous stabilized soils)

**PROJECT CEILING:** OPA Funding: \$45,000 / CERCLA Funding: \$200,000

**PROJECT COSTS:** OPA Costs: \$13,318 / CERCLA Costs: \$81,704

**COMMENTS:** The site was initially funded under the OPA of 1990 to address the threat of discharge of reported waste petroleum into an unnamed tributary of the Monongahela River. Upon discovery of the presence of CERCLA hazardous substances in the waste oils, funding under CERCLA was obtained to complete removal actions at the site.



Jeffrey Dodd, OSC


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**FOREWORD**

The On-Scene Coordinator (OSC), as mandated by the National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR Part 300 (NCP 1994), is required to provide a coordinated federal response capability at the scene of an unplanned or sudden release of oil or hazardous substance that poses a threat to the public welfare or the environment. In addition, the provisions of Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA), 1986, promote a coordinated federal, state, and local response to mitigate situations at hazardous waste sites that pose an imminent and substantial threat to public health and/or the environment.

Conditions at the Big Johns Salvage Site - Hoult Road presented an imminent and substantial risk of harm to human health and the environment due to the uncontrolled release of oil and hazardous substances to the environment, thereby providing a legal basis for federal response activities. The provisions of the NCP, Section 300.415, were implemented by the U.S. Environmental Protection Agency, Region III, Wheeling, West Virginia.

The OSC would like to extend thanks to all of the agencies and individuals who provided valuable assistance and expertise to ensure the successful completion of this cleanup effort.

  
Jeffrey Dodd  
On-Scene Coordinator  
U.S. EPA Region III  
Wheeling, West Virginia

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**1.0 INTRODUCTION**

**1.1 Initial Situation (Background/Site History)**

During the containment of a coal tar spill at the adjacent Sharon Steel property on 7 April 1998, WVDEP Resource Conservation and Recovery Act (RCRA) inspector John Hando requested that the U.S. Environmental Protection Agency (EPA) investigate two excavated pits containing used oil and a glass cullet pile at the Big Johns Salvage Site - Hoult Road in Fairmont, Marion County, WV. A potentially responsible party (PRP) cleanup action involving the removal of a coal tar spill occurred at the site in 1983. In the fall of 1992, an EPA removal action took place involving the cleanup of drums on the site. Historical information related to the site indicates that coal tar is present at shallow depths below the ground surface. The WVDEP indicated that the cullet pile was a hazardous waste due to elevated levels of lead contamination. The primary focus of this removal action was the stabilization and mitigation of the release of contaminated waste oils from the two excavated pits to an unnamed tributary of the Monongahela River.

**1.2 Site Location**

Big John's Salvage Site is located on Hoult Road in Fairmont, Marion County, West Virginia (see Appendix A, Site Location Map). The coordinates of the site are approximately 39° 29' 50" N, 80° 7' 6" W. The elevation of the site is approximately 1,000 feet. An environmentally sensitive area near the site includes an unnamed tributary to the Monongahela River on the western side of the site.

**1.3 Efforts to Notify and Compel Potentially Responsible Parties to Respond**

A deed search was conducted by Roy F. Weston, Inc. Site Assessment and Technical Assistance (SATA) team on 20 April 1998. The search revealed that the current owner of the site is Mr. John E. Morgan, President, Steel Fabricators, Inc. Steel Fabricators purchased the property in November 1997. Enforcement OSC Mike Welsh and Criminal Investigator (CI) Larry Richardson met with Mr. Morgan on 30 April 1998, to discuss the owner's potential liability under OPA and CERCLA and to gather background information on the release of oil into the waste pits. Steel Fabricators claimed that a contractor, William Braham, had been hired to move the tank and some scrap tires and steel from the property. The tank was ruptured during the move, causing the release. Steel Fabricators contained the oil in two pits but did not have funding for a cleanup. As a result, the PRP declined responsibility for the cleanup and the OSC initiated cleanup actions. On 6 May 1998, Steel Fabricators granted access to the EPA for a site investigation.

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**2.0 ROSTER OF AGENCIES, ORGANIZATIONS, AND INDIVIDUALS**

**2.1 Names and Addresses**

AGENCY	CONTACT	BRIEF DESCRIPTION OF DUTIES
U.S. Environmental Protection Agency, Region III Removal Branch Wheeling Office-Methodist Building 1060 Chapline Street Suite 303 Wheeling, WV 26003 (304) 234-0254	Jeffrey Dodd, OSC	Coordinated site activities of federal, local, and state officials. Directed the scope of work for cleanup and technical assistance contractors throughout the project.
U.S. Environmental Protection Agency, Region III Removal Enforcement & Oil Section Wheeling Office-Methodist Building 1060 Chapline Street Suite 303 Wheeling, WV 26003 (304) 234-0284	Dennis Matlock, OSC	Conducted enforcement efforts to compel PRP to conduct cleanup.
U.S. Environmental Protection Agency, Region III Removal Enforcement Branch & Oil Section 1650 Arch Street Philadelphia, PA 19103-2029 (215) 814-3285	Mike Welsh, OSC	Conducted enforcement efforts to compel PRP to conduct cleanup.
U.S. Environmental Protection Agency, Region III Criminal Investigation Division 1650 Arch Street Philadelphia, PA 19103-2029 (215) 814-3289	Larry Richardson	Assisted OSCs with PRP investigation.
U.S. Environmental Protection Agency, Region III Office of Regional Counsel 1650 Arch Street Philadelphia, PA 19103-2029 (215) 814-2647	Daniel Isales	Assistant Regional Counsel. Provided legal support in obtaining site access.

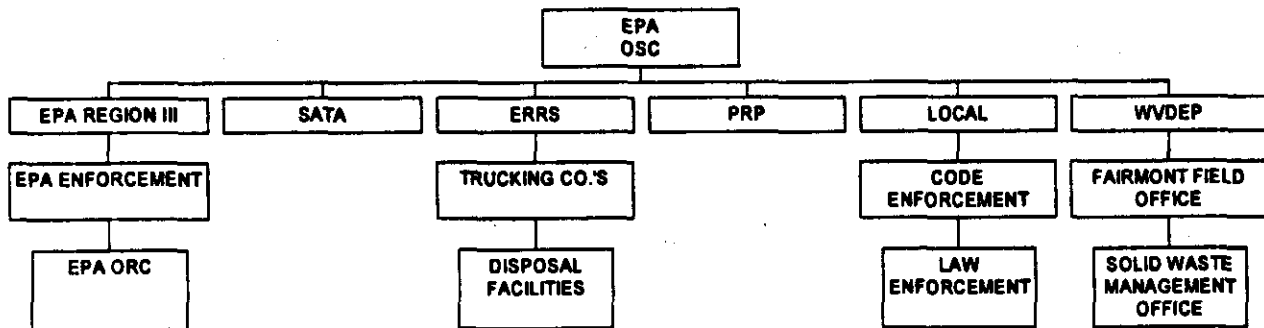
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AGENCY	CONTACT	BRIEF DESCRIPTION OF DUTIES
West Virginia Division of Environmental Protection 1304 Goose Run Road Fairmont, WV 26554 (304) 367-2734	John Hando Michael Miano Stan Moskal	Assisted the OSC with coordination of site activities.
West Virginia Division of Environmental Protection Solid Waste Management 1356 Hansford Street Charleston, WV 25301-1401 (304) 558-6350	Richard Cooke, Assistant Chief	Arranged for acceptance of waste disposal.
Roy F. Weston, Inc. Site Assessment Technical Assistance (SATA) 141 Waddles Run Road Wheeling, WV 26003 (304) 243-0800	Perry Gaughan Michelle Dallessandro Kurt Hileman Brian Burris Thomas Licker	Provided on-site air monitoring and sampling during removal activities. Provided the OSC with technical assistance and documentation of all site activities.
IT Corporation 2790 Mossdell Blvd. Monroeville, PA 15146-2792 (412) 372-7701	David Bahuriak Alex Fabrizi	Directed cleanup efforts of the site. Conducted pumping, excavation, and restoration activities. Coordinated transportation and disposal of the waste oils and soils to an approved facility.
Steel Fabricators, Inc. P.O. Box 2173 Fairmont, WV 26555 (800) 332-7617	John Morgan, Chairman	Current property owner. Potentially Responsible Party
City of Fairmont, Code Enforcement 200 Jackson Street P.O. Box 1428 Fairmont, WV 26555-1428 (304) 366-6211	Barry Soles, Code Official Jerry A. Chio, Code Official	Code Enforcement
Fairmont Police Department 211 Monroe Street Fairmont, WV 26554 (304) 366-2217	Steve Cain, Sergeant	Law Enforcement

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AGENCY	CONTACT	BRIEF DESCRIPTION OF DUTIES
Ross Incineration 36790 Giles Road Grafton, OH 44044 (440) 748-2171	David Herb Brian Slack	Disposal facility for waste oil.
Waste Management, Inc. Meadowfill Landfill Bridgeport, WV 26330 (304) 842-2784	Anna Chat	Disposal facility for non-hazardous soil.
Ross Transportation 36790 Giles Road Grafton, OH 44044 (440) 748-2171	Jim Archer Harvey Lance	Transported contaminated oil to the designated approved facility.
Mineral Transportation P.O. Box 313 Fairmont, WV 26554 (304) 366-0499	Keith Martin	Transportation of non-hazardous stabilized soils.
Freehold Cartage P.O. Box 5010 Freehold, NJ 07728 (732) 462-1001	John Lane	Transported drums to the designated approved facility.

## 2.2 Organization of the Response



## 3.0 NARRATIVE OF EVENTS

Removal activities at the Big Johns Salvage Site - Hoult Road began when a potential release of waste petroleum materials, stored in pits on site, threatened a small tributary to the Monongahela River. After the current owner of the property declined to take responsibility for the waste stored on site, OSC Dodd accessed the Oil Pollution Act fund and was assigned United States Coast Guard (USCG) Federal Pollution Number (FPN) 088-155 in May 1998. SATA collected samples of the material and had it analyzed. Results showed that waste material in the first pit contained



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waste motor oil and water and antifreeze mix in the second. In July 1998, Emergency Rapid Response Support (ERRS) contractors pumped out approximately 12,000 gallons of mixed waste oil and antifreeze from two pits to a frac tank located on site. Oil-saturated soil was stabilized and staged on site pending disposal. Disposal samples were collected and arrangements for transportation and disposal (T&D) of the waste were initiated. Review of disposal analytical data in September 1998 identified the presence of CERCLA hazardous substances in the waste oil. The OSC determined site conditions to be in accordance with factors listed in Section 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), and a CERCLA removal action was initiated by the OSC.

Site activities resumed in September 1998. ERRS pumped out approximately 10,000 gallons of mixed liquid waste from the frac tank for disposal. Two tanker trucks were filled and transported off site to Ross Incineration, Grafton, Ohio, an approved disposal facility. SATA conducted air monitoring during load-out operations levels of organic compounds and mercury vapor remained below action levels. After the load-out was completed ERRS pumped the remainder of the sludge into drums. Pressure washers were used to clean the tank. Water utilized for this operation was drummed and stored on site for subsequent disposal.

In October 1998 personnel returned to the site to solidify the saturated soil using cement kiln dust. ERRS used an excavator to churn up the soil as a hopper truck dropped its load of kiln dust. After mixing, ERRS covered the area with polyethylene sheeting and demobilized until the material stabilized and solidified. ERRS collected a sample of the stabilized soils for RCRA characterization.

Operations resumed on 17 December 1998 with the T&D of 521.4 tons of non-hazardous stabilized soil and wood debris. All materials were transported to Waste Management, Inc., Meadowfill Landfill in Bridgeport, WV for disposal. Personnel completed decontamination of equipment and demobilized from the site. The threats posed by the constituents in question at the site had been mitigated.

#### **4.0 RESOURCES COMMITTED**

##### **4.1 Initial Funding Request**

Initial funding for this site was provided by the USCG 2<sup>ND</sup> District under the OPA. The OSC opened FPN 088-155 on 11 May 1998 and received funds amounting to \$10,000 for administrative activities.

##### **4.2 Additional Funding Request**

Due to declination of the owner for responsibility of the waste oil, the OSC contacted the USCG 2<sup>ND</sup> District on 15 May 1998 for additional funding of \$20,000 under FPN 088-155 for removal contractor support to mitigate the threat of release of oil into an unnamed tributary of the Monongahela River. The OSC obtained additional funding under FPN 088-155 on 23 July 1998 in the amount of \$15,000 for transportation and disposal of the waste oil and soils.

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The site's funding was transferred from OPA to CERCLA funds on 10 August 1998 following determination of the presence of RCRA hazardous wastes present in the waste oil and soil. Special Bulletin A was issued on 10 August 1998 notifying activation of \$200,000 to fund the remaining removal activities at the site.

**4.3 Estimated Total Cost Summary**

**4.3.1 OPA Funding**

<u>AGENCY</u>	<u>COSTS</u>	<u>CEILING</u>
ERRS	\$11,792	\$35,000
SATA	\$ 1,181	\$ 8,500
EPA DIRECT	\$ 345	\$ 1,500
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TOTAL	\$13,318	\$45,000

Total percent ceiling utilized: 29.6%

**4.3.2 CERCLA Funding**

<u>AGENCY</u>	<u>COSTS</u>	<u>CEILING</u>
ERRS	\$68,966	\$150,000
SATA	\$ 4,466	\$ 15,000
EPA DIRECT	\$ 2,640	\$ 3,000
EPA INDIRECT	\$ 5,632	\$ 6,000
UNALLOCATED/CONTINGENCY		\$ 26,000
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TOTAL	\$81,704	\$200,000

Total percent ceiling utilized: 40.9%

**5.0 EFFECTIVENESS OF THE REMOVAL**

**5.1 Activities of the Various Agencies**

**5.1.1 Potentially Responsible Parties**

Through a deed search conducted by SATA on 20 April 1998, it was determined that a Potentially Responsible Party for the site is Mr. John E. Morgan, President, Steel Fabricators, Inc. Steel Fabricators purchased the property in November 1997. Following contact with the OSC, Steel Fabricators admitted to hiring a contractor to move the aboveground storage tank containing the waste oils, but declined responsibility and financial ability to conduct the cleanup.

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### **5.1.2 Federal Agencies**

Oversight of all Site activities was conducted by Jeffrey Dodd, U.S. EPA, Region III OSC. EPA Region III Civil Investigator Larry Richardson, OSCs Michael Welsh and Dennis Matlock provided removal enforcement support in attempting to get the PRP's to conduct response actions at the site.

### **5.1.3 State and Local Agencies**

State representation on site was provided by John Hando and Stan Moskal of the West Virginia Division of Environmental Protection (WVDEP). Local representation on site was provided by Barry Soles and Jerry Chio of the City of Fairmont Code Enforcement and Steve Cain of the Fairmont Police Department.

### **5.1.4 Contractors**

The contractors for this site consisted of a technical support team and a removal crew. The technical support team was the Site Assessment Technical Assistance (SATA) team from Roy F. Weston, Inc. SATA conducted an assessment of the site for the OSC, documenting all evidence of contamination and collecting samples from locations as specified by the OSC. SATA conducted air monitoring and provided health and safety monitoring during all removal operations.

Removal contractor support was provided by IT Corporation under EPA Region III's Emergency and Rapid Response Services contract. IT conducted pumping, stabilization, and removal operations of all waste oils and soils on site as specified by the OSC.

## **5.2 Analytical Synopsis**

The hazardous materials found on site consisted of two large pits of waste oils and surrounding soils. Following analysis of the waste oil, it was determined to be a mixture of spent oil and antifreeze. The contaminants present in the waste oil consisted of maximum concentrations of mercury (400 parts per million [ppm]), methylene chloride (1100 ppm), carbon tetrachloride (15 ppm), naphthalene (270 ppm), and numerous polynuclear aromatic hydrocarbons (PAH) in the hundreds of ppm range. The primary contaminant of concern was mercury which appeared to have migrated from the waste pits to the surrounding soils with the mercury concentrations up to 63.7 ppm. Mercury was also present in the cullet pile on site in amounts of 42.8 ppm in the cullet itself and 115 ppm in the soil under the cullet. RCRA toxicity characteristic leaching procedure (TCLP) disposal analysis indicated the waste oil to be a RCRA hazardous waste for cadmium (D006), lead (D008), mercury (D009), and pyridine (D038). Initial RCRA TCLP disposal analysis of contaminated soil indicated the contaminated soil to be a RCRA waste for benzene (D018), carbon tetrachloride (D019), chloroform (D022), 1,2-dichloroethane (D028), and trichloroethene (D040). The contaminated soil was stabilized with cement kiln dust due to high liquid content. The stabilized soil was re-characterized in November 1998 and found to be RCRA non-hazardous.

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**5.3 Disposal Methods and Quantities Removed**

Date Transferred from Site	Waste & Disposal Method	Quantity	State Manifest #	Transport Company	Disposal Facility
9/14/98	Hazardous oil: Incineration	5292 gal.	00001	Ross Transportation 36790 Giles Road Grafton, OH 44044 (440) 748-2171	Ross Incineration 36790 Giles Road Grafton, OH 44044 (440) 748-2171
9/14/98	Hazardous oil: Incineration	4971 gal.	00001	Ross Transportation 36790 Giles Road Grafton, OH 44044 (440) 748-2171	Ross Incineration 36790 Giles Road Grafton, OH 44044 (440) 748-2171
10/29/98	Hazardous oil: Incineration	150 gal.	00002	Freehold Cartage P.O. Box 5010 Freehold, NJ 07728 (732) 462-1001	Ross Incineration 36790 Giles Road Grafton, OH 44044 (440) 748-2171
12/17/98	Non-hazardous stabilized soil: Landfill	521.4 tons	01061-01086	Mineral Transportation P.O. Box 313 Fairmont, WV 26554 (304) 366-0499	Waste Management, Inc. Meadowfill Landfill Bridgeport, WV 26330 (304) 842-2784

**6.0 CHRONOLOGY OF EVENTS**

**7 April 1998**

While overseeing the containment of a coal tar spill at the Sharon Steel Superfund Site, WVDEP Hando requested that OSC Dodd investigate two excavated pits containing used oil and glass cullet on the Big Johns Salvage Site - Hoult Road immediately adjacent to the Sharon Steel Superfund Site.

