

**FEDERAL ON-SCENE COORDINATOR'S
AFTER ACTION REPORT
for
BIG JOHN SALVAGE HOULT ROAD SITE
FAIRMONT, MARION COUNTY, WEST VIRGINIA
September 21, 2001 to August 06, 2003**

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

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

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REGION III

PROJECT

453

CERCLA REMOVAL ACTION
FACT SHEET

SITE: Big John Salvage Hoult Road Site - "Site"

SIZE: Approximately 38 acres

LOCATION: 900 Hoult Road, Fairmont, Marion County, West Virginia

APPROVAL DATE: On September 21, 2001, an Action Memo requesting additional CERCLA funding and exemption from the 12 month and \$2 million statutory limit for removal action was approved by the Director of Hazardous Cleanup Division. Additional CERCLA funding in the amount of \$3 million was approved raising the estimated project ceiling to \$ 4,577,000.

On September 26, 2002, additional funding was approved by the Regional Administrator increasing the project ceiling to \$16,000,000.

PROJECT DATES: Site activities under this removal action occurred between October 15, 2001 and August 06, 2003.

DESCRIPTION: The Big John Salvage Hoult Road Site is located northwest of the Monongahela River at approximately 39.497222° North latitude and 80.123056° West longitude. The elevation is approximately 1,000 feet above mean sea level (msl). Vertical relief across the site is approximately 120 feet. The northeast and southeast area of the site is relatively flat and is sparingly vegetated. The northwest and southwest area of the site is vegetated with trees and shrubs and has steep hillsides sloping towards the Unnamed Tributary #1 and the Monongahela River. *Surface water runoff from the site flows in a southwesterly direction into the Unnamed Tributary #1 through three intermittent tributaries (East Tributary, Middle Tributary, and West Tributary).* Water flowing from the Unnamed Tributary # 1 accumulates in a pond where the sediments settle out and the overflow from the pond drains into the Monongahela River through a pipe buried under the road (rail-to-trail).

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NATIONAL PRIORITIES

On July 27, 2000, the site was listed on the National Priority List (NPL) of the Comprehensive Environmental Response Compensation and Liability Act of 1998 (CERCLA).

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LIST (NPL) STATUS:

The site was proposed to the National Priorities List of the most serious uncontrolled or abandoned hazardous waste sites requiring long term cleanup action on February 4, 2000. The site was formally added to the list on July 27, 2000, making it eligible for federal cleanup funds.

On June 4, 2002, EPA provided the PRPs with special notice letters requesting a meeting to start negotiations for performance of the Remedial Investigation and Feasibility Study (RI/FS). The PRPs declined EPA's request to perform the RI/FS. As a result, EPA is currently planning to perform the RI/FS using Superfund financial resources.

HAZARDOUS MATERIALS:

K-listed waste, coal tar contaminated soil and sediments with [polycyclic aromatic hydrocarbons (PAHs), and benzene, toluene, ethylbenzene, xylene (BTEX)].

QUANTITIES REMOVED:

3,011.65 tons of K-listed waste
194.16 tons of non-hazardous waste (tree stumps and railroad ties)

PROJECT CEILING:

\$16,000,000

PROJECT COSTS:

\$6,607,292

OSC:

Marjorie Easton

ERRS REMOVAL CONTRACTOR:

Guardian Environmental Services, Bear, DE

START CONTRACTOR:

Ecology and Environment, Inc., Wheeling, WV

DISPOSAL LOCATION:

Hazardous solid waste: Ross Incineration Services, Grafton, Ohio, and Onyx Environmental Services, LLC, Port Arthur, Texas
Non-hazardous solid waste: Meadowfill Landfill, Bridgeport, West Virginia

Marjorie Easton, 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 substances 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 John Salvage Hoult Road Site 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 (U.S. EPA), 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.

Marjorie Easton
On-Scene Coordinator
U.S. EPA Region III
Wheeling, West Virginia

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1.0 INTRODUCTION

1.1 Initial Situation

The Big John Salvage Hoult Road Site, hereinafter referred to as "Site," is located at 900 Hoult Road in the town of Fairmont, Marion County, West Virginia. In the past three decades, the site had been a subject of three emergency removal actions (1984, 1991, and 1998) performed by the United States Environmental Protection Agency (EPA) under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA). Despite the three removal actions performed by EPA, the site continued to pose a threat to human health and environment. EPA identified three Potentially Responsible Party's (PRP) on April 26, 2000, and subsequently notified them of their potential liability at the site through a Removal Notice Letter. The PRPs included Reilly Tar and Chemical Corporation (Reilly), Steel Fabricators Inc., and Viacom, Inc. EPA negotiated an Administrative Order on Consent (AOC) with Viacom, Inc., and Steel Fabricators Inc. The AOC directed Steel Fabricators, Inc., to limit unauthorized access to the site by fencing the site and Viacom was directed to remove the glass cullet pile, the cullet pile sedimentation basins, and associated impacted soil. Reilly would not negotiate an AOC. Therefore, on September 29, 2000, EPA issued a Unilateral Administrative Order (UAO), Docket No. III-2000-026-DC, to Reilly.