**24 April 1998**

OSC Dodd met the property owner, John Morgan, WVDEP, and WVDNR representatives, City of Fairmont Building Inspectors, and Fairmont City Police at the site. WVDEP and City of Fairmont officials were concerned with the owner's site activities potentially causing a release of hazardous substances at the site. The owner agreed that no further clearing or debris moving operations be conducted until EPA had time to assess the oil pits and the glass cullet area.

**28 April 1998**

OSC Dodd and Office of Regional Counsel (ORC) Isales requested site access for a sampling assessment. Property owner Morgan provided written access to the site on 6 May 1998.

**30 April 1998**

OSC Welsh and CI Richardson met with the owner at the site, discussed the owner's potential liability under OPA and CERCLA and gathered background information on the release of oil into

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the waste pits. OSC Welsh recommended that the owner make temporary repairs to the oil pits to prevent release of the oil materials.

**6 May 1998**

PRP Morgan gave the OSC permission to access the property for sampling.

**8 May 1998**

The OSC met with SATA at the site to conduct a sampling assessment. The OSC requested a total of 14 samples: composite samples from each oil pit, four soil samples from areas down gradient of the two pits, one water sample below the waste oil pits, four soil samples lateral and down gradient from the glass cullet, and a water sample from a retention pond down gradient of the glass cullet. The OSC also requested two additional samples for waste profile analysis; one from a grayish-white solid of unknown origin and a second sample of what appeared to be coal tar from a seep area.

**11 May 1998**

WVDEP Hando provided the OSC with a copy of analytical data from the two oil pits. Data indicated that the waste material was a mixture of waste oil and diesel fuel. Based upon visual observations of the condition of the waste pits and their proximity to an unnamed tributary of the Monongahela River, the OSC determined that immediate removal actions to mitigate the threats posed by the potential release of the oil was necessary under OPA 1990.

OSC Dodd further discussed the site with Enforcement OSC Welsh, CI Richardson, Enforcement Chief Melvin, and ORC Isales. OSC Welsh sent the property owner with a Clean Water Act 311C order to contain and characterize the oil for proper disposal.

OSC Dodd contacted USCG 2<sup>nd</sup> District to obtain OPA funding and received \$10,000 for administrative activities, under FPN 088-155. Additional funding would be activated if the owner did not respond to the order.

OSC Dodd mobilized to the site this day after being notified by WVDEP Hando and OSC Welsh that the owner was on site and attempting to pump the oil into 55-gallon drums. The owner was not present when the OSC arrived on site. Mr. Morgan was contacted via telephone by OSC Dodd, OSC Welsh, ORC Isales, and the owner's legal counsel to discuss the actions necessary to mitigate the threat. The owner was verbally notified of his liability under CWA/OPA to clean up the released materials on site. OSC Dodd further explained all pumping and containment measures that were required and that samples would be necessary to characterize the waste. The OSC further specified that the work needed to be completed within a week's time frame by a qualified cleanup firm and that EPA needed to be informed of the date of the cleanup in order to provide site oversight. Following denial of responsibility for the cleanup by PRP Morgan, OSC Dodd contracted ERRS (IT Corp.) to conduct the cleanup at the site.

**20 May 1998**

EPA OSCs Dodd and Matlock arrived on site to discuss the work plan developed by ERRS for containment of oil from two waste pits and stabilization of saturated soils removed from the site. ERRS personnel were on site and began pumping operations. The contaminated oil was pumped

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into a 21,000-gallon frac tank staged up gradient from the waste pits. ERRS also constructed an underflow dam down gradient from the pits to prevent any runoff problems. SATA received verbal analytical results indicating that the oil from pit one was highly degraded motor oil and the material in pit two was a mixture of water and waste antifreeze.

**21 May 1998**

ERRS completed pumping operations from the second pit and started to stabilize the saturated soils. ERRS Response Manager (RM) Bahuriak requested that OSC Dodd consider using fly ash or portland cement to assist in the stabilization and solidification of the contaminated soil. OSC Dodd contacted Environmental Response Team (ERT) about the matter and they suggested that the OSC not add fly ash or portland cement until further analytical results were obtained and a disposal option was identified. ERRS used surrounding soil from the pit walls and soils up gradient from the pits, and then capped the combined waste with native soil and covered the remaining pit area with polyethylene sheeting. ERRS collected approximately 12,000 gallons of contaminated oil and antifreeze waste. All liquid wastes were stored in a frac tank located on site and samples of the waste oils and soils were collected for disposal characterization. All personnel demobilized from site pending transportation and disposal (T&D) arrangements.

**23 July 1998**

EPA continued preparations for the T&D of contaminated waste at the site. OSC Dodd contacted the USCG 2<sup>nd</sup> district and obtained an additional \$15,000 under FPN 088-155 to continue removal actions and include T&D of the waste oil from the waste pits. OSC Dodd contacted WVDEP representative Stan Moskal to update him on current actions and the anticipated T&D schedule.

**10 August 1998**

The analytical data received from the waste pits and soil on site indicated the presence of several CERCLA hazardous substances and therefore, the OSC determined that CERCLA funding was more appropriate to address the remaining removal activities. The OSC drafted POLREP #6 - Special Bulletin A to address this matter, emphasizing that approximately 12,000 gallons of waste oil containing lead, cadmium, mercury and pyridine were located in two waste pits immediately adjacent and upgradient of an unnamed tributary to the Monongahela River. The OSC activated \$200,000 in CERCLA funding (\$150,000 for ERRS services and \$50,000 in administrative/technical support) to continue removal actions at the site.

**14 September 1998**

EPA, SATA and ERRS personnel mobilized to the site to continue T&D operations. SATA conducted air monitoring in the frac tank prior to pumping activities for T&D. Initial readings in the tank revealed 0% LEL methane, 50-60 ppm volatile organics, and 0.84 mg/m<sup>3</sup> mercury. Breathing zone readings outside the frac tank were 0% LEL methane, 5-10 ppm volatile organics, and 0.025 mg/m<sup>3</sup> mercury. Pumping operations were conducted outside the frac tank in Level C PPE. OSC Dodd updated two reporters from the WV Times in Fairmont, WV, on site activities and escorted them on a site tour. ERRS completed vacuuming operations of the liquid waste into two trucks staged outside of the hot zone. A total of 10,263 gallons of waste oil were collected and sent off for T&D.

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**16 September 1998**

ERRS completed removal of excess waste from the frac tank by pumping the material into 55-gallon drums. ERRS then pressure washed the tank and stored the decontamination water in 55-gallon drums. SATA conducted air monitoring during these operations. Initial readings in the tank revealed 0% LEL methane, 3.0 ppm volatile organics, and 0.886 mg/m<sup>3</sup> mercury. Breathing zone air outside the tank was monitored to be 0% LEL methane, 0-3 ppm volatile organics, and 0.003-0.008 mg/m<sup>3</sup> mercury. Decontamination activities were conducted outside the frac tank in Level C PPE. Approximately 160 gallons of excess waste oil and decontamination water were staged on site in three drums for future disposal.

**9 November 1998**

All parties mobilized to the site to start soil solidification actions. After a brief safety meeting, ERRS prepared the saturated soils by sifting the soil with an excavator. SATA monitored the air for organic vapors and mercury. Levels remained well below action levels throughout the day's activities. At approximately 0945 hours, a hopper truck filled with kiln dust arrived. The kiln dust was mixed into the saturated materials to remove excess moisture and to solidify the soil for disposal. A polyethylene liner was used to control dust emissions during mixing activities. A sample of the stabilized soil was collected for RCRA characterization. ERRS then covered the area with polyethylene to allow the material to solidify.

**17 December 1998**

ERRS loaded 521 tons of non-hazardous stabilized soils and wood debris from the site. The stabilized soil and debris were transported to Meadowfill Landfill in Bridgeport, WV for disposal. Air monitoring conducted by SATA throughout the day indicated that no organic or mercury vapors existed in the breathing zones throughout the day's activities. ERRS completed equipment decontamination, site grading, and restoration activities at the site. All personnel and equipment were demobilized from the site.

**7.0 PROBLEMS ENCOUNTERED AND RECOMMENDATIONS**

Analytical results for RCRA characterization of the waste oils and contaminated soils indicated that the materials were RCRA hazardous. USCG NPFC indicated that since CERCLA hazardous substances were present in the waste oil and soils, OPA funding could no longer be used to fund actions at the site, necessitating activation of CERCLA funds to complete the action. Furthermore, USCG NPFC indicated that all OPA funds expended would need to be reimbursed for the action. OSC Dodd brought this to the attention of EPA Region III management and EPA Headquarters' Oil Program personnel. No resolution to this issue had occurred at the time of this report.

Other potential threats at the site, including the glass cullet pile and coal tar seeps, require additional assessment. EPA Region III's Pre-Remedial Section is currently conducting a site investigation of the site to determine if the site qualifies for listing on the National Priorities List.

**Federal On-Scene Coordinator's After Action Report  
Big Johns Salvage Site - Hoult Road**

**APPENDICES**

**AR001204**



**Federal On-Scene Coordinator's After Action Report  
Big Johns Salvage Site - Hoult Road**

**APPENDIX A  
SITE LOCATION MAP**

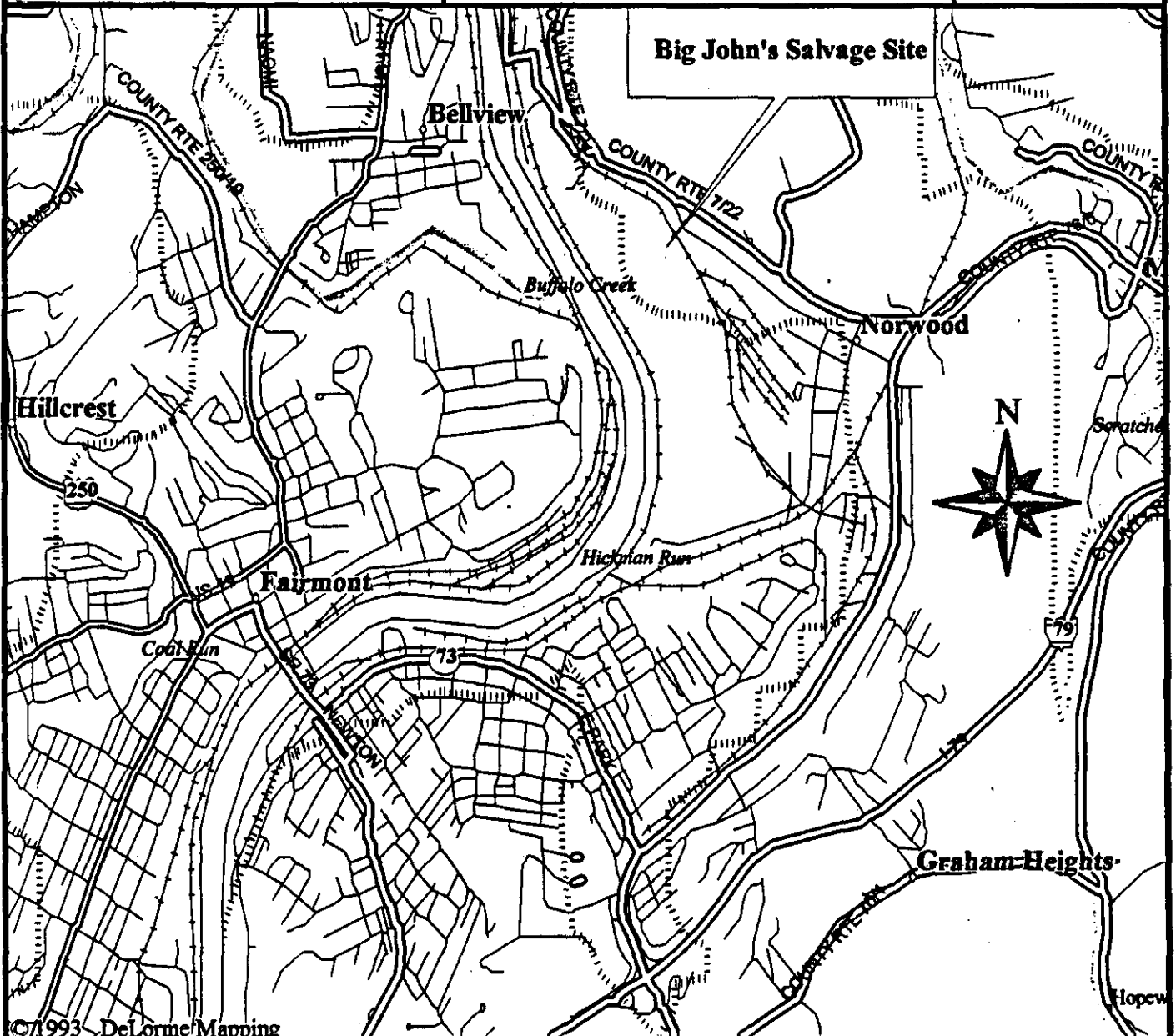
AR001205



FEDERAL  
PROGRAMS  
DIVISION

Big John's Salvage Site  
Fairmont, Marion County, WV

TDD#: 9901-106  
PCS#: 5106



©1993 DeLorme Mapping

NOT TO SCALE

Site Location Map

AR001206

**Federal On-Scene Coordinator's After Action Report  
Big Johns Salvage Site - Hoult Road**

**APPENDIX B  
FUNDING DOCUMENTS**

AR001207

POLREP #1  
BIG JOHNS SALVAGE - HOULT ROAD  
FPN #088-155  
HOULT ROAD  
FAIRMONT, MARION COUNTY, WV  
ATTN: RRC, CHARLIE KLEEMAN, KAREN MELVIN  
EVENT: SAMPLE ASSESSMENT OF OIL PITS AND GLASS CULLET AREA  
OPA ACTIVATION

- I. SITUATION (MONDAY, 08 MAY 1998, 1700 HOURS)
  - A. DURING THE CONTAINMENT OF A COAL TAR SPILL AT THE ADJACENT SHARON STEEL PROPERTY ON 07 APRIL 1998, WVDEP RCRA INSPECTOR JOHN HANDO REQUESTED THAT EPA INVESTIGATE TWO EXCAVATED PITS CONTAINING USED OIL AND GLASS CULLET PILE AT THE BIG JOHN'S PROPERTY. BIG JOHN'S SALVAGE SITE - HOULT RD WAS THE SITE OF A REMOVAL BRANCH DRUM CLEAN UP IN THE FALL OF 1992 DIRECTED BY OSC STEUTEVILLE AND A PRP REMOVAL OF A COAL TAR SPILL IN 1983 UNDER OSC SASSEEN. HISTORICAL INFORMATION RELATED TO THE SITE INDICATES THAT COAL TAR IS PRESENT AT SHALLOW DEPTHS BELOW THE GROUND SURFACE. WVDEP INDICATED THAT THE CULLET PILE IS A HAZARDOUS WASTE FOR LEAD.
  - B. A DEED SEARCH REVEALED THAT THE PROPERTY WAS PURCHASED BY STEEL FABRICATORS INC. IN NOVEMBER, 1997.
  - C. OSC DODD MET WITH THE OWNER, JOHN MORGAN, OF HUNDRED, WEST VIRGINIA, WVDEP, WVDNR, CITY OF FAIRMONT BUILDING INSPECTORS, AND FAIRMONT CITY POLICE AT THE SITE ON 24 APRIL 1998. WVDEP AND CITY OF FAIRMONT OFFICIALS WERE CONCERNED WITH THE NEW OWNERS SITE ACTIVITIES POTENTIALLY CAUSING A RELEASE AND EXPOSURE TO POSSIBLE HAZARDOUS SUBSTANCES AT THE SITE. THE OWNER AGREED THAT NO FURTHER CLEARING OR DEBRIS MOVING OPERATIONS BE CONDUCTED UNTIL THE EPA HAD TIME TO ASSESS THE OIL PITS AND THE GLASS CULLET AREA ON SITE.
  - D. OSC DODD AND ORC ISALES COORDINATED ACCESS TO THE SITE TO CONDUCT A SAMPLING ASSESSMENT. THE CURRENT OWNER, JOHN MORGAN, PROVIDED WRITTEN ACCESS TO THE SITE ON OR ABOUT 06 MAY 1998.
  - E. OSC WELSH AND CI RICHARDSON MET WITH THE OWNER, JOHN MORGAN AT THE SITE ON 30 APRIL 1998. TOPICS DISCUSSED WERE THE OWNER'S POTENTIAL LIABILITY UNDER CERCLA AND TO GATHER BACKGROUND INFORMATION ON THE RELEASE OF OIL INTO THE WASTE PITS AND SITE ACTIVITIES. OSC WELSH NOTED SEVERAL AREAS ON THE SITE WHERE COAL TAR WAS SEEPING ONTO HE GROUND SURFACE. OSC WELSH RECOMMENDED THAT THE OWNER

AR001208

MAKE TEMPORARY REPAIRS TO OIL PITS TO PREVENT RELEASE OF THE OIL MATERIALS.

- F. PERSONNEL ON SITE: OSC-1, SATA-2.
- G. WEATHER: CLOUDY, TEMP IN THE LOW 60'S.

## II ACTIONS TAKEN

FRIDAY, 08 MAY 1998.

- A. AT 1530 HOURS, THE OSC AND SATA SURVEYED THE BIG JOHNS SITE TO DETERMINE IDEAL SAMPLE LOCATIONS AROUND THE TWO OIL PITS AND THE GLASS CULLET AREA. THE OSC REQUESTED THAT TWO OIL SAMPLES BE TAKEN(ONE FROM EACH PIT) AND FOUR SOIL SAMPLES BE COLLECTED PREDOMINATELY FROM AREAS DOWNGRADIENT OF THE TWO PITS. ONE ADDITIONAL WATER SAMPLE WAS COLLECTED FROM A RUNOFF AREA LATERAL BUT DOWNGRADIENT OF THE PITS. A COMPOSITE SAMPLE WAS COLLECTED FROM THE GLASS CULLET AREA ON SITE AND FOUR ADDITIONAL SOIL SAMPLES WERE COLLECTED FROM AREAS LATERAL TO AND DOWNGRADIENT FROM THE GLASS CULLET AREA. IN ADDITION, A WATER SAMPLE WAS COLLECTED FROM A RETENTION POND DOWNGRADIENT OF THE GLASS CULLET AREA.
- B. THE OSC ALSO REQUESTED THAT TWO ADDITIONAL AREAS BE SAMPLED FOR WASTE PROFILE ANALYSIS; ONE AREA CONTAINED A GRAYISH-WHITE SOLID OF UNKNOWN ORIGIN, AND A SECOND AREA CONTAINED WHAT APPEARS TO BE COAL TAR SEEPING ONTO GROUND SURFACE.
- C. THE OILY MATERIAL IN THE WASTE PITS WERE FOUND TO BE LOCATED ON THE BOTTOM OF THE WASTE PITS, I.E., THE WASTE IS HEAVIER THAN WATER. SEVERAL GROUND SURFACE SEEPS OF WHAT APPEARED TO BE COAL TAR WERE PRESENT NEAR THE WASTE PITS AND IN A AREA ADJACENT TO THE WASTE PITS WHERE APPARENT RECENT GROUND CLEARING ACTIVITIES HAD TAKEN PLACE. THE GLASS CULLET WAS OBSERVED TO BE SPREAD OUT OVER AN AREA APPROXIMATELY 1 ACRE IN SIZE. RECENT VEHICLE TRACK MARKS WERE APPARENT IN THE CULLET AREA AND. ACCORDING TO WVDEP THE CULLET HAD BEEN PILED INTO ONE PILE HAS NOW BEEN SPREAD OVER ABOUT AN AREA 1 ACRE IN SIZE.
- D. THE OSC DEPARTED THE SITE AT 1915 HOURS. SATA DEPARTED AT 2000 HOURS.

MONDAY, 11 MAY 1998

- E. WVDEP HANDO PROVIDED A COPY OF ANALYTICAL DATA FROM SAMPLES COLLECTED FROM THE 2 WASTE PITS. THE DATA INDICATED THAT THE WASTE MATERIALS WERE A MIXTURE OF WASTE OIL AND DIESEL FUEL.
- F. BASED UPON VISUAL OBSERVATIONS OF THE CONDITION (LESS THAN 1-2 FEET FREEBOARD, UNCOMPACTED FILL MATERIAL) AND

AR001209

LOCATION OF THE 2 WASTE PITS (THE PITS ARE LOCATED IMMEDIATELY ABOVE AN UNNAMED TRIBUTARY WHICH LEADS TO THE MONONGAHELA RIVER), OSC DODD DETERMINED THAT IMMEDIATE REMOVAL ACTIONS TO MITIGATE THE THREATS POSED BY THE POTENTIAL RELEASE OF THE OIL WAS NECESSARY UNDER OPA 1990.

- G. THE OSC FURTHER DISCUSSED THE SITE WITH ENFORCEMENT OSC WELSH, CI RICHARDSON, ENFORCEMENT CHIEF MELVIN AND ORC ISALES THIS DATE. OSC WELSH WILL SERVE THE PROPERTY OWNER WITH A CLEAN WATER ACT 311C ORDER TO PUMP OUT AND CONTAIN THE OIL FROM THE TWO PITS AND TO HAVE THE OIL FROM EACH OF THE PITS CHARACTERIZED FOR PROPER DISPOSAL. THE WASTE MATERIALS WILL BE STAGED ON-SITE UNTIL THEY ARE PROPERLY CHARACTERIZED FOR DISPOSAL.
- H. THE OSC CONTACTED USCG 2ND DISTRICT TO OBTAIN OPA FUNDING TO RESPOND TO THE POSSIBLE RELEASE. THE OSC OBTAINED FPN NO.088-155 IN THE AMOUNT OF \$10,000 FOR ADMINISTRATIVE ACTIVITIES. IF THE OWNERS DO NOT RESPOND TO THE ORDER IN A TIMELY MANNER OSC DODD IS PREPARED TO ACTIVATE ADDITIONAL FUNDING TO CONTAIN THE OIL ON SITE.
- I. OSC DODD MOBED TO THE SITE UPON RECEIVING NOTIFICATION FROM WVDEP HANDO AND OSC WELSH THAT THE CURRENT OWNER WAS ONSITE THIS DATE AND WAS REPORTEDLY ACTIVELY TRYING TO GATHER 55 GAL DRUMS TO PUMP THE WASTE MATERIAL OUT OF THE PITS FOR TEMPORARY STORAGE. THE OWNER WAS NOT PRESENT. THE OWNER WAS CONTACTED VIA TELEPHONE WITH OSC DODD, OSC WELSH, ORC ISALES AND THE OWNER'S LEGAL COUNSEL TO DISCUSS THE REMOVAL ACTIONS NECESSARY TO MITIGATE THE THREAT POSED BY THE MATERIALS IN THE WASTE PITS. THE OWNER WAS VERBALLY NOTIFIED OF HIS LIABILITY UNDER CWA/OPA TO CLEAN UP THE RELEASED MATERIALS ON THE SITE. OSC DODD DISCUSSED THE IMMEDIATE MEASURES NEEDED TO BE TAKEN BY THE OWNER, I.E., PUMP OUT THE WASTE PITS INTO A TEMPORARY HOLDING TANK ON-SITE AND COLLECT SAMPLES FOR DISPOSAL CHARACTERIZATION. OSC DODD FURTHER SPECIFIED THAT THE WORK NEEDED TO BE COMPLETED WITHIN A WEEK'S TIMEFRAME, THE WORK MUST BE DONE BY A QUALIFIED INDIVIDUAL OR FIRM AND THAT THE EPA MUST BE NOTIFIED ASAP BUT PRIOR TO THE REMOVAL ACTIVITIES SO THAT EPA CAN PROVIDE OVERSIGHT. THE OWNER WAS ALSO NOTIFIED THAT A WRITTEN 311C ORDER WOULD ALSO BE SENT TO HIM IN THE NEXT COUPLE OF DAYS.
- J. DUE TO OSC WELSH'S UNAVAILABILITY THE NEXT FEW WEEKS, ENFORCEMENT ACTIVITIES WILL BE THE RESPONSIBILITY OF OSC MATLOCK.

AR001210

II FUTURE PLANS

- A. OSC DODD TO COORDINATE ISSUING OF THE 311C ORDER WITH OSC WELSH/MATLOCK. IF THE OWNERS DO NOT COMPLY, THE OSC WILL ACTIVATE FURTHER OPA FUNDS TO CONTAIN THE OIL ON SITE AND ARRANGE FOR SUITABLE T&D.
- B. OSC DODD WILL REVIEW THE ASSESSMENT ANALYTICAL UPON RECEIPT FOR POSSIBLE ADDITIONAL REMOVAL ACTIONS.
- C. OSC DODD TO CONTINUE COORDINATION OF SITE ACTIVITIES WITH USCG, STATE AND LOCAL OFFICIALS.

JEFF DODD, OSC  
US EPA REGION III  
WHEELING, WV

AR001211

POLREP # 6 - SPECIAL BULLETIN A  
BIG JOHN'S SALVAGE - HOULT ROAD  
FAIRMONT, MARION COUNTY, WV

ATTN: REGIONAL RESPONSE CENTER, U.S. EPA REGION III

DATE: 10 AUGUST 1998

FROM: JEFFREY A. DODD, OSC EPA REGION III  
REMOVAL RESPONSE SECTION (3HS31)

THRU: KATHY HODGKISS, ACTING DEPUTY DIRECTOR  
HAZARDOUS SITE CLEANUP DIVISION

THRU: DENNIS P. CARNEY, CHIEF  
REMOVAL BRANCH (3HS30)

THRU: CHARLES KLEEMAN, CHIEF  
REMOVAL RESPONSE SECTION (3HS31)

SUBJECT: NOTIFICATION OF \$200,000 ACTIVATION AT THE BIG JOHNS SALVAGE  
SITE, FAIRMONT, MARION COUNTY, WV

I. SITUATION (MONDAY, 10 AUGUST 1998)

- A. ON 07 APRIL 1998, WVDEP RCRA INSPECTOR JOHN HANDO REQUESTED THAT EPA INVESTIGATE TWO EXCAVATED PITS CONTAINING USED OIL AT THE BIG JOHN'S PROPERTY. (THE BIG JOHN'S SALVAGE YARD WAS THE SITE OF A REMOVAL BRANCH DRUM CLEAN UP IN THE FALL OF 1992 DIRECTED BY OSC STEUTEVILLE AND A PRP REMOVAL ACTION IN THE EARLY 1980'S TO ADDRESS A RELEASE OF COAL TAR).
- B. A DEED SEARCH REVEALED THAT THE PROPERTY WAS PURCHASED BY STEEL FABRICATORS INC. IN NOVEMBER, 1997.
- C. CURRENT OWNER DECLINED TO TAKE RESPONSIBILITY FOR WASTE MATERIALS IN THE TWO WASTE PITS. OSC OPENED FPN NO. 088-155 ON 11 MAY 1998 FOR \$10,000 TO RESPOND TO IMMINENT AND SUBSTANTIAL THREAT OF RELEASE OF REPORTED WASTE OILS INTO UNNAMED TRIBUTARY TO THE MONONGAHELA RIVER.
- D. OSC DODD CONTACTED USCG 2<sup>ND</sup> DISTRICT ON 15 MAY 1998 AND OBTAINED AN ADDITIONAL \$20,000 UNDER FPN NO. 088-155 FOR REMOVAL CONTRACTOR SUPPORT TO MITIGATE THREAT OF RELEASE OF OIL FROM WASTE PITS INTO UNNAMED TRIB TO MONONGAHELA RIVER.
- E. ON 20 AND 21 MAY 1998, ERRS PUMPED OUT AND TEMPORARILY STAGED APPROXIMATELY 12,000 GALLONS OF SUSPECTED

AR001212



CONTAMINATED OIL AND ANTI-FREEZE FROM THE TWO PITS ON SITE AND STABILIZED THE CONTAMINATED SOIL TO THE DEGREE POSSIBLE. SAMPLES OF WASTE OIL/WATER AND SOILS WERE COLLECTED FOR DISPOSAL AND HAZARDOUS SUBSTANCE CHARACTERIZATION.

- F. OSC DODD CONTACTED USCG 2<sup>ND</sup> DISTRICT ON 23 JULY 1998 AND OBTAINED AN ADDITIONAL \$15,000 UNDER FPN NO. 088-155 FOR TRANSPORTATION AND DISPOSAL OF WASTE OIL/WATER AND CONTAMINATED SOIL.
- G. REVIEW OF ANALYTICAL DATA INDICATES THE PRESENCE OF SEVERAL CERCLA HAZARDOUS SUBSTANCES IN BOTH WASTE OIL AND CONTAMINATED SOIL. MAXIMUM CONCENTRATIONS OF MERCURY (400 PPM), METHYLENE CHLORIDE (1100 PPM), 1,1,1-TRICHLOROETHANE (110 PPM), CARBON TETRACHLORIDE (15 PPM), NAPHTHALENE (270 PPM), AND NUMEROUS PAHs IN THE HUNDREDS OF PPM RANGE WERE FOUND IN THE WASTE OIL. RCRA TCLP DISPOSAL ANALYSIS INDICATED THE WASTE OIL TO BE A RCRA HAZARDOUS WASTE FOR CADMIUM (D006), LEAD (D008), MERCURY (D009), AND PYRIDINE (D038). RCRA TCLP DISPOSAL ANALYSIS OF CONTAMINATED SOIL INDICATED THE CONTAMINATED SOIL TO BE A RCRA WASTE FOR BENZENE (D018), CARBON TETRACHLORIDE (D019), CHLOROFORM (D022), 1,2-DICHLOROETHANE (D028), AND TRICHLOROETHENE (D040).

## II ACTIONS TAKEN

- A. DUE TO PRESENCE OF CERCLA HAZARDOUS SUBSTANCES PRESENT IN WASTE OIL AND CONTAMINATED SOIL, OSC DETERMINED THAT CERCLA FUNDING IS MORE APPROPRIATE TO FUND REMAINING REMOVAL ACTION ACTIVITIES AT SITE.
- B. MERCURY (D009), LEAD (D008), CADMIUM (D006), PYRIDINE (D038), BENZENE (D018), METHYLENE CHLORIDE, 1,1,1-TRICHLOROETHANE, CARBON TETRACHLORIDE (D019), CHLOROFORM (D022), 1,2-DICHLOROETHANE (D028), TRICHLOROETHENE (D040), AND NAPHTHALENE ARE LISTED AS HAZARDOUS SUBSTANCES IN THE NCP AT 40CFR304.2.
- C. INITIAL AND CURRENT SITE CONDITIONS MEET FACTORS LISTED IN SECTION 300.415 OF THE NCP TO BE CONSIDERED IN DETERMINING APPROPRIATENESS OF A REMOVAL ACTION AS FOLLOWS:
  - 1. 300.415 (b) (2)(I) "ACTUAL OR POTENTIAL EXPOSURE TO NEARBY HUMAN POPULATIONS, ANIMALS, OR THE FOOD CHAIN FROM HAZARDOUS SUBSTANCES OR POLLUTANTS OR CONTAMINANTS"

APPROXIMATELY 12,000 GALLONS OF WASTE OIL CONTAINING LEAD, CADMIUM, MERCURY AND PYRIDINE WERE LOCATED

AR001213

IN 2 UNLINED/UNCOMPACTED WASTE PITS IMMEDIATELY ADJACENT AND UPGRADIENT OF AN UNNAMED TRIBUTARY TO THE MONONGAHELA RIVER. ACCESS TO THE SITE WAS UNCONTROLLED ALLOWING THE POTENTIAL FOR DIRECT CONTACT WITH THESE HAZARDOUS SUBSTANCES. SOILS IN CONTACT WITH THE CONTAMINATED WASTE OIL USED FOR THE WASTE PITS WERE CONSOLIDATED ON-SITE AND ALSO SAMPLED FOR SUBSEQUENT DISPOSAL. ANALYTICAL DATA INDICATES THE CONTAMINATED SOILS ARE RCRA HAZARDOUS WASTE CONTAINING BENZENE, CARBON TETRACHLORIDE, CHLOROFORM, 1,2-DICHLOROETHANE AND TRICHLOROETHANE. THE PRESENCE OF THESE HAZARDOUS SUBSTANCES IN THE SOILS PRESENTS A DIRECT CONTACT THREAT.

2. 300.415 (b)(2)(ii) "ACTUAL OR POTENTIAL CONTAMINATION OF DRINKING WATER SUPPLIES OR SENSITIVE ECOSYSTEMS"

INITIAL SITE CONDITIONS PRESENTED AN IMMINENT POTENTIAL FOR THE RELEASE OF THE WASTE OIL CONTAINING HAZARDOUS SUBSTANCES TO THE MONONGAHELA RIVER, A DRINKING WATER SOURCE. THE WASTE PITS WERE UNLINED/UNCOMPACTED WITH LESS THAN 2 FEET OF FREEBOARD. THE SITUATION WAS STABILIZED UNDER OPA FUNDING BY PUMPING THE CONTAMINATED WASTE OIL INTO A TEMPORARY HOLDING TANK ON-SITE AND SAMPLED FOR SUBSEQUENT DISPOSAL. CONTINUED REMOVAL ACTION IS NECESSARY TO COMPLETE MITIGATION OF THREATS POSED BY HAZARDOUS SUBSTANCES IN THE WASTE OIL AND SOILS.

3. 300.415 (b)(2)(iv) "HIGH LEVELS OF HAZARDOUS SUBSTANCES, POLLUTANTS OR CONTAMINANTS IN SOILS LARGELY AT OR NEAR THE SURFACE, THAT MAY MIGRATE"

SOILS IN CONTACT WITH THE CONTAMINATED WASTE OIL USED FOR THE WASTE PITS WERE CONSOLIDATED ON-SITE PENDING ANALYTICAL CHARACTERIZATION. ANALYTICAL DATA INDICATES THE CONTAMINATED SOILS ARE RCRA HAZARDOUS WASTE CONTAINING BENZENE, CARBON TETRACHLORIDE, CHLOROFORM, 1,2-DICHLOROETHANE AND TRICHLOROETHANE. THE POTENTIAL FOR THE MIGRATION OF THESE HAZARDOUS SUBSTANCES OFFSITE TO THE MONONGAHELA RIVER VIA AN UNNAMED TRIBUTARY IS LIKELY BASED UPON CURRENT SITE CONDITIONS.

4. 300.415 (b) (2) (vii) "THE AVAILABILITY OF OTHER APPROPRIATE FEDERAL OR STATE

MECHANISMS TO RESPOND TO THE  
RELEASE"

WVDEP REQUESTED EPA ASSISTANCE TO ADDRESS THE THREATS POSED BY THE CONTAMINATED WASTE OIL AT THE SITE. THE PRESENCE OF HAZARDOUS SUBSTANCES AS SPECIFIED IN 40CFR302.4 IN THE WASTE OIL AND CONTAMINATED SOIL INDICATES THAT CERCLA FUNDING IS MORE APPROPRIATE THAN CONTINUATION OF AN OPA FUNDED REMOVAL ACTION. CERCLA FUNDING IS NEEDED TO COMPLETE REMOVAL ACTION ACTIVITIES WHICH WERE BEGUN UNDER OPA FUNDING.

- D. THE REMAINING ACTIONS TO BE CONDUCTED AT THE SITE INCLUDE ON-SITE STABILIZATION OF SOILS, OFF-SITE TRANSPORTATION, TREATMENT (IF NECESSARY), AND DISPOSAL OF APPROXIMATELY 12,000 GALLONS OF WASTE OIL AND CONTAMINATED SOIL CONTAINING HAZARDOUS SUBSTANCES. IN ADDITION, IT WILL BE NECESSARY TO STABILIZE THE FORMER WASTE PIT AREA OF THE SITE AND DECONTAMINATE THE STORAGE TANK AND OTHER RESPONSE EQUIPMENT UPON COMPLETION OF TRANSPORTATION AND DISPOSAL ACTIVITIES.
- E. THE CONDITIONS AT THE BIG JOHNS SALVAGE SITE MEET THE CONDITIONS SET FORTH IN SECTION 400.415 OF THE NCP FOR A REMOVAL ACTION. THE OSC HAS INITIATED CERCLA FUNDING FOR THIS REMOVAL ACTION.
- F. THE ESTIMATED COSTS ARE AS FOLLOWS:
- |                         |           |
|-------------------------|-----------|
| ERRS                    | \$150,000 |
| SATA                    | \$ 15,000 |
| EPA                     | \$ 5,000  |
| UNALLOCATED/CONTINGENCY | \$ 30,000 |

\$200,000

III FUTURE PLANS

- A. OSC TO COORDINATE ISSUANCE OF ERRS DELIVERY ORDER.
- B. ERRS CONTRACTOR TO ARRANGE T&D OF CONTAMINATED WASTE OIL AND SOILS.
- C. ERRS TO DEVELOP TECHNICAL APPROACH AND HASP TO ADDRESS DECONTAMINATION OF TEMPORARY STORAGE TANK.
- C. OSC TO OBTAIN HQ GUIDANCE ON USE OF STABILIZATION MATERIALS.
- D. OSC TO CONTINUE COORDINATION OF SITE ACTIVITIES WITH USCG, STATE AND LOCAL OFFICIALS.