Cullet removal operation at the site by Viacom, Inc. began on November 01, 2000, and ended on May 25, 2001. Reilly began coal tar removal operation on November 29, 2000. On May 11, 2001, representatives from EPA, West Virginia Department of Environmental Protection (WVDEP), and Reilly met at the site to identify outstanding site removal work addressed under the UAO. During this meeting EPA and WVDEP observed that the Removal Action Plan (RAP) was not fully implemented by the PRP. On May 16, 2001, EPA notified Reilly that the RAP was not completely implemented and certain work still needed to be performed. On June 15, 2001, Reilly responded to EPA indicating they were only willing to conduct a limited amount of the work required by the UAO. On May 16, 2001, EPA notified Reilly and reiterated their requirement to fully implement the RAP. On August 31, 2001, Reilly notified EPA that they were unwilling to undertake the actions necessary to address the items in EPA's May 16, 2001 letter.

Since Reilly refused to fully implement the requirements outlined in the UAO, the Director of Hazardous Sites Cleanup Division signed a request on September 21, 2001, for additional funding and an exemption from the statutory limits to perform a fund lead removal action. EPA's Removal Branch and their contractors mobilized to the site on October 15, 2001 to take over the Reilly removal action.

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1.2 Site Location and Description

The Big John Salvage Hoult Road Site is located at 900 Hoult Road in the town of Fairmont, Marion County, West Virginia. The site location map is enclosed as Appendix 1 and a site layout map is enclosed as Appendix 2. The geographic coordinates of the site are approximately 39.497222⁰ North latitude and 80.123056⁰ West longitude. The site is situated in a light industrial area with a few residential dwellings in close proximity (200 feet) to the site. It is estimated that approximately 3,200 people live within one mile of the site (See Table 4-1). The site encompasses several parcels of land and is owned by different property owners. The site is bordered to the east by the Sharon Steel/Fairmont Coke Superfund Site, to the north by Hoult Road, to the west by the former Creative Labels Plant, and to the southwest by the Monongahela River.

The site is approximately 38 acres in area. The site elevation is approximately 1,000 feet above mean sea level. Vertical relief across the site is approximately 120 feet. The topography of the site varies from flat to steep slopes. The northeast area of the site is relatively flat with light vegetation. The northwest and southwest area of the site is thickly vegetated with trees and shrubs and has steep slopes dipping towards the Unnamed Tributary #1 and the Monongahela River. Surface water runoff from the site drains in a southwesterly direction to the Unnamed Tributary #1 through three intermittent tributaries (East Tributary, Middle Tributary, and West Tributary). Water flowing from the Unnamed Tributary # 1 accumulates in a pond where the sediments settle out and the overflow from the pond drains into the Monongahela River through a pipe buried under the road (rail to trail).

Geologically, the site is located in the Appalachian Plateaus physiographic province. The site is underlain by mostly non-marine cyclic sequences of sandstone, siltstone, shale, limestone and coal of the Pennsylvanian System's Monongahela and Conemaugh Groups. Shale bedrock is exposed in the tributary streams. Coal mining has occurred in the past using both strip mining and deep mining in this area. Bedrock in the regional area strikes approximately North 30° East and is typically only slightly inclined, dipping up to approximately five degrees NW or SE. Area topography reflects a stream-dissected plateau with hillsides having moderate to steeply dipping slopes.

1.3 Site Ownership History

The site encompasses various parcels of land owned by different property owners at various times. Tax Map 04-02 of Winfield City District, Marion County, West Virginia was used to determine the parcels included in the site and their respective property owners. Tax Map 04-02

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is provided as Appendix 4. The following parcels are part of the site and a brief description of the parcel ownership history is provided.