JEFFREY DODD, OSC  
US EPA REGION III  
WHEELING, WV

AR001215

**Federal On-Scene Coordinator's After Action Report  
Big Johns Salvage Site - Hoult Road**

**APPENDIX C  
NEWSPAPER ARTICLES**

AR001216

# Big John finish near

By Jenni Vincent

STAFF WRITER

FAIRMONT — Work is nearly complete to treat two pits at the former Big John Salvage Yard on Hoult Road found to contain waste oil tainted with hazardous materials — including several heavy metals, according to Jeff Dodd, federal on-scene coordinator with the U.S. Environmental Protection Agency.

The EPA was first notified of the potential problem last spring by the state Division of Environmental Protection, according to Dodd, who said the pits' contents were sampled before being excavated.

"We activated in May, under the federal Oil Pollution Act. And at that time, we pumped what the state thought was a mixture of waste oil and water into a tank," Dodd said, adding that the two pits had also been collapsed and covered to prevent them from refilling with rain water.

"However, the materials were hazardous — including lead, cadmium and mercury — as well as pyridine, which is an organic chemical," Dodd said.

Approximately 12,000 gallons of the combination oil, water and sludge will be taken by tanker to a facility in Ohio where it may be incinerated if its Btu content is high enough, Dodd said.

"The mercury in it makes it expensive to dispose of," Dodd said.

Dodd said it has cost between \$15,000 and \$20,000 to do site assessment, pump-

Monday  
October 5, 1998  
Vol. 98, No. 278

# Times West Virginian

## *From the front*

### Clean

Continued from Page 1A

ing the water and related cleanup work.

He estimated that the disposal cost may be as high as \$50,000.

Plans also call for sampling and analyzing the soil from the pits, Dodd said.

"We think there may be some hazardous constituents such as volatile organics there," he said, adding that the site will also be examined to determine if it has any other problems.

EPA is no stranger to the Big John site, however.

During the mid 1980s, EPA conducted a removal response at the

10-acre site in East Fairmont. A total of 4,100 tons of coal-tar waste and 18,500 tons of liquid nonhazardous waste was removed from the site at a cost of approximately \$500,000, according to an EPA fact sheet.

"In 1991, the West Virginia Division of Natural Resources discovered drums and other vessels containing unknown materials that had not been addressed in 1984 and 1985," the EPA fact sheet reads.

As a result, from 1991 to 1993, a total of "129 overpacks of material from 12 waste streams was ultimately disposed of," at a cost of \$695,801, according to EPA information.

AR001217

Wednesday  
May 27, 1998  
Vol. 98, No. 147

# Times West Virginian

## 2 oil spills investigated here

By Jenni Vincent

FAIRMONT — Federal Environmental Protection Agency officials have been working in conjunction with the West Virginia Division of Environmental Protection to clean up two oil spills, one which occurred at the Sharon Steel site and the other at nearby Big John's Salvage.

Jeff Dodd, on-scene coordinator with the EPA's Region 3 Site Cleanup Division in

Wheeling, said both spills were reported by the DEP.

John Hando, inspector specialist with the DEP's Office of Waste Management in Fairmont, said the Sharon Steel spill was discovered during a site visit with company representatives and a survey crew in April.

"We were walking through the property, advising Sharon Steel representatives of potential environmental problems that had occurred in the last 90 days. At that point we discov-

ered a large above-ground tank..." Hando said.

Surrounding the tank was several hundred gallons of a black tar-like liquid, Hando said, a spill which was then reported to and handled by the EPA.

On that same day, Hando and his supervisor, Stan Moskal, also discovered the spill at Big John's Salvage, he said.

"During the property survey with Sharon Steel representatives it was discovered that

Sharon Steel owned a right of way through the Big John's Salvage property," Hando said.

While they were walking the right of way, DEP officials noticed a "sewage-like discharge" and then entered the Big John's Salvage property where they found two large pits filled with an "oily water mixture," Hando said, adding that this discovery was also reported to the EPA.

Since that time, EPA has taken action at both sites,

according to Dodd.

"A large storage tank was apparently brought onto the Sharon Steel site and breached, thereby allowing the contents to flow onto the ground," Dodd said, adding that the discharge had gotten within a foot of a storm drain which flows into an unnamed tributary of the Monongahela River.

Approximately 2,000 gallons of oil were released at this site sometime in mid-April, Dodd estimated.

The now-closed Sharon Steel plant was built in 1920 and was formerly a coke-production facility. It covers approximately 107 acres, of which 57 acres was used for coke plant operations, waste treatment and disposal.

Sharon Steel operated the plant from 1948-79, when the company was forced to close the facility as a result of the Water Act and Clean Air Act suits filed by the EPA.

Please see SPILLS Page 2A

## Spills

Continued from Page 1A

It was later declared to be a Superfund site and the EPA spent several million dollars there in the early 1990s "mitigating imminent and substantial threats at the site," Dodd said.

Samples from last month's spill indicate that mercury — a heavy metal which is a suspected carcinogen — may be present, Dodd said.

Definite plans for removing the contaminated soil and tank should be made within a month, Dodd said.

At the adjoining property, EPA workers have also begun to clean up another oil release which occurred at Big John's Salvage, Dodd said.

Waste oil was released from an old tank, Dodd said. Although two waste pits were dug in an attempt to deal with the oil, they were located on top

of a ravine above an unnamed tributary of the Monongahela River, Dodd said.

A total of approximately 12,000 gallons of waste oil — mixed with some rain water which had accumulated in the two pits — has been recovered, Dodd said.

Since that time, EPA workers have pumped the liquid out of the pits into an on-site storage tank and covered the pits with clean soil and a plastic tarp.

This is only a temporary remedial measure, however, until tests from samples taken at the site are returned.

Characterization sampling, which is done to determine the presence of various chemicals such as polychlorinated biphenyls (PCBs) or metals, has already tentatively shown that the spill consisted of waste oil, Dodd said.

Sampling was done Tuesday to determine if the spill included any hazardous substances above allowable limits, Dodd said.

For example, if lead is found to be in concentrations of greater than five parts per million, the waste would then be considered a hazardous waste, Dodd said.

It will probably be four to six weeks until permanent disposal actions are taken at the site, Dodd said.

A ceiling of \$30,000 has been placed on the site, with less than a third of that amount having been spent to date, Dodd said.

of 1990, both the property owner and the party responsible for the release can be held liable for cleanup costs, Dodd said.

In this case, the EPA is "currently pursuing enforcement actions," Dodd said.

Steel Fabricators Inc., an Erie, Pa., company, currently owns the Big John's Salvage property, according to company secretary/treasurer W.P. "Pete" Lough.

He denied, however, any corporate responsibility for the oil spill.

Lough said that a Morgantown firm which had been hired to help clean up the scrap metal and do some timbering at the site caused the spill.

"When he started to move the tank he busted it... And approximately 1,500 gallons ran out on the ground," said Lough during a telephone interview from his Littleton home.

Two pits had subsequently been dug as a way of containing the liquid, Lough said.

"We saw it (the spill) happen with our own eyes," Lough said.

This site is not new to the EPA since it had previously been placed under the federal Superfund program, Dodd said.

"EPA took two former removal actions at Big John's Salvage. One was in the early 1980s which involved the release of a tank containing coal tar, while the action taken in the 1990s involved the collection and removal of

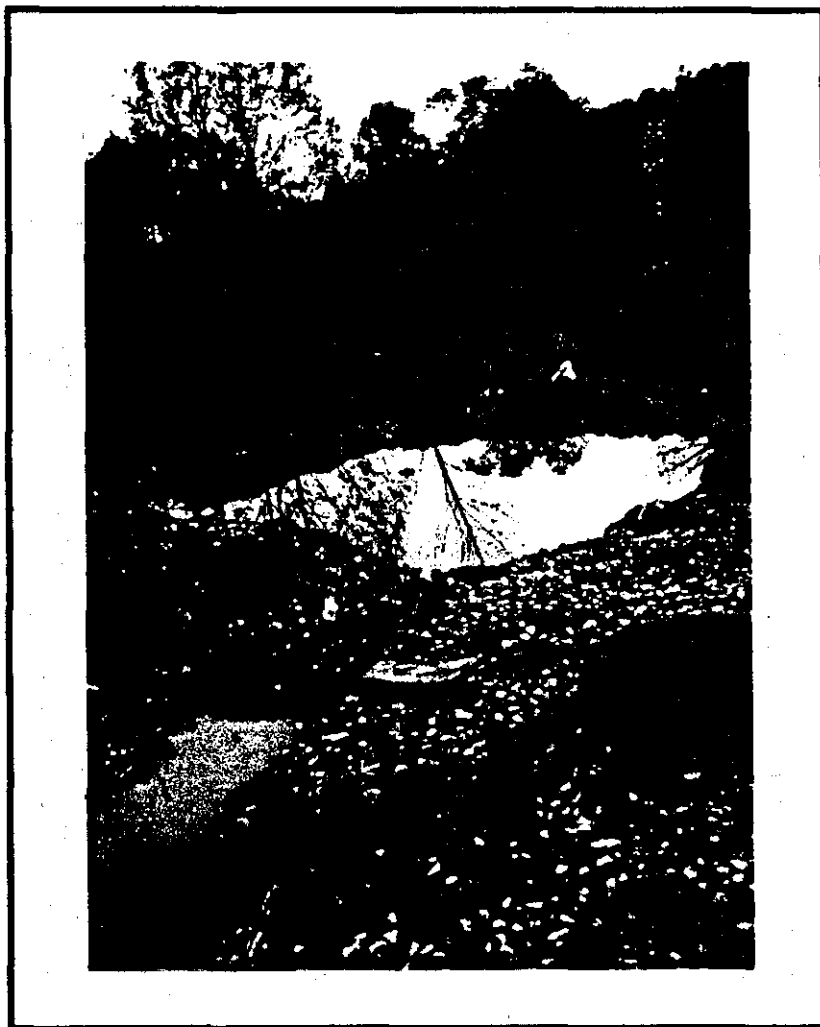
AR001218

**Federal On-Scene Coordinator's After Action Report  
Big Johns Salvage Site - Hoult Road**

**APPENDIX D  
PHOTO DOCUMENTATION**

AR001219

**Big Johns Salvage Site – Hoult Road**



**DATE:** 5 August 1998

**PHOTO BY:** Region III SATA

**DESCRIPTION:** Waste oil pit number two.

AR001220



**Big Johns Salvage Site – Hoult Road**



**DATE:** 9 September 1998

**PHOTO BY:** Region III SATA

**DESCRIPTION:** Air monitoring being conducted during pumping operations.

AR001221

**Big Johns Salvage Site -- Hoult Road**



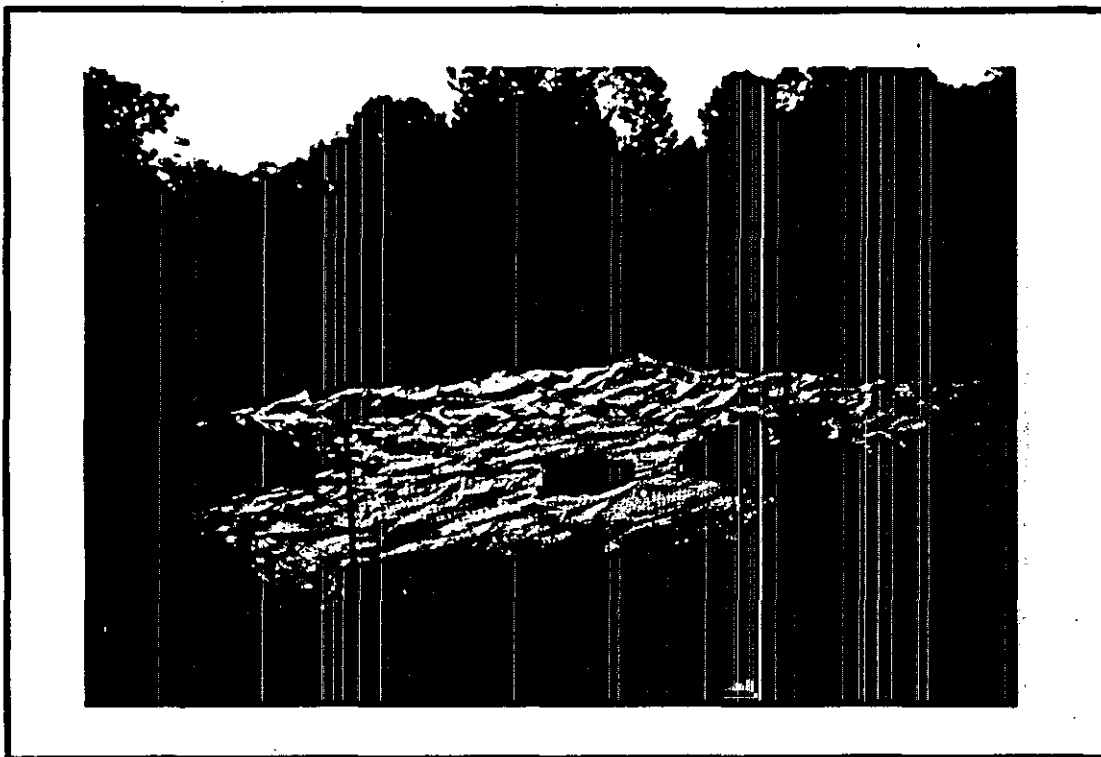
**DATE:** 14 September 1998

**PHOTO BY:** Region III SATA

**DESCRIPTION:** Waste oils being pumped into vac trucks for transport to Disposal facilities.

AR001222

**Big Johns Salvage Site - Hoult Road**



**DATE:** 16 September 1998

**PHOTO BY:** Region III SATA

**DESCRIPTION:** Temporary poly covering on pit number one.

**AR001223**

**Big Johns Salvage Site - Hoult Road**



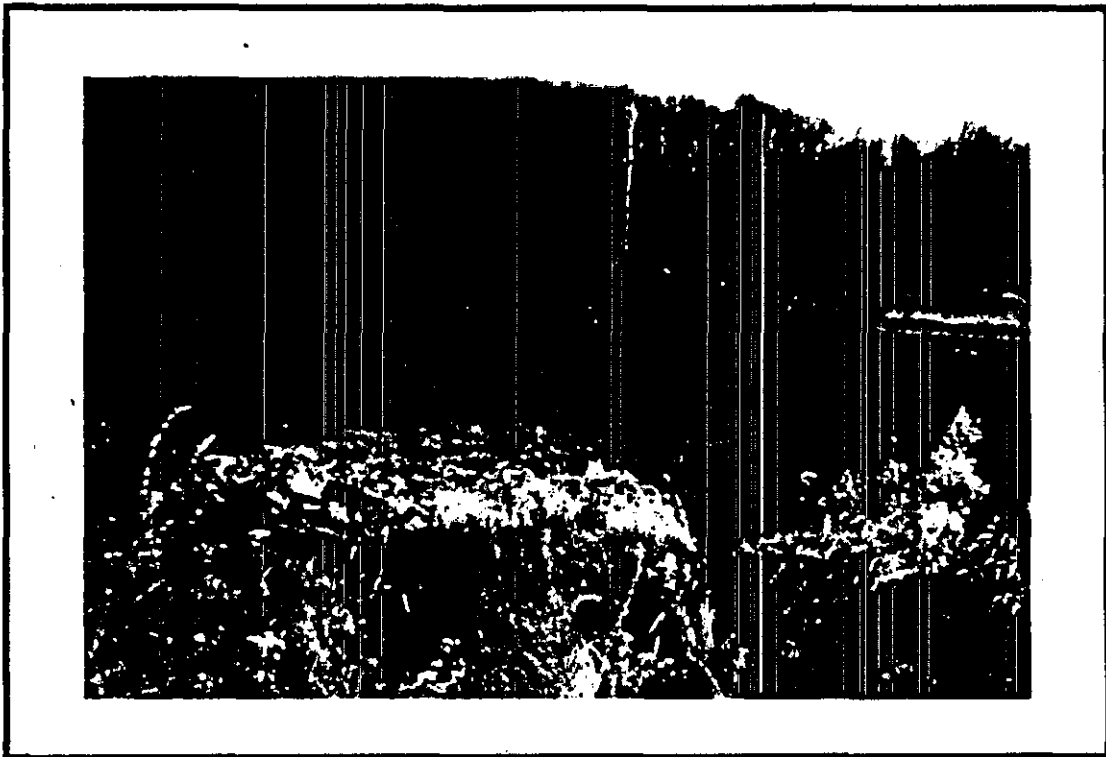
**DATE:** 16 September 1998

**PHOTO BY:** Region III SATA

**DESCRIPTION:** Remainder of sludge from storage tanks transferred into 55-gallon drums.

AR001224

**Big Johns Salvage Site – Hoult Road**



**DATE:** 17 December 1998

**PHOTO BY:** Region III SATA

**DESCRIPTION:** Condition of pit area following removal and restoration operations.

AR001225

**Federal On-Scene Coordinator's After Action Report  
Big Johns Salvage Site - Hoult Road**

**APPENDIX E  
GLOSSARY OF ABBREVIATIONS AND DEFINITIONS**

**AR001226**

**Federal On-Scene Coordinator's After Action Report  
Big Johns Salvage Site - Hoult Road**

**GLOSSARY OF ABBREVIATIONS AND DEFINITIONS**

CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CI	Criminal Investigator
CID	Criminal Investigation Division
CWA	Clean Water Act
ERRS	Emergency Rapid Response Support
FPN	Federal Pollution Number
IT Corp.	International Technology Corporation
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
OPA	Oil Pollution Act
ORC	Office of Regional Counsel
OSC	On-Scene Coordinator
PAHs	Polynuclear Aromatic Hydrocarbons
ppm	parts per million
PRP	Potentially Responsible Party
RCRA	Resource Conservation and Recovery Act
RM	Response Manager
SARA	Superfund Amendments and Reauthorization Act
SATA	Site Assessment Technical Assistance
T&D	Transportation and Disposal
TCLP	Toxicity Characteristic Leaching Procedure
U.S. EPA	United States Environmental Protection Agency
USCG	United States Coast Guard
WVDEP	West Virginia Division of Environmental Protection
WVDNR	West Virginia Department of Natural Resources

AR001227

**POLREP #11 AND FINAL**

**BIG JOHNS SALVAGE - HOULT ROAD**

**FAIRMONT, MARION COUNTY, WEST VIRGINIA 26554**

**ATTN: RRC, CHARLIE KLEEMAN**

**EVENT: CONCLUSION OF REMOVAL ACTION**

**I. SITUATION (1000 HOURS, WEDNESDAY, 14 APRIL 1999)**

- A. REMOVAL AND OFF-SITE DISPOSAL OF APPROXIMATELY 521 TONS OF NON-HAZARDOUS SOIL WAS COMPLETED ON 17 DECEMBER 1998.**
- B. ESTIMATE OF COSTS TO DATE: (AS OF COB 14 APR 99)**  
**OPA FUNDING - FPN NO. 088-155**

	<b>CURRENT</b>	<b>CEILING</b>
<b>ERRS</b>	<b>\$11,792</b>	<b>\$35,000</b>
<b>SATA</b>	<b>\$ 1,181</b>	<b>\$ 8,500</b>
<b>EPA DIRECT</b>	<b>\$ 345</b>	<b>\$ 1,500</b>
	<b>-----</b>	<b>-----</b>
<b>TOTAL</b>	<b>\$13,318</b>	<b>\$45,000</b>

**CERCLA FUNDING**

	<b>CURRENT</b>	<b>CEILING</b>
<b>ERRS</b>	<b>\$ 68,966</b>	<b>150,000</b>
<b>SATA</b>	<b>4,466</b>	<b>15,000</b>
<b>EPA DIRECT</b>	<b>2,640</b>	<b>3,000</b>
<b>EPA INDIRECT</b>	<b>5,632</b>	<b>6,000</b>
<b>UNALLOCATED/CONTINGENCY</b>		<b>26,000</b>

<b>TOTAL</b>	<b>\$ 81,704</b>	<b>200,000</b>
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**NOTE: EPA DIRECT CEILING INCREASED BY \$1,000.**

**II ACTIONS TAKEN**

- A. OSC AFTER ACTION REPORT COMPLETED.**

**III. FUTURE PLANS**

- A. NO FURTHER REMOVAL ACTIVITIES ARE ANTICIPATED AT THIS TIME.**
- B. EPA REGION III PRE-REMEDIAL SECTION TO CONDUCT PA/SI AT SITE TO DETERMINE ELIGIBILITY FOR LISTING SITE ON NPL**

**-----**  
**JEFF DODD, OSC**

**U.S. EPA REGION III**

**WHEELING, WEST VIRGINIA**

**AR001228**



POLREP #10

BIG JOHNS SALVAGE - HOULT ROAD

FAIRMONT, MARION COUNTY, WEST VIRGINIA 26554

ATTN: RRC, CHARLIE KLEEMAN

EVENT: TRANSPORTATION AND DISPOSAL OF STABILIZED WASTE PIT SOILS

I. SITUATION (2200 HOURS, THURSDAY, 17 DECEMBER 1998)

- A. AS A FOLLOW UP TO THE WASTE OIL DISPOSAL ON 16 SEPTEMBER 1998, THE REMAINING WASTE PIT SOILS WERE STABILIZED WITH 12 TONS OF KILN DUST ON 9 NOVEMBER 1998. THE STABILIZED WASTE PIT SOILS WERE SAMPLED FOR RCRA CHARACTERIZATION AND DETERMINED TO BE NOT RCRA HAZARDOUS FOR DISPOSAL. ERRS WAS TAKEN TO ARRANGE FOR TRANSPORTATION AND DISPOSAL OF THE STABILIZED CONTAMINATED NON-HAZARDOUS WASTE PIT SOILS.
- B. PERSONNEL ON SITE: OSC-1, ERRS-5, MINERAL TRUCKING-7, SATA-1.
- C. WEATHER: OCCASIONAL SNOW SHOWERS, TEMP IN LOW 30'S.
- D. ESTIMATE OF COSTS TO DATE: (AS OF COB 21 DEC 98)

	CURRENT	CEILING
ERRS	\$ 69,260	150,000
SATA	3,379	15,000
EPA DIRECT	1,530	3,000
EPA INDIRECT	3,264	5,000
UNALLOCATED/CONTINGENCY		27,000

TOTAL	\$ 77,433	200,000
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NOTE: ERRS COSTS ARE AT 46.2%. SATA COSTS ARE AT 22.5%

II ACTIONS TAKEN

THURSDAY, 17 DECEMBER 1998

- A. 0700 HOURS. ERRS RESPONSE MANAGER MET WITH SATA AT THE SITE AND A TAILGATE SAFETY MEETING WAS HELD. ERRS HAD PREVIOUSLY ARRANGED FOR AN EXCAVATOR AND 550 DOZER TO BE DELIVERED TO THE SITE. ERRS BEGAN SETTING UP FOR THE LOADING OF NON-HAZARDOUS STABILIZED SOILS. OSC ARRIVED ON SITE AT 0800 HOURS.
- B. THROUGHOUT THE DAY, ERRS LOADED APPROXIMATELY 572 TONS (26 TRUCKS) OF STABILIZED SOIL AND WOOD DEBRIS FROM THE FORMER PIT AREA TO THE MEADOWFILL LANDFILL IN BRIDGEPORT, WEST VIRGINIA. AIR MONITORING MEASUREMENTS INDICATED NO ORGANIC OR MERCURY VAPORS DURING LOADING ACTIVITIES.
- C. 1700 HOURS. ERRS COMPLETED EQUIPMENT DECONTAMINATION, SITE GRADING AND RESTORATION ACTIVITIES PRIOR TO DEMOBE.

AR001229

**III. FUTURE PLANS**

- A. NO FURTHER REMOVAL ACTIVITIES ARE ANTICIPATED AT THIS TIME.**

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**JEFF DODD, OSC  
U.S. EPA REGION III  
WHEELING, WEST VIRGINIA**

**AR001230**

POLREP #9

BIG JOHNS SALVAGE YARD - HOULT ROAD

FAIRMONT, MARION COUNTY, WEST VIRGINIA 26554

ATTN: RRC, CHARLIE KLEEMAN, KAREN MELVIN  
EVENT: SOLIDIFICATION OF MIXED PETROLEUM SLUDGE IN WASTE PITS.

- I. SITUATION (1700 HOURS, MONDAY, 9 NOVEMBER 1998)
  - A. CURRENT PROPERTY OWNER JOHN MORGAN DECLINED TO TAKE RESPONSIBILITY FOR THE WASTE MATERIALS LOCATED IN TWO PITS ON SITE.
  - B. IN ORDER TO MITIGATE THE THREAT OF AN OIL RELEASE INTO AN UNNAMED TRIBUTARY OF THE MONONGAHELA RIVER, OSC OPENED FPN NO. 088-155 ON 11 MAY 1998.
  - C. ON 20 AND 21 MAY 1998, ERRS PUMPED OUT AND STORED APPROXIMATELY 12,000 GALLONS OF SUSPECTED CONTAMINATED OIL AND ANTI-FREEZE FROM THE TWO PITS ON SITE INTO A 21,000 GALLON FRAC TANK LOCATED UPGRADIENT FROM THE PITS. ERRS STABILIZED THE RESULTING SATURATED SOIL TO THE DEGREE POSSIBLE.
  - D. FOLLOWING REVIEW OF ANALYTICAL DATA INDICATING THE PRESENCE OF CERCLA HAZARDOUS MATERIALS AND DETERMINATION OF SITE CONDITIONS TO BE IN ACCORDANCE WITH FACTORS LISTED IN SECTION 300.415 OF THE NCP, A CERCLA REMOVAL ACTION WAS INITIATED BY THE OSC.
  - E. ON 20 AUGUST 1998, OSC INITIATED CERCLA FUNDING FOR THE PROJECT.
  - F. ERRS CONDUCTED T&D OF APPROXIMATELY 10,263 GALLONS OF HAZARDOUS WASTE OILS FROM FRAC TANK ON 14 SEPTEMBER 1998.
  - G. ERRS REMOVED APPROXIMATELY 160 GALLONS OF RESIDUAL CONTAMINATED WASTE OIL FROM FRAC TANK AND STAGED IN THREE (3) 55-GAL DRUMS FOR SUBSEQUENT T&D ON 16 SEPTEMBER 1998. RCRA EMPTY FRAC TANK WAS DEMOBILIZED FROM THE SITE ON 17 SEPTEMBER 1998 FOR DECONTAMINATION BY ERRS SUBCONTRACTOR.
  - H. ERRS ARRANGED FOR T&D OF THREE (3) 55 GAL DRUMS OF CONTAMINATED WASTE OIL/WATER TO ROSS INCINERATION SERVICES IN GRAFTON, OH FOR FINAL DISPOSAL 28 OCTOBER 1998. ALL LIQUID HAZARDOUS SUBSTANCES RELATED TO RELEASE HAVE BEEN TRANSPORTED OFF-SITE FOR DISPOSAL AS OF THAT DATE. ONE DRUM OF USED PPE AND CONTAMINATED HAZARDOUS WASTE PIT SOILS REMAIN ON-SITE PENDING T&D.
  - I. ACCORDING TO EPA RPM WHITTINGTON, WVDEP IS INTERESTED IN ASSESSING POTENTIAL LISTING OF SITE ON NPL. EPA PRE-REMEDIAL SECTION HAS BEEN INFORMED AND IS IN PROCESS OF

AR001231

ARRANGING FOR PA/SI SAMPLING AND HRS SCORING OF SITE BASED UPON CURRENT CONDITIONS.

- J. PERSONNEL ON SCENE: 11/09/98 - EPA-1, SATA-1, ERRS-4
- K. WEATHER: CLEAR HIGH IN MID 50s.
- L. ESTIMATED PROJECT COSTS: (AS OF C.O.B. 9 NOVEMBER 98)

	CURRENT COSTS	ACTION MEMO CEILING
AGENCY ERRS (AS OF 11/6/98)	\$37,588	\$150,000
SATA	2,589	15,000
EPA DIRECT	1,530	3,000
EPA INDIRECT	3,264	5,000
UNALLOCATED/CONTINGENCY		27,000
TOTAL	\$44,971	\$200,000

NOTE: ERRS ARE AT 25% OF CURRENT CEILING AND SATA IS AT 17% OF CURRENT CEILING.

## II. ACTIONS TAKEN

MONDAY, 9 NOVEMBER 1998

- A. AT 0730 HOURS SATA, ERRS AND THE OSC MOBILIZED TO THE SITE TO STABILIZE CONTAMINATED WASTE PIT SOILS FOR SUBSEQUENT T&D.
- B. AT APPROXIMATELY 0830 OSC, SATA AND ERRS HELD A DAILY SAFETY MEETING AND DISCUSSED HAZARDS ASSOCIATED WITH THE DAYS OPERATIONS. LEVEL C PPE WAS USED WITH SARAN SUITS FOR DEALING WITH LIQUID HAZARDS. INHALATION HAZARDS INCLUDED CAUSTICS ASSOCIATED WITH THE HIGH pH OF THE KILN DUST.
- C. SATA MOBED A PID, FID, AND JEROME METER TO PERFORM HEALTH AND SAFETY MONITORING DURING THE STABILIZATION OPERATIONS.
- D. ERRS MOBED AN EXCAVATOR TO MIX CONTAMINATED SOIL WITH KILN CEMENT DUST TO REDUCE FREE LIQUIDS FOR SUBSEQUENT T&D.
- E. AT 0945 HOURS ERRS MOBED A HOPPER TRUCK LOADED WITH KILN DUST. SATA TOOK READINGS WITH FID, PID, AND JEROME METER. A READING OF 11 PPM FOR ORGANICS WAS OBSERVED ON THE PID. NO READINGS WERE OBSERVED THROUGHOUT THE DAY ON THE FID OR JEROME METER. LEVEL C PPE WAS UTILIZED THROUGHOUT THE STABILIZATION ACTIVITIES.
- F. ERRS AND SATA USED POLY TO CONTROL DUST EMISSIONS FROM THE HOPPER TRUCK. ERRS MIXED THE CONTAMINATED WASTE PIT SOILS WITH THE KILN DUST AND LEFT THE MIXTURE TO CURE AND SOLIDIFY.

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- G. ERRS COLLECTED A SAMPLE OF THE STABILIZED CONTAMINATED SOIL FOR RCRA CHARACTERIZATION TO DETERMINE APPROPRIATE DISPOSAL OPTIONS.
- H. SATA CONDUCTED PHOTO AND WRITTEN DOCUMENTATION OF SITE ACTIVITIES.
- I. ERRS AND SATA SECURED THE SITE. ALL PARTIES DEMOBED AT 1330 HOURS.

III. FUTURE PLANS

- A. ERRS TO ARRANGE FOR RCRA ANALYSIS OF STABILIZED CONTAMINATED WASTE PIT SOILS AND ARRANGE FOR APPROPRIATE TRANSPORTATION AND DISPOSAL.
- B. ERRS TO RETURN TO SITE TO DISPOSE OF STABILIZED CONTAMINATED WASTE PIT SOILS AND DRUMS CONTAINING USED PPE. T&D TENTATIVELY SCHEDULED FOR EARLY DECEMBER 1998.
- C. OSC TO CONTINUE COORDINATION OF SITE ACTIVITIES WITH USCG 2ND DISTRICT, STATE AND LOCAL OFFICIALS, AND OSC MATLOCK.

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JEFF DODD, OSC  
U.S. EPA - REGION III  
WHEELING, WV

AR001233

POLREP #8

BIG JOHNS SALVAGE YARD - HOULT ROAD

FAIRMONT, MARION COUNTY, WV 26554

ATTN: RRC, CHARLIE KLEEMAN, KAREN MELVIN

EVENT: TRANSPORTATION AND DISPOSAL OF WASTE PIT OILS

- I. SITUATION (THURSDAY, 29 OCTOBER 1998, 1000 HOURS)
  - A. CURRENT PROPERTY OWNER JOHN MORGAN DECLINED TO TAKE RESPONSIBILITY FOR THE WASTE MATERIALS LOCATED IN TWO PITS ON SITE.
  - B. IN ORDER TO MITIGATE THE THREAT OF AN OIL RELEASE INTO AN UNNAMED TRIBUTARY OF THE MONONGAHELA RIVER, OSC OPENED FPN NO. 088-155 ON 11 MAY 1998.
  - C. ON 20 AND 21 MAY 1998, ERRS PUMPED OUT AND STORED APPROXIMATELY 12,000 GALLONS OF SUSPECTED CONTAMINATED OIL AND ANTI-FREEZE FROM THE TWO PITS ON SITE INTO A 21,000 GALLON FRAC TANK LOCATED UPGRADIENT FROM THE PITS. ERRS STABILIZED THE RESULTING SATURATED SOIL TO THE DEGREE POSSIBLE.
  - D. FOLLOWING REVIEW OF ANALYTICAL DATA INDICATING THE PRESENCE OF CERCLA HAZARDOUS MATERIALS AND DETERMINATION OF SITE CONDITIONS TO BE IN ACCORDANCE WITH FACTORS LISTED IN SECTION 300.415 OF THE NCP, A CERCLA REMOVAL ACTION WAS INITIATED BY THE OSC.
  - E. ON 20 AUGUST 1998, OSC INITIATED CERCLA FUNDING FOR THE PROJECT.
  - F. ERRS CONDUCTED T&D OF APPROXIMATELY 10,263 GALLONS OF HAZARDOUS WASTE OILS FROM FRAC TANK ON 14 SEPTEMBER 1998.
  - G. ERRS REMOVED APPROXIMATELY 160 GALLONS OF RESIDUAL CONTAMINATED WASTE OIL FROM FRAC TANK AND STAGED IN THREE (3) 55-GAL DRUMS FOR SUBSEQUENT T&D ON 16 SEPTEMBER 1998. RCRA EMPTY FRAC TANK WAS DEMOBILIZED FROM THE SITE ON 17 SEPTEMBER 1998 FOR DECONTAMINATION BY ERRS SUBCONTRACTOR.
  - H. ACCORDING TO EPA RPM WHITTINGTON, WVDEP IS INTERESTED IN ASSESSING POTENTIAL LISTING OF SITE ON NPL. EPA PRE-REMEDIAL SECTION HAS BEEN INFORMED AND IS IN PROCESS OF ARRANGING FOR PA/SI SAMPLING AND HRS SCORING OF SITE BASED UPON CURRENT CONDITIONS.
  - I. PERSONNEL ON SITE: 10/29/98: OSC-1, ERRS-2, FCE TRUCKING-1.
  - J. WEATHER: 10/29/98: FOGGY, TEMP IN 50'S.

AR001234

K. ESTIMATE OF COSTS TO DATE:

L.	CURRENT	CEILING
ERRS (AS OF 10/02/98)	\$ 33,118	\$150,000
SATA	\$ 3,896	15,000
EPA (DIRECT)	\$ 1,530	3,000
EPA (INDIRECT)	\$ 3,264	5,000
UNALLOCATED/CONTINGENCY		\$ 27,000
TOTAL	\$ 41,808	\$200,000

NOTE: ERRS COSTS ARE AT 24% OF CEILING. SATA COSTS ARE AT 26% OF CEILING. EPA (DIRECT) CEILING RAISED \$1,000 AND EPA(INDIRECT) RAISED \$2,000 THIS DATE.