Parcel 7.1

This parcel is 6.476 acres in area and Steel Fabricators, Inc., currently owns this property by Tax Deed made on November 14, 1997, and recorded in Deed Book 943, page 809. Steel Fabricators, Inc., was the highest bidder on the property at a sale held by the Deputy Land Commissioner for delinquent real estate taxes of the years of 1989 through 1997. The taxes went delinquent in the name of Big John's Salvage. Big John's Salvage purchased the property from Reilly Tar & Chemical Corporation by deed made May 1, 1973, and recorded in Deed Book 773, Page 261. Reilly Tar & Chemical Corporation was granted the property from The Reilly Corporation by deed recorded in Deed Book 364, Page 78. The deed was signed by the Reilly Company's President on December 29, 1933, and signed by the Marion County Clerk on May 1, 1941. The Reilly Corporation's name was changed several times between the years of 1928 and 1933. Reilly Corporation's original name was the F. J. Lewis Manufacturing Company. The F. J. Lewis Manufacturing Company purchased the property from William H. & Edna M. Lewis by deed made on October 24, 1925, and recorded in Deed Book 274, Page 396.

Parcel 9

Monongahela Railroad Company is currently being assessed for this property. No actual documentation of how Monongahela Railroad Company was granted the property could be found.

Parcel 10

This parcel is 1.01 acres in area. This parcel has two portions with approximately 0.6280 acres (area A) and 0.3837 acres (area B)¹ in area.

Parcel 10, Area A

Richard E. Lash currently possesses ownership of the property through the will of John J. Vincent, Jr., made on October 6, 2001, and recorded in Will Book 106, Page 1068, in which he appointed said Richard E. Lash Executor of his estate. Within the will it states John J. Vincent, Jr. purchased the property by Tax Deed made on November 4, 1992, and recorded in Deed Book 906, page 915. John J. Vincent, Jr. was the highest bidder on the property at a sale held by the Deputy Land Commissioner for delinquent real estate taxes of the years of 1989 through 1991. The taxes went delinquent in the name of Big John's Salvage. Big John's Salvage purchased the property from Reilly Tar & Chemical Corporation by deed made May 1, 1973, and recorded in

¹The division of parcel 10 into area A and area B is done strictly to present and clarify the site ownership history. Tax Map 04-02 does not divide Parcel 10 as area A and area B.

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Deed Book 773, Page 261. Reilly Tar & Chemical Corporation was granted the property from The Reilly Corporation by deed recorded in Deed Book 364, Page 78. The Reilly Corporation's name was changed several times between the years of 1928 and 1933. Reilly Corporation's original name was the F. J. Lewis Manufacturing Company. The F. J. Lewis Manufacturing Company purchased the property from William H. & Edna M. Lewis by deed made on October 24, 1925, and recorded in Deed Book 274, Page 396.

Parcel 10, Area B

Richard E. Lash currently possesses ownership of the property through the will of John J. Vincent, Jr. in which he appointed said Richard E. Lash Executor of his estate. Within the will it states John J. Vincent, Jr. purchased the property by Tax Deed made on November 4, 1992, and recorded in Deed Book 906, page 913. John J. Vincent, Jr. was the highest bidder on the property at a sale held by the Deputy Land Commissioner for delinquent real estate taxes of the years of 1989 through 1991. The taxes went delinquent in the name of Big John's Salvage. Big John's Salvage purchased the property from Reilly Tar & Chemical Corporation by deed made May 1, 1973, and recorded in Deed Book 773, Page 261. Reilly Tar & Chemical Corporation was granted the property from The Reilly Corporation by deed recorded in Deed Book 364, Page 78. The Reilly Corporation's name was changed several times between the years of 1928 and 1933. Reilly Corporation's original name was the F. J. Lewis Manufacturing Company. The F. J. Lewis Manufacturing Company purchased the property from William H. & Edna M. Lewis by deed made on October 24, 1925, and recorded in Deed Book 274, Page 396.

Parcel 12

B. & O. Railroad is currently being assessed for this property. No actual documentation of how B. & O. Railroad was granted the property could be found.

Parcel 13

This parcel is 21.53 acres in area and Green Bluff Development, Inc., currently owns this property by Corrective Deed made on September 12, 2001, and recorded in Deed Book 971, page 508. FAC, Inc., was the grantor on the Corrective Deed and originally granted the property to Green Bluff Development, Inc., by Deed made on June 15, 1998, and recorded in Deed Book 948, page 57. FAC, Inc., received the property from its parent company Sharon Steel Corporation by Deed made on December 28, 1990, and recorded in Deed Book 894, page 199. This Deed relates to a bankruptcy filing of the Sharon Steel Corporation in which all the property attached to said deed is transferred to its subsidiary FAC, Inc. Sharon Steel Corporation purchased the property from Domestic Coke Corporation by Deed made on January 31, 1948, and recorded in Deed Book 454, Page 402. Domestic Coke Corporation purchased the property from Clyde H. & Grace B. Brandli and George L. & Madge Brandli by Deed made on May 31, 1928, and recorded in Deed Book 291, Page 19.

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Parcel 14

This parcel is 14.035 acres in area and Steel Fabricators, Inc., currently owns this property by Tax Deed made on November 14, 1997, and recorded in Deed Book 943, page 813. Steel Fabricators Inc., was the highest bidder on the property at a sale held by the Deputy Land Commissioner for delinquent real estate taxes of the years of 1989 through 1997. The taxes went delinquent in the name of Big John's Salvage. Big John's Salvage purchased the property from Reilly Tar & Chemical Corporation by deed made May 1, 1973, and recorded in Deed Book 773, Page 261. Reilly Tar & Chemical Corporation was granted the property from The Reilly Corporation by deed recorded in Deed Book 364, Page 78. The Reilly Corporation's name was changed several times between the years of 1928 and 1933. Reilly Corporation's original name was the F. J. Lewis Manufacturing Company. The F. J. Lewis Manufacturing Company purchased the property from William H. & Edna M. Lewis by deed made on October 24, 1925, and recorded in Deed Book 274, Page 396.

1.4 Site Operations History

Reilly Industries, Inc. (RII) formerly known as Reilly Tar and Chemical Corporation (Reilly) owned and operated a coal-tar refinery at the site from approximately 1932 to 1973. Approximately 12,000 gallons per day of crude tar waste from the nearby Domestic Coke Corporation and the Dupont Coke plant at Belle were processed at the site (Watson, 1940). Crude tar was pumped from tank cars to storage tanks, and later separated by distillation and condensation processes. Creosote product was removed, stored, and sold as wood preserving compound. Acid oil was removed and treated at an extraction unit to remove phenol, and the tar was sold to the state road commission for road application purposes. The oil was then cooled to remove naphthalene which was stored on site. The remaining crude acids were shipped off site to plants owned by Reilly at different location for final processing.

Wastes generated during the above mentioned years were retained in a pond near the southern property line. This pond also received wastes from three on-site sewers and several drainage ditches. All cooling waters, acid wastes, and tar wastes were supposed to pass through the pond. Discharge from the retention pond flowed through a pipe located in the center of the pond which emptied into the Unnamed Tributary #1 and then to the Monongahela River (Watson, 1940).

In January of 1973, Big John's Salvage, Inc., purchased the property from Reilly. Big John's Salvage, Inc., owned and operated a metal, glass and oil salvaging operation at the site. Big John's Salvage Inc., was contracted by Westinghouse Electric Corporation (WEC) to transport, treat, store and dispose materials containing hazardous substances from its plant located in Fairmont, West Virginia (Hirsh, 1982). WEC also hired Big John's Salvage, Inc. to transport,

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treat, and dispose fluorescent light bulbs and/or glass cullet. Westinghouse Electric Corporation later changed name to CBS Corporation and was merged with Viacom Inc.

Drum salvaging operations at the site by the Big John's Salvage, Inc., reportedly consisted of emptying the contents of the drums into holding tanks located at the site. The emptied drums were rinsed and were reportedly transported to the Dakota Drum Site located in northeast Fairmont and/or to a property located on Route 250 in Fairmont, where they were crushed and sold as scrap (U.S. EPA, 1985). The owner of the Dakota Drum Site, Mr. John Boyce, was also the owner of the Big John Salvage, Inc. The glass cullet transported from Westinghouse Plant was staged on site. On June 11, 1984, Big John's Salvage, Inc., filed for bankruptcy under Chapter 11 of the Bankruptcy Act. On November 14, 1997, the title of the property was transferred to Steel Fabricators, Inc. The property was used by Steel Fabricators, Inc., for logging operations.

1.5 Site Regulatory History

In December 1940, The West Virginia Department of Health (WVDH) investigated Reilly in response to phenol and tar contamination at the Morgantown water plant (Watson, 1940). Reilly was a potential source for phenol and tar contamination in the Monongahela River between Buffalo Creek and the Morgantown water plant. Samples collected from the Unnamed Tributary #1 by the WVDH contained phenol ranging from 117 to 287 parts per million (ppm). In March of 1944, samples collected from the discharge point of Unnamed