II. ACTIONS TAKEN

THURSDAY, 28 OCTOBER 1998

- A. AT APPROXIMATELY 0830 HOURS, OSC AND ERRS MET ON SITE TO CONDUCT T&D OF THREE (3) 55-GALLON DRUMS OF CONTAMINATED WASTE OIL/WATER.
- B. FREEHOLD CARTAGE LOADED AND TRANSPORTED THREE (3) 55 GAL DRUMS OF CONTAMINATED WASTE OIL/WATER TO ROSS INCINERATION SERVICES IN GRAFTON, OH FOR FINAL DISPOSAL. ALL LIQUID HAZARDOUS SUBSTANCES RELATED TO RELEASE HAVE BEEN TRANSPORTED OFF-SITE FOR DISPOSAL AS OF THIS DATE. ONE DRUM OF USED PPE AND CONTAMINATED HAZARDOUS WASTE PIT SOILS REMAIN ON-SITE PENDING T&D.
- C. OSC AND ERRS RM DISCUSSED STRATEGY AND SCHEDULE FOR STABILIZATION, CHARACTERIZATION AND T&D OF HAZARDOUS CONTAMINATED WASTE PIT SOILS.
- D. ALL PARTIES DEPARTED SITE AT 1000 HRS.

III. FUTURE PLANS

- A. OSC TO PROVIDE DATA FROM MAY 1998 REMOVAL SAMPLING ASSESSMENT TO PRE-REMEDIAL SECTION FOR EVALUATION.
- B. ERRS TO REMOBILIZE TO THE SITE ON OR ABOUT 09 NOVEMBER 1998 TO STABILIZE HAZARDOUS CONTAMINATED WASTE PIT SOILS WITH CEMENT KILN DUST OR OTHER BINDING AGENT AND RESAMPLE MATERIAL FOR SUBSEQUENT T&D.
- C. T&D OF STABILIZED HAZARDOUS CONTAMINATED WASTE PIT SOILS TENTATIVELY SCHEDULED FOR WEEK OF 07 DECEMBER 1998.
- D. OSC TO CONTINUE COORDINATION OF SITE ACTIVITIES WITH USCG 2ND DISTRICT, STATE AND LOCAL OFFICIALS, AND OSC MATLOCK.

JEFF DODD, OSC  
US EPA REGION III  
WHEELING, WV

AR001235

POLREP #7

BIG JOHNS SALVAGE YARD - HOULT ROAD

FAIRMONT, MARION COUNTY, WV 26554

ATTN: RRC, CHARLIE KLEEMAN, KAREN MELVIN

EVENT: TRANSPORTATION AND DISPOSAL OF WASTE PIT OILS

- I. SITUATION (WEDNESDAY, 16 SEPTEMBER 1998, 1600 HOURS)
- A. CURRENT PROPERTY OWNER JOHN MORGAN DECLINED TO TAKE RESPONSIBILITY FOR THE WASTE MATERIALS LOCATED IN TWO PITS ON SITE.
  - B. IN ORDER TO MITIGATE THE THREAT OF AN OIL RELEASE INTO AN UNNAMED TRIBUTARY OF THE MONONGAHELA RIVER, OSC OPENED FPN NO. 088-155 ON 11 MAY 1998.
  - C. ON 20 AND 21 MAY 1998, ERRS PUMPED OUT AND STORED APPROXIMATELY 12,000 GALLONS OF CONTAMINATED OIL AND ANTI-FREEZE FROM THE TWO PITS ON SITE IN A 21,000 GALLON FRAC TANK LOCATED UPGRADIENT FROM THE PITS. ERRS STABILIZED THE RESULTING SATURATED SOIL TO THE DEGREE POSSIBLE.
  - D. FOLLOWING REVIEW OF ANALYTICAL DATA INDICATING THE PRESENCE OF CERCLA HAZARDOUS MATERIALS AND DETERMINATION OF SITE CONDITIONS TO BE IN ACCORDANCE WITH FACTORS LISTED IN SECTION 300.415 OF THE NCP, A CERCLA REMOVAL ACTION WAS INITIATED BY THE OSC.
  - E. ON 20 AUGUST 1998, OSC INITIATED CERCLA FUNDING FOR THE PROJECT.
  - F. ERRS AND SATA COMPILED A HEALTH AND SAFETY PLAN RECOMMENDING LEVEL C PPE DURING PUMPING OPERATIONS WITH A POSSIBLE UPGRADE TO LEVEL B PPE, DEPENDENT ON AIR MONITORING READINGS IN THE BREATHING ZONES.
  - G. PERSONNEL ON SITE: 09/14/98: OSC-1, ERRS-4, SATA-2, MEDIA-2, ROSS TRUCKING-2.  
09/16/98: OSC-1, ERRS-3, SATA-1, MPE-1.
  - H. WEATHER: 09/14/98: SUNNY, TEMP IN HIGH 80'S.  
09/16/98: SUNNY, TEMP IN HIGH 80'S.
  - I. ESTIMATE OF COSTS TO DATE: 09/16/98

	CURRENT	CEILING
ERRS	\$ 55,858	\$150,000
SATA	2,267	15,000
EPA (DIRECT)	570	2,000
EPA (INDIRECT)	1,216	3,000
UNALLOCATED/CONTINGENCY		\$ 30,000
TOTAL	\$ 59,911	\$200,000

NOTE: ERRS COSTS ARE AT 37% OF CEILING. SATA COSTS ARE AT 15% OF CEILING.

II ACTIONS TAKEN

MONDAY, 14 MAY 1998

- A. AT APPROXIMATELY 0700 HOURS, SATA AND ERRS MET ON SITE TO SET UP EQUIPMENT. FOLLOWING ARRIVAL OF THE OSC, A

AR001236



TAILGATE SAFETY MEETING WAS CONDUCTED PRIOR TO PUMPING ACTIVITIES.

- B. INITIAL AIR MONITORING READINGS IN THE TANK REVEALED 0% LEL METHANE, 50-60 PPM VOLATILE ORGANICS, AND 0.84 MG/M3 MERCURY. LEVEL C PPE WAS UTILIZED AS PER HEALTH AND SAFETY PLAN AS NO ENTRY INTO THE TANK WAS CONDUCTED.
  - C. TWO MEMBERS OF THE WEST VIRGINIA TIMES FROM FAIRMONT, WV JENNI VINCENT AND DANNY SNYDER, ARRIVED ON SITE AT 0930 HOURS. OSC UPDATED THE TWO MEMBERS ON SITE ACTIVITIES AND ESCORTED THEM ON A SITE WALK. THE PRESS MEMBERS DEPARTED THE SITE AT 1015 HOURS.
  - D. AT 1100 HOURS, ROSS TRUCKS ARRIVED ON SITE. ERRS CONDUCTED VAC OPERATIONS, FILLING ONE TANKER TRUCK WITH AN ESTIMATED 5,292 GALLONS AND A SECOND TANKER WITH AN ESTIMATED 4,971 GALLONS, TOTALING APPROXIMATELY 10,263 GALLONS OF CONTAMINATED WASTE OIL FOR DISPOSAL.
  - E. AIR MONITORING READINGS IN THE BREATHING ZONES WERE 0% LEL METHANE, 5-10 PPM VOLATILE ORGANICS, AND 0.025 MG/M3 OF MERCURY; UPGRADE TO LEVEL B PPE WAS NOT REQUIRED.
  - F. SATA CONDUCTED PHOTO AND WRITTEN DOCUMENTATION OF ALL SITE ACTIVITIES.
  - G. ALL REMAINING PARTIES DEPARTED SITE AT 1600 HOURS.
- WEDNESDAY, 16 SEPTEMBER 1998
- H. ERRS MET WITH SATA ON SITE AT 0630 HOURS TO SET UP EQUIPMENT AND PREPARE FOR THE GENERATORS AND PRESSURE WASHER TO ARRIVE FROM A POWER EQUIPMENT SUPPLIER.
  - I. INITIAL AIR MONITORING READINGS REVEALED 0% LEL METHANE, 3 PPM VOLATILE ORGANICS, AND 0.886 MG/M3 OF MERCURY IN THE PORTHOLES OF THE TANK. THE BREATHING ZONES WERE MONITORED AT 0% LEL METHANE, 0-3 PPM VOLATILE ORGANICS AND 0.003-0.008 MG/M3 OF MERCURY. ERRS PREPARED TO EMPTY THE REMAINDER OF THE TANK WASTE OILS IN LEVEL C PPE USING GRAVITY FEED, PRESSURE WASHER WITH EXTENDED WAND AND HAND SQUEEGEE.
  - J. AT 0815, THE GENERATORS AND PRESSURE WASHER ARRIVED ON SITE. ERRS CONDUCTED WASHING ACTIVITIES, FILLING 3 DRUMS WITH CONTAMINATED WASTE OILS/SLUDGE.
  - K. AIR MONITORING READINGS IN THE BREATHING ZONES MAINTAINED AT AN AVERAGE OF 0% LEL METHANE, 1 PPM VOLATILE ORGANICS, AND 0.004 MG/M3 OF MERCURY; UPGRADE TO LEVEL B PPE WAS NOT REQUIRED.
  - L. AT 1000 HOURS, ERRS COMPLETED PUMPING OPERATIONS. THE REMAINDER OF THE SLUDGE THAT COULD NOT BE PUMPED WAS COLLECTED IN A BUCKET AND DISPOSED OF IN THE DRUMS. APPROXIMATELY 135 GALLONS OF WASTE OILS/SLUDGE WERE PUMPED OUT OF THE TANK.
  - M. AT 1045 HOURS, ERRS DECONTAMINATED SITE EQUIPMENT AND DISPOSED OF ALL PPE IN ONE DRUM. ALL DISPOSABLE

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EQUIPMENT WAS STAGED IN THE WASTE PIT. CONSTRUCTION FENCING AND CAUTION TAPE WERE PLACED AROUND THE PERIMETER OF THE STABILIZED WASTE PITS.

- N. A TOTAL OF APPROXIMATELY 160 GALLONS OF COMBINED WASTE OILS AND DECON WATER ARE STAGED IN THREE DRUMS ON SITE FOR FUTURE DISPOSAL.
- O. SATA CONDUCTED PHOTO AND WRITTEN DOCUMENTATION OF ALL SITE ACTIVITIES.
- P. ALL PARTIES DEMOBED AT 1145 HOURS.

III. FUTURE PLANS

- A. ERRS TO RETURN TO SITE TO TRANSPORT FOUR DRUMS, THREE WASTE OILS AND ONE PPE, FOR DISPOSAL AND DEMOBE RCRA EMPTY FRAC TANK FOR SUBSEQUENT DEMOBE AND DECON.
- B. OSC TO CONTINUE COORDINATION OF SITE ACTIVITIES WITH USCG 2ND DISTRICT, STATE AND LOCAL OFFICIALS, AND OSC MATLOCK.

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JEFF DODD, OSC  
US EPA REGION III  
WHEELING, WV

AR001238

**POLREP # 6 - SPECIAL BULLETIN A**  
**BIG JOHN'S SALVAGE - HOULT ROAD**  
**FAIRMONT, MARION COUNTY, WV**

**ATTN:** REGIONAL RESPONSE CENTER, U.S. EPA REGION III

**DATE:** 10 AUGUST 1998

**FROM:** JEFFREY A. DODD, OSC EPA REGION III  
REMOVAL RESPONSE SECTION (3HS31)

**THRU:** KATHY HODGKISS, ACTING DEPUTY DIRECTOR  
HAZARDOUS SITE CLEANUP DIVISION

**THRU:** DENNIS P. CARNEY, CHIEF  
REMOVAL BRANCH (3HS30)

**THRU:** CHARLES KLEEMAN, CHIEF  
REMOVAL RESPONSE SECTION (3HS31)

**SUBJECT:** NOTIFICATION OF \$200,000 ACTIVATION AT THE BIG JOHNS SALVAGE  
SITE, FAIRMONT, MARION COUNTY, WV

- I. SITUATION (MONDAY, 10 AUGUST 1998)**
- A. ON 07 APRIL 1998, WVDEP RCRA INSPECTOR JOHN HANDO REQUESTED THAT EPA INVESTIGATE TWO EXCAVATED PITS CONTAINING USED OIL AT THE BIG JOHN'S PROPERTY. (THE BIG JOHN'S SALVAGE YARD WAS THE SITE OF A REMOVAL BRANCH DRUM CLEAN UP IN THE FALL OF 1992 DIRECTED BY OSC STEUTEVILLE AND A PRP REMOVAL ACTION IN THE EARLY 1980'S TO ADDRESS A RELEASE OF COAL TAR).**
  - B. A DEED SEARCH REVEALED THAT THE PROPERTY WAS PURCHASED BY STEEL FABRICATORS INC. IN NOVEMBER, 1997.**
  - C. CURRENT OWNER DECLINED TO TAKE RESPONSIBILITY FOR WASTE MATERIALS IN THE TWO WASTE PITS. OSC OPENED FPN NO. 088-155 ON 11 MAY 1998 FOR \$10,000 TO RESPOND TO IMMINENT AND SUBSTANTIAL THREAT OF RELEASE OF REPORTED WASTE OILS INTO UNNAMED TRIBUTARY TO THE MONONGAHELA RIVER.**
  - D. OSC DODD CONTACTED USCG 2<sup>ND</sup> DISTRICT ON 15 MAY 1998 AND OBTAINED AN ADDITIONAL \$20,000 UNDER FPN NO. 088-155 FOR REMOVAL CONTRACTOR SUPPORT TO MITIGATE THREAT OF RELEASE OF OIL FROM WASTE PITS INTO UNNAMED TRIB TO MONONGAHELA RIVER.**
  - E. ON 20 AND 21 MAY 1998, ERRS PUMPED OUT AND TEMPORARILY STAGED APPROXIMATELY 12,000 GALLONS OF SUSPECTED**

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CONTAMINATED OIL AND ANTI-FREEZE FROM THE TWO PITS ON SITE AND STABILIZED THE CONTAMINATED SOIL TO THE DEGREE POSSIBLE. SAMPLES OF WASTE OIL/WATER AND SOILS WERE COLLECTED FOR DISPOSAL AND HAZARDOUS SUBSTANCE CHARACTERIZATION.

- F. OSC DODD CONTACTED USCG 2<sup>ND</sup> DISTRICT ON 23 JULY 1998 AND OBTAINED AN ADDITIONAL \$15,000 UNDER FPN NO. 088-155 FOR TRANSPORTATION AND DISPOSAL OF WASTE OIL/WATER AND CONTAMINATED SOIL.
- G. REVIEW OF ANALYTICAL DATA INDICATES THE PRESENCE OF SEVERAL CERCLA HAZARDOUS SUBSTANCES IN BOTH WASTE OIL AND CONTAMINATED SOIL. MAXIMUM CONCENTRATIONS OF MERCURY (400 PPM), METHYLENE CHLORIDE (1100 PPM), 1,1,1-TRICHLOROETHANE (110 PPM), CARBON TETRACHLORIDE (15 PPM), NAPHTHALENE (270 PPM), AND NUMEROUS PAHs IN THE HUNDREDS OF PPM RANGE WERE FOUND IN THE WASTE OIL. RCRA TCLP DISPOSAL ANALYSIS INDICATED THE WASTE OIL TO BE A RCRA HAZARDOUS WASTE FOR CADMIUM (D006), LEAD (D008), MERCURY (D009), AND PYRIDINE (D038). RCRA TCLP DISPOSAL ANALYSIS OF CONTAMINATED SOIL INDICATED THE CONTAMINATED SOIL TO BE A RCRA WASTE FOR BENZENE (D018), CARBON TETRACHLORIDE (D019), CHLOROFORM (D022), 1,2-DICHLOROETHANE (D028), AND TRICHLOROETHENE (D040).

## II ACTIONS TAKEN

- A. DUE TO PRESENCE OF CERCLA HAZARDOUS SUBSTANCES PRESENT IN WASTE OIL AND CONTAMINATED SOIL, OSC DETERMINED THAT CERCLA FUNDING IS MORE APPROPRIATE TO FUND REMAINING REMOVAL ACTION ACTIVITIES AT SITE.
- B. MERCURY (D009), LEAD (D008), CADMIUM (D006), PYRIDINE (D038), BENZENE (D018), METHYLENE CHLORIDE, 1,1,1-TRICHLOROETHANE, CARBON TETRACHLORIDE (D019), CHLOROFORM (D022), 1,2-DICHLOROETHANE (D028), TRICHLOROETHENE (D040), AND NAPHTHALENE ARE LISTED AS HAZARDOUS SUBSTANCES IN THE NCP AT 40CFR304.2.
- C. INITIAL AND CURRENT SITE CONDITIONS MEET FACTORS LISTED IN SECTION 300.415 OF THE NCP TO BE CONSIDERED IN DETERMINING APPROPRIATENESS OF A REMOVAL ACTION AS FOLLOWS:
  - 1. 300.415 (b) (2)(I) "ACTUAL OR POTENTIAL EXPOSURE TO NEARBY HUMAN POPULATIONS, ANIMALS, OR THE FOOD CHAIN FROM HAZARDOUS SUBSTANCES OR POLLUTANTS OR CONTAMINANTS"

APPROXIMATELY 12,000 GALLONS OF WASTE OIL CONTAINING LEAD, CADMIUM, MERCURY AND PYRIDINE WERE LOCATED

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IN 2 UNLINED/UNCOMPACTED WASTE PITS IMMEDIATELY ADJACENT AND UPGRADIENT OF AN UNNAMED TRIBUTARY TO THE MONONGAHELA RIVER. ACCESS TO THE SITE WAS UNCONTROLLED ALLOWING THE POTENTIAL FOR DIRECT CONTACT WITH THESE HAZARDOUS SUBSTANCES. SOILS IN CONTACT WITH THE CONTAMINATED WASTE OIL USED FOR THE WASTE PITS WERE CONSOLIDATED ON-SITE AND ALSO SAMPLED FOR SUBSEQUENT DISPOSAL. ANALYTICAL DATA INDICATES THE CONTAMINATED SOILS ARE RCRA HAZARDOUS WASTE CONTAINING BENZENE, CARBON TETRACHLORIDE, CHLOROFORM, 1,2-DICHLOROETHANE AND TRICHLOROETHANE. THE PRESENCE OF THESE HAZARDOUS SUBSTANCES IN THE SOILS PRESENTS A DIRECT CONTACT THREAT.

2. 300.415 (b)(2)(ii) "ACTUAL OR POTENTIAL CONTAMINATION OF DRINKING WATER SUPPLIES OR SENSITIVE ECOSYSTEMS"

INITIAL SITE CONDITIONS PRESENTED AN IMMINENT POTENTIAL FOR THE RELEASE OF THE WASTE OIL CONTAINING HAZARDOUS SUBSTANCES TO THE MONONGAHELA RIVER, A DRINKING WATER SOURCE. THE WASTE PITS WERE UNLINED/UNCOMPACTED WITH LESS THAN 2 FEET OF FREEBOARD. THE SITUATION WAS STABILIZED UNDER OPA FUNDING BY PUMPING THE CONTAMINATED WASTE OIL INTO A TEMPORARY HOLDING TANK ON-SITE AND SAMPLED FOR SUBSEQUENT DISPOSAL. CONTINUED REMOVAL ACTION IS NECESSARY TO COMPLETE MITIGATION OF THREATS POSED BY HAZARDOUS SUBSTANCES IN THE WASTE OIL AND SOILS.

3. 300.415 (b)(2)(iv) "HIGH LEVELS OF HAZARDOUS SUBSTANCES, POLLUTANTS OR CONTAMINANTS IN SOILS LARGELY AT OR NEAR THE SURFACE, THAT MAY MIGRATE"

SOILS IN CONTACT WITH THE CONTAMINATED WASTE OIL USED FOR THE WASTE PITS WERE CONSOLIDATED ON-SITE PENDING ANALYTICAL CHARACTERIZATION. ANALYTICAL DATA INDICATES THE CONTAMINATED SOILS ARE RCRA HAZARDOUS WASTE CONTAINING BENZENE, CARBON TETRACHLORIDE, CHLOROFORM, 1,2-DICHLOROETHANE AND TRICHLOROETHANE. THE POTENTIAL FOR THE MIGRATION OF THESE HAZARDOUS SUBSTANCES OFFSITE TO THE MONONGAHELA RIVER VIA AN UNNAMED TRIBUTARY IS LIKELY BASED UPON CURRENT SITE CONDITIONS.

4. 300.415 (b) (2) (vii) "THE AVAILABILITY OF OTHER APPROPRIATE FEDERAL OR STATE

**MECHANISMS TO RESPOND TO THE  
RELEASE"**

WVDEP REQUESTED EPA ASSISTANCE TO ADDRESS THE THREATS POSED BY THE CONTAMINATED WASTE OIL AT THE SITE. THE PRESENCE OF HAZARDOUS SUBSTANCES AS SPECIFIED IN 40CFR302.4 IN THE WASTE OIL AND CONTAMINATED SOIL INDICATES THAT CERCLA FUNDING IS MORE APPROPRIATE THAN CONTINUATION OF AN OPA FUNDED REMOVAL ACTION. CERCLA FUNDING IS NEEDED TO COMPLETE REMOVAL ACTION ACTIVITIES WHICH WERE BEGUN UNDER OPA FUNDING.

- D. THE REMAINING ACTIONS TO BE CONDUCTED AT THE SITE INCLUDE ON-SITE STABILIZATION OF SOILS, OFF-SITE TRANSPORTATION, TREATMENT (IF NECESSARY), AND DISPOSAL OF APPROXIMATELY 12,000 GALLONS OF WASTE OIL AND CONTAMINATED SOIL CONTAINING HAZARDOUS SUBSTANCES. IN ADDITION, IT WILL BE NECESSARY TO STABILIZE THE FORMER WASTE PIT AREA OF THE SITE AND DECONTAMINATE THE STORAGE TANK AND OTHER RESPONSE EQUIPMENT UPON COMPLETION OF TRANSPORTATION AND DISPOSAL ACTIVITIES.
- E. THE CONDITIONS AT THE BIG JOHNS SALVAGE SITE MEET THE CONDITIONS SET FORTH IN SECTION 400.415 OF THE NCP FOR A REMOVAL ACTION. THE OSC HAS INITIATED CERCLA FUNDING FOR THIS REMOVAL ACTION.
- F. THE ESTIMATED COSTS ARE AS FOLLOWS:
- |                         |           |
|-------------------------|-----------|
| ERRS                    | \$150,000 |
| SATA                    | \$ 15,000 |
| EPA                     | \$ 5,000  |
| UNALLOCATED/CONTINGENCY | \$ 30,000 |

\$200,000

**III FUTURE PLANS**

- A. OSC TO COORDINATE ISSUANCE OF ERRS DELIVERY ORDER.
- B. ERRS CONTRACTOR TO ARRANGE T&D OF CONTAMINATED WASTE OIL AND SOILS.
- C. ERRS TO DEVELOP TECHNICAL APPROACH AND HASP TO ADDRESS DECONTAMINATION OF TEMPORARY STORAGE TANK.
- C. OSC TO OBTAIN HQ GUIDANCE ON USE OF STABILIZATION MATERIALS.
- D. OSC TO CONTINUE COORDINATION OF SITE ACTIVITIES WITH USCG, STATE AND LOCAL OFFICIALS.

JEFFREY DODD, OSC  
US EPA REGION III  
WHEELING, WV

AR001242

POLREP #5

BIG JOHNS SALVAGE - HOULT ROAD

FPN #088-155

HOULT ROAD

FAIRMONT, MARION COUNTY, WV

ATTN: RRC, CHARLIE KLEEMAN, KAREN MELVIN

EVENT: SWITCHING OF RESPONSE ACTION FUNDING FROM OPA TO CERCLA

I. SITUATION (FRIDAY, 08 JUNE 1998, 1200 HOURS)

- A. ON 07 APRIL 1998, WVDEP RCRA INSPECTOR JOHN HANDO REQUESTED THAT EPA INVESTIGATE TWO EXCAVATED PITS CONTAINING USED OIL AT THE BIG JOHN'S PROPERTY. (THE BIG JOHN'S SALVAGE YARD WAS THE SITE OF A REMOVAL BRANCH DRUM CLEAN UP IN THE FALL OF 1992 DIRECTED BY OSC STEUTEVILLE AND A PRP REMOVAL ACTION IN THE EARLY 1980'S TO ADDRESS A RELEASE OF COAL TAR).
- B. A DEED SEARCH REVEALED THAT THE PROPERTY WAS PURCHASED BY STEEL FABRICATORS INC. IN NOVEMBER, 1997.
- C. CURRENT OWNER DECLINED TO TAKE RESPONSIBILITY FOR WASTE MATERIALS IN THE TWO WASTE PITS. OSC OPENED FPN NO. 088-155 ON 11 MAY 1998 FOR \$10,000 TO RESPOND TO IMMINENT AND SUBSTANTIAL THREAT OF RELEASE OF REPORTED WASTE OILS INTO UNNAMED TRIBUTARY TO THE MONONGAHELA RIVER.
- D. OSC DODD CONTACTED USCG 2<sup>ND</sup> DISTRICT ON 15 MAY 1998 AND OBTAINED AN ADDITIONAL \$20,000 UNDER FPN NO. 088-155 FOR REMOVAL CONTRACTOR SUPPORT TO MITIGATE THREAT OF RELEASE OF OIL FROM WASTE PITS INTO UNNAMED TRIB TO MONONGAHELA RIVER.
- E. ON 20 AND 21 MAY 1998, ERRS PUMPED OUT AND TEMPORARILY STAGED APPROXIMATELY 12,000 GALLONS OF SUSPECTED CONTAMINATED OIL AND ANTI-FREEZE FROM THE TWO PITS ON SITE AND STABILIZED THE CONTAMINATED SOIL TO THE DEGREE POSSIBLE. SAMPLES OF WASTE OIL/WATER AND SOILS WERE COLLECTED FOR DISPOSAL AND POSSIBLE HAZARDOUS SUBSTANCE CHARACTERIZATION.
- F. OSC DODD CONTACTED USCG 2<sup>ND</sup> DISTRICT ON 23 JULY 1998 AND OBTAINED AN ADDITIONAL \$15,000 UNDER FPN NO. 088-155 FOR TRANSPORTATION AND DISPOSAL OF WASTE OIL/WATER AND CONTAMINATED SOIL.
- G. REVIEW OF ANALYTICAL DATA INDICATES THE PRESENCE OF SEVERAL CERCLA HAZARDOUS SUBSTANCES IN BOTH WASTE OIL AND CONTAMINATED SOIL. MAXIMUM CONCENTRATIONS OF MERCURY (400 PPM), METHYLENE CHLORIDE (1100 PPM), 1,1,1-TRICHLOROETHANE (110 PPM), CARBON TETRACHLORIDE (15 PPM), NAPHTHALENE (270 PPM), AND NUMEROUS PAHs IN THE HUNDREDS

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OF PPM RANGE WERE FOUND IN THE WASTE OIL. RCRA TCLP DISPOSAL ANALYSIS INDICATED THE WASTE OIL TO BE A RCRA HAZARDOUS WASTE FOR CADMIUM (D006), LEAD (D008), MERCURY (D009), AND PYRIDINE (D038). RCRA TCLP DISPOSAL ANALYSIS OF CONTAMINATED SOIL INDICATED THE CONTAMINATED SOIL TO A RCRA WASTE FOR BENZENE (D018), CARBON TETRACHLORIDE (D019), CHLOROFORM (D022), 1,2-DICHLOROETHANE (D028), AND TRICHLOROETHENE (D040). ACTIVE COAL TAR SEEPS WERE OBSERVED BY THE OSC IN THE GENERAL AREA OF THE WASTE PITS ARE BELIEVED TO BE THE SOURCE OF THE RCRA HAZARDOUS COMPONENTS DETECTED IN THE CONTAMINATED SOIL RATHER THAN FROM THE WASTE OIL SINCE THESE HAZARDOUS SUBSTANCES WERE NOT DETECTED ABOVE RCRA REGULATORY LEVELS IN THE WASTE OIL.

## II ACTIONS TAKEN

WEDNESDAY, 05 AUGUST 1998

- A. OSC DODD DISCUSSED SWITCHING OF REMOVAL ACTION FUNDING FROM OPA TO CERCLA WITH SECTION CHIEF KLEEMAN AND ERRS TPO HESTON DUE TO PRESENCE OF CERCLA HAZARDOUS SUBSTANCES IN WASTE OIL AND CONTAMINATED SOILS ON-SITE.
- B. OSC INFORMED ERRS RM BAHURIAK TO CEASE SITE ACTIVTES AND T&D ARRANGEMENTS AT SITE UNTIL CERCLA FUNDING APPROVED AND NEW DELIVERY ORDER IS CUT.

THURSDAY, 06 AUGUST 1998

- C. OSC DODD CONTACTED USCG NPFC TANSEY AND SPENCE TO DISCUSS FINDINGS OF ANALYTICAL SAMPLES CONTAINING CERCLA HAZARDOUS SUBSTANCES AT ELEVATED LEVELS. OSC DODD AND NPFC SPENCE AGREE THAT FUNDING SHOULD BE CERCLA RATHER THAN OPA DUE TO PRESENCE OF HAZARDOUS SUBSTANCES IN WASTE OIL AND SOIL. NPFC SPENCE TO COORDINATE WITH FINANCE TO DETERMINE IF ANY OPA FUNDS HAD BEEN RELEASED FOR PAYMENT. OSC DODD AND NPFC SPENCE TO COORDINATE CANCELLATION OF FPN NO. 088-155.

## II FUTURE PLANS

- A. OSC DODD TO ISSUE SPECIAL BULLETIN A AUTHORIZING CERCLA REMOVAL ACTION UNDER \$200K DELEGATED AUTHORITY TO COMMENCE EMERGENCY REMOVAL ACTIONS AT SITE TO COMPLETE REMOVAL ACTION AT SITE.
- B. OSC TO CONTINUE COORDINATION OF SITE ACTIVITIES WITH USCG, STATE, LOCAL OFFICIALS AND OSC MATLOCK.

JEFF DODD, OSC  
US EPA REGION III  
WHEELING, WV

AR001244



POLREP #4

BIG JOHNS SALVAGE - HOULT ROAD

FPN #088-155

HOULT ROAD

FAIRMONT, MARION COUNTY, WV

ATTN: RRC, CHARLIE KLEEMAN, KAREN MELVIN

EVENT: INITIATION OF FUND-LEAD OPA REMOVAL/OPA ACTIVATION

I. SITUATION (THURSDAY, 23 JULY 1998, 1700 HOURS)

- A. AFTER CURRENT OWNER DECLINED TO TAKE RESPONSIBILITY FOR THE TWO WASTE PITS, THE OSC ACTIVATED ERRS TO INITIATE STABILIZATION ACTIONS ON 20 MAY 1998.
- B. ON 20 AND 21 MAY 1998, ERRS PERSONNEL PUMPED OUT AND STORED APPROXIMATELY 12,000 GALLONS OF CONTAMINATED WASTE OIL AND WATER FROM THE TWO ON-SITE PITS AND STABILIZED THE OIL SATURATED SOIL. DISPOSAL SAMPLES WERE COLLECTED AND ARRANGEMENTS FOR T&D OF THE WASTE OIL AND SOILS WAS INITIATED.
- C. ESTIMATED PROJECT COSTS:

<u>AGENCY</u>	<u>CURRENT COSTS</u>	<u>CEILING</u>
ERRS (AS OF 24JUN98)	\$11,360	\$35,000
SATA	4,359	8,500
EPA DIRECT	345	1,500
TOTAL	<u>\$16,064</u>	<u>\$45,000</u>

NOTE: ERRS IS AT 32.5% OF CURRENT CEILING. SATA IS AT 51.3% OF CURRENT CEILING.

II. ACTIONS TAKEN

- A. PREPARATIONS FOR T&D OF WASTE OIL AND SOIL CONTINUE.
- B. OSC DODD CONTACTED USCG 2<sup>ND</sup> DISTRICT AND OBTAINED AN ADDITIONAL \$15K UNDER FPN NO. 088-155 TO CONTINUE REMOVAL ACTIONS AND T&D OF THE WASTE OIL FROM THE WASTE PITS.
- C. OSC DODD UPDATED WVDEP MOSKAL ON CURRENT ACTIONS AND ANTICIPATED T&D SCHEDULE.

III. FUTURE PLANS

- A. ARRANGEMENTS FOR T&D OF CONTAMINATED WASTE OIL AND CONTAMINATED SOIL TO BE FINALIZED.
- B. OSC DODD WILL REVIEW THE ASSESSMENT ANALYTICAL UPON RECEIPT FOR POSSIBLE ADDITIONAL REMOVAL ACTIONS.
- C. OSC DODD TO CONTINUE COORDINATION OF SITE ACTIVITIES WITH USCG, STATE AND LOCAL OFFICIALS.

JEFF DODD, OSC  
US EPA REGION III  
WHEELING, WV

AR001245

POLREP #3

BIG JOHNS SALVAGE - HOULT ROAD

FPN #088-155

FAIRMONT, MARION COUNTY, WV

ATTN: RRC, CHARLIE KLEEMAN, KAREN MELVIN

EVENT: OPA ACTIVATION AND STABILIZATION OF OIL PITS

**I. SITUATION (THURSDAY, 21 MAY 1998, 1800 HOURS)**

- A. AFTER CURRENT OWNER DECLINED TO TAKE RESPONSIBILITY FOR THE TWO WASTE PITS, THE OSC ACTIVATED ERRS TO BE ON SITE AT 0900 HOURS, 20 MAY 1998.
- B. ON 20 AND 21 MAY 1998, ERRS PUMPED OUT AND STORED 12,000 GALLONS OF CONTAMINATED OIL AND ANTI-FREEZE FROM THE TWO PITS ON SITE AND STABILIZED THE OIL SATURATED SOIL TO THE DEGREE POSSIBLE.
- C. PERSONNEL ON SITE: OSC-2, ERRS-4, SATA-1.
- D. WEATHER: SUNNY, TEMP IN THE HIGH 80'S.

**II ACTIONS TAKEN**

WEDNESDAY, 20 MAY 1998

- A. AT 0900 OSCs DODD AND MATLOCK MET WITH ERRS RM BAHURIAK ON SITE TO DISCUSS THE WORK PLAN TO CONTAIN THE OIL FROM THE TWO WASTE PITS AND STABILIZE THE RESULTING SATURATED SOIL. THE SITE SAFETY PROCEDURES WERE REVIEWED AND ERRS BEGAN PUMPING THE CONTAMINATED OIL INTO A 21,000 GALLON FRAC TANK STAGED UPGRADIENT FROM THE PITS.
- B. THE OSC ALSO REQUESTED THAT ERRS CONSTRUCT AN UNDERFLOW DAM APPROXIMATELY 30 YARDS DOWN GRADIENT FROM THE PITS TO ASSIST IN ANY RUNOFF PROBLEMS AND TO ADDRESS WHAT APPEARS TO BE A CREOSOTE PROBLEM UPGRADIENT FROM THE TWO OIL PITS. THE UNDERFLOW DAM WAS COMPLETED AT 1500 HOURS.
- C. ERRS COMPLETED PUMPING AS MUCH OIL AS WAS POSSIBLE FROM PIT ONE AT 1500 HOURS AND BEGAN SCRAPING AND CONSOLIDATING THE CONTAMINATED SOIL WHILE PUMPING OUT PIT TWO.
- D. INITIAL VERBAL ANALYTICAL RESULTS INDICATED THAT THE OIL FROM PIT ONE IS A HIGHLY DEGRADED MOTOR OIL AND THAT THE SUBSTANCE FROM PIT TWO APPEARS TO BE A MIXTURE OF WATER AND DIRTY ANTIFREEZE. NO PCBS WERE FOUND IN EITHER SAMPLE.
- E. ERRS DEPARTED SITE AT 1830 HOURS.

THURSDAY, 21 MAY 1998

- F. ERRS CONTINUED PUMPING OIL FROM PIT TWO AT 0830 HOURS AND AFTER PUMPING AS MUCH OIL AS POSSIBLE, BEGAN STABILIZING THE CONTAMINATED SOIL FROM BOTH PITS AT 0930 HOURS.

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- G. RM BAHURIAK REQUESTED THAT THE OSC CONSIDER USING FLY ASH OR PORTLAND CEMENT TO ASSIST IN STABILIZING AND SOLIDIFYING THE SATURATED SOIL PRIOR TO DISPOSAL. SATA CONTACTED A LOCAL SUPPLIER OF FLY ASH AND THE OSC CONTACTED ERT FOR ASSISTANCE. ERT SUGGESTED THAT THE OSC NOT ADD FLY ASH OR PORTLAND CEMENT UNTIL FURTHER ANALYTICAL RESULTS WERE OBTAINED AND A DISPOSAL OPTION WAS IDENTIFIED.
  - H. AT 1000 HOURS, ERRS CONTINUED CONSOLIDATING SOIL FROM BOTH PITS USING SURROUNDING SOIL FROM THE PIT WALLS AND UPGRADIENT OF THE PITS. ERRS CAPPED THE COMBINED PITS WITH NATIVE SOIL AND COVERED THE REMAINING PIT AREA WITH POLY. APPROXIMATELY 12,000 GALLONS OF CONTAMINATED OIL AND ANTIFREEZE IS STORED IN THE FRAC TANK ON SITE.
  - I. AT 1315 HOURS, ERRS COMPLETED REPAIRS TO THE UNDERFLOW DAM AND ADDED ADDITIONAL PVC SECTIONS.
  - J. AT 1445 HOURS ERRS DECONTAMINATED SITE EQUIPMENT AND THE JD490E TRACK HOE. ERRS/SATA DEPARTED THE SITE AT 1515 HOURS.
- II FUTURE PLANS
- A. UPON RECEIPT OF THE DISPOSAL ANALYTICAL, THE OSC WILL COORDINATE DISPOSAL ACTIVITIES WITH ERRS.
  - B. OSC TO CONTINUE COORDINATION OF SITE ACTIVITIES WITH USCG, STATE, LOCAL OFFICIALS AND OSC MATLOCK.

JEFF DODD, OSC  
US EPA REGION III  
WHEELING, WV

AR001247

**POLREP #2**

**BIG JOHNS SALVAGE - HOULT ROAD**

**FPN #088-155**

**HOULT ROAD**

**FAIRMONT, MARION COUNTY, WV**

**ATTN: RRC, CHARLIE KLEEMAN, KAREN MELVIN**

**EVENT: INITIATION OF FUND-LEAD OPA REMOVAL/OPA ACTIVATION**

**I. SITUATION (FRIDAY, 15 MAY 1998, 1700 HOURS)**

- A. OSC MATLOCK ISSUED CWA 311C ORDER TO CURRENT OWNER, JOHN MORGAN ON OR ABOUT 13 MAY 1998 TO STABILIZE THE POTENTIAL RELEASE OF OIL FROM THE 2 WASTE PITS ON-SITE BY PUMPING OUT THE OIL IN THE WASTE PITS INTO TEMPORARY STORAGE TANKS ON-SITE AND PROPERLY CHARACTERIZING THE WASTE OIL MATERIALS FOR DISPOSAL.**
- B. COUNSEL FOR JOHN MORGAN, WILLIAM HAIN, SUBMITTED RESPONSE TO 311C ORDER ON 15 MAY 1998, DECLINING HIS CLIENTS RESPONSIBILITY TO CLEAN-UP THE WASTE OIL IN THE PITS CITING THAT THE DISCHARGE WAS CAUSED BY SUBCONTRACTORS HIRED BY HIS CLIENT TO SCRAP THE ON-SITE STORAGE TANK. HAIN ALSO REPRESENTED THAT WVDEP HAD INDICATED THAT THE TANK FROM WHICH THE WASTE OIL WAS RELEASED WAS EMPTY AND THEREFORE HIS CLIENT SHOULD NOT BE RESPONSIBLE FOR CLEANING UP THE WASTE OIL. HAIN ALSO REPRESENTED THAT HIS CLIENT DID NOT HAVE THE FINANCIAL RESOURCES TO CONDUCT THE REMOVAL ACTION AT THIS TIME..**

**II. ACTIONS TAKEN**

- A. AFTER CONSULTING WITH OSC MATLOCK AND ORC ISALES CONCERNING THE RP'S DECISION TO NOT CONDUCT THE ACTIONS SPECIFIED IN THE 311C ORDER, OSC DODD INITIATED A FUND-LEAD OPA REMOVAL ACTION**
- B. OSC DODD CONTACTED USCG 2<sup>ND</sup> DISTRICT AND OBTAINED AN ADDITIONAL \$20K UNDER FPN NO. 088-155 FOR A REMOVAL CONTRACTOR TO INITIATE CLEANUP OF THE WASTE OIL FROM THE WASTE PITS.**
- C. OSC DODD OPENED A DELIVERY ORDER UNDER THE REGION 3 ERRS CONTRACT TO INITIATE STABILIZATION ACTIONS AT THE SITE TO BEGIN ON OR ABOUT 20 MAY 1998.**
- D. ORC ISALES AND OSC DODD DRAFTED AN ACCESS CONSENT REQUEST TO CONDUCT THE REMOVAL ACTIONS FROM THE CURRENT OWNER, JOHN MORGAN. A COPY OF THE ACCESS CONSENT WAS FAXED TO BOTH MR MORGAN AND HIS ATTORNEY WILLIAM HAIN. MR. MORGAN FAXED A SIGNED COPY OF THE ACCESS AGREEMENT TO OSC DODD THIS DATE GRANTING EPA ACCESS TO THE SITE TO CONDUCT THE OPA REMOVAL ACTION.**

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- E. OSC DODD ATTEMPTED TO CONTACT WVDEP REPS HANDO AND HAYES TO NOTIFY THEM OF THE EPA FUND-LEAD REMOVAL ACTION. MESSAGES WERE LEFT AT BOTH OFFICES.

III. FUTURE PLANS

- A. OSC DODD TO INITIATE AND COORDINATE OPA REMOVAL ACTION AT THE SITE. WASTE OIL FROM PITS WILL PUMPED INTO TEMPORARY STORAGE TANK ON-SITE, SECONDARY CONTAINMENT PLACED AROUND TEMPORARY STORAGE TANK, WASTE PITS DECOMMISSIONED AND CONSOLIDATED PENDING ANALYTICAL RESULTS AND SAMPLING OF THE WASTE OIL FOR SUBSEQUENT DISPOSAL.
- B. OSC MATLOCK AND SATA TO OVERSEE ERRS ON-SITE ACTIVITIES.
- C. OSC DODD WILL REVIEW THE ASSESSMENT ANALYTICAL UPON RECEIPT FOR POSSIBLE ADDITIONAL REMOVAL ACTIONS.
- D. OSC DODD TO CONTINUE COORDINATION OF SITE ACTIVITIES WITH USCG, STATE AND LOCAL OFFICIALS.

JEFF DODD, OSC  
US EPA REGION III  
WHEELING, WV

AR001249

POLREP #1

BIG JOHNS SALVAGE - HOULT ROAD

FPN #088-155

HOULT ROAD

FAIRMONT, MARION COUNTY, WV

ATTN: RRC, CHARLIE KLEEMAN, KAREN MELVIN

EVENT: SAMPLE ASSESSMENT OF OIL PITS AND GLASS CULLET AREA  
OPA ACTIVATION

I. SITUATION (MONDAY, 08 MAY 1998, 1700 HOURS)

- A. DURING THE CONTAINMENT OF A COAL TAR SPILL AT THE ADJACENT SHARON STEEL PROPERTY ON 07 APRIL 1998, WVDEP RCRA INSPECTOR JOHN HANDO REQUESTED THAT EPA INVESTIGATE TWO EXCAVATED PITS CONTAINING USED OIL AND GLASS CULLET PILE AT THE BIG JOHN'S PROPERTY. BIG JOHN'S SALVAGE SITE - HOULT RD WAS THE SITE OF A REMOVAL BRANCH DRUM CLEAN UP IN THE FALL OF 1992 DIRECTED BY OSC STEUTEVILLE AND A PRP REMOVAL OF A COAL TAR SPILL IN 1983 UNDER OSC SASSEEN. HISTORICAL INFORMATION RELATED TO THE SITE INDICATES THAT COAL TAR IS PRESENT AT SHALLOW DEPTHS BELOW THE GROUND SURFACE. WVDEP INDICATED THAT THE CULLET PILE IS A HAZARDOUS WASTE FOR LEAD.
- B. A DEED SEARCH REVEALED THAT THE PROPERTY WAS PURCHASED BY STEEL FABRICATORS INC. IN NOVEMBER, 1997.
- C. OSC DODD MET WITH THE OWNER, JOHN MORGAN, OF HUNDRED, WEST VIRGINIA, WVDEP, WVDNR, CITY OF FAIRMONT BUILDING INSPECTORS, AND FAIRMONT CITY POLICE AT THE SITE ON 24 APRIL 1998. WVDEP AND CITY OF FAIRMONT OFFICIALS WERE CONCERNED WITH THE NEW OWNERS SITE ACTIVITIES POTENTIALLY CAUSING A RELEASE AND EXPOSURE TO POSSIBLE HAZARDOUS SUBSTANCES AT THE SITE. THE OWNER AGREED THAT NO FURTHER CLEARING OR DEBRIS MOVING OPERATIONS BE CONDUCTED UNTIL THE EPA HAD TIME TO ASSESS THE OIL PITS AND THE GLASS CULLET AREA ON SITE.
- D. OSC DODD AND ORC ISALES COORDINATED ACCESS TO THE SITE TO CONDUCT A SAMPLING ASSESSMENT. THE CURRENT OWNER, JOHN MORGAN, PROVIDED WRITTEN ACCESS TO THE SITE ON OR ABOUT 06 MAY 1998.
- E. OSC WELSH AND CI RICHARDSON MET WITH THE OWNER, JOHN MORGAN AT THE SITE ON 30 APRIL 1998. TOPICS DISCUSSED WERE THE OWNER'S POTENTIAL LIABILITY UNDER CERCLA AND TO GATHER BACKGROUND INFORMATION ON THE RELEASE OF OIL INTO THE WASTE PITS AND SITE ACTIVITIES. OSC WELSH NOTED SEVERAL AREAS ON THE SITE WHERE COAL TAR WAS SEEPING ONTO HE GROUND SURFACE. OSC WELSH RECOMMENDED THAT

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THE OWNER MAKE TEMPORARY REPAIRS TO OIL PITS TO PREVENT RELEASE OF THE OIL MATERIALS.

- F. PERSONNEL ON SITE: OSC-1, SATA-2.
- G. WEATHER: CLOUDY, TEMP IN THE LOW 60'S.

## II ACTIONS TAKEN

FRIDAY, 08 MAY 1998.

- A. AT 1530 HOURS, THE OSC AND SATA SURVEYED THE BIG JOHNS SITE TO DETERMINE IDEAL SAMPLE LOCATIONS AROUND THE TWO OIL PITS AND THE GLASS CULLET AREA. THE OSC REQUESTED THAT TWO OIL SAMPLES BE TAKEN(ONE FROM EACH PIT) AND FOUR SOIL SAMPLES BE COLLECTED PREDOMINATELY FROM AREAS DOWNGRADIENT OF THE TWO PITS. ONE ADDITIONAL WATER SAMPLE WAS COLLECTED FROM A RUNOFF AREA LATERAL BUT DOWNGRADIENT OF THE PITS. A COMPOSITE SAMPLE WAS COLLECTED FROM THE GLASS CULLET AREA ON SITE AND FOUR ADDITIONAL SOIL SAMPLES WERE COLLECTED FROM AREAS LATERAL TO AND DOWNGRADIENT FROM THE GLASS CULLET AREA. IN ADDITION, A WATER SAMPLE WAS COLLECTED FROM A RETENTION POND DOWNGRADIENT OF THE GLASS CULLET AREA.
- B. THE OSC ALSO REQUESTED THAT TWO ADDITIONAL AREAS BE SAMPLED FOR WASTE PROFILE ANALYSIS; ONE AREA CONTAINED A GRAYISH-WHITE SOLID OF UNKNOWN ORIGIN, AND A SECOND AREA CONTAINED WHAT APPEARS TO BE COAL TAR SEEPING ONTO GROUND SURFACE.
- C. THE OILY MATERIAL IN THE WASTE PITS WERE FOUND TO BE LOCATED ON THE BOTTOM OF THE WASTE PITS, I.E., THE WASTE IS HEAVIER THAN WATER. SEVERAL GROUND SURFACE SEEPS OF WHAT APPEARED TO BE COAL TAR WERE PRESENT NEAR THE WASTE PITS AND IN A AREA ADJACENT TO THE WASTE PITS WHERE APPARENT RECENT GROUND CLEARING ACTIVITIES HAD TAKEN PLACE. THE GLASS CULLET WAS OBSERVED TO BE SPREAD OUT OVER AN AREA APPROXIMATELY 1 ACRE IN SIZE. RECENT VEHICLE TRACK MARKS WERE APPARENT IN THE CULLET AREA AND ACCORDING TO WVDEP THE CULLET HAD BEEN PILED INTO ONE PILE HAS NOW BEEN SPREAD OVER ABOUT AN AREA 1 ACRE IN SIZE.
- D. THE OSC DEPARTED THE SITE AT 1915 HOURS. SATA DEPARTED AT 2000 HOURS.

MONDAY, 11 MAY 1998

- E. WVDEP HANDO PROVIDED A COPY OF ANALYTICAL DATA FROM SAMPLES COLLECTED FROM THE 2 WASTE PITS. THE DATA INDICATED THAT THE WASTE MATERIALS WERE A MIXTURE OF WASTE OIL AND DIESEL FUEL.
- F. BASED UPON VISUAL OBSERVATIONS OF THE CONDITION (LESS THAN 1-2 FEET FREEBOARD, UNCOMPACTED FILL MATERIAL) AND

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LOCATION OF THE 2 WASTE PITS (THE PITS ARE LOCATED IMMEDIATELY ABOVE AN UNNAMED TRIBUTARY WHICH LEADS TO THE MONONGAHELA RIVER), OSC DODD DETERMINED THAT IMMEDIATE REMOVAL ACTIONS TO MITIGATE THE THREATS POSED BY THE POTENTIAL RELEASE OF THE OIL WAS NECESSARY UNDER OPA 1990.

- G. THE OSC FURTHER DISCUSSED THE SITE WITH ENFORCEMENT OSC WELSH, CI RICHARDSON, ENFORCEMENT CHIEF MELVIN AND ORC ISALES THIS DATE. OSC WELSH WILL SERVE THE PROPERTY OWNER WITH A CLEAN WATER ACT 311C ORDER TO PUMP OUT AND CONTAIN THE OIL FROM THE TWO PITS AND TO HAVE THE OIL FROM EACH OF THE PITS CHARACTERIZED FOR PROPER DISPOSAL. THE WASTE MATERIALS WILL BE STAGED ON-SITE UNTIL THEY ARE PROPERLY CHARACTERIZED FOR DISPOSAL.
- H. THE OSC CONTACTED USCG 2ND DISTRICT TO OBTAIN OPA FUNDING TO RESPOND TO THE POSSIBLE RELEASE. THE OSC OBTAINED FPN NO.088-155 IN THE AMOUNT OF \$10,000 FOR ADMINISTRATIVE ACTIVITIES. IF THE OWNERS DO NOT RESPOND TO THE ORDER IN A TIMELY MANNER OSC DODD IS PREPARED TO ACTIVATE ADDITIONAL FUNDING TO CONTAIN THE OIL ON SITE.
- I. OSC DODD MOBED TO THE SITE UPON RECEIVING NOTIFICATION FROM WVDEP HANDO AND OSC WELSH THAT THE CURRENT OWNER WAS ONSITE THIS DATE AND WAS REPORTEDLY ACTIVELY TRYING TO GATHER 55 GAL DRUMS TO PUMP THE WASTE MATERIAL OUT OF THE PITS FOR TEMPORARY STORAGE. THE OWNER WAS NOT PRESENT. THE OWNER WAS CONTACTED VIA TELEPHONE WITH OSC DODD, OSC WELSH, ORC ISALES AND THE OWNER'S LEGAL COUNSEL TO DISCUSS THE REMOVAL ACTIONS NECESSARY TO MITIGATE THE THREAT POSED BY THE MATERIALS IN THE WASTE PITS. THE OWNER WAS VERBALLY NOTIFIED OF HIS LIABILITY UNDER CWA/OPA TO CLEAN UP THE RELEASED MATERIALS ON THE SITE. OSC DODD DISCUSSED THE IMMEDIATE MEASURES NEEDED TO TAKEN BY THE OWNER, I.E., PUMP OUT THE WASTE PITS INTO A TEMPORARY HOLDING TANK ON-SITE AND COLLECT SAMPLES FOR DISPOSAL CHARACTERIZATION. OSC DODD FURTHER SPECIFIED THAT THE WORK NEEDED TO BE COMPLETED WITHIN A WEEK'S TIMEFRAME, THE WORK MUST BE DONE BY A QUALIFIED INDIVIDUAL OR FIRM AND THAT THE EPA MUST BE NOTIFIED ASAP BUT PRIOR TO THE REMOVAL ACTIVITIES SO THAT EPA CAN PROVIDE OVERSIGHT. THE OWNER WAS ALSO NOTIFIED THAT A WRITTEN 311C ORDER WOULD ALSO BE SENT TO HIM IN THE NEXT COUPLE OF DAYS.
- J. DUE TO OSC WELSH'S UNAVAILABILITY THE NEXT FEW WEEKS, ENFORCEMENT ACTIVITIES WILL BE THE RESPONSIBILITY OF OSC MATLOCK.

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**II FUTURE PLANS**

- A. OSC DODD TO COORDINATE ISSUING OF THE 311C ORDER WITH OSC WELSH/MATLOCK. IF THE OWNERS DO NOT COMPLY, THE OSC WILL ACTIVATE FURTHER OPA FUNDS TO CONTAIN THE OIL ON SITE AND ARRANGE FOR SUITABLE T&D.**
- B. OSC DODD WILL REVIEW THE ASSESSMENT ANALYTICAL UPON RECEIPT FOR POSSIBLE ADDITIONAL REMOVAL ACTIONS.**
- C. OSC DODD TO CONTINUE COORDINATION OF SITE ACTIVITIES WITH USCG, STATE AND LOCAL OFFICIALS.**

**JEFF DODD, OSC  
US EPA REGION III  
WHEELING, WV**

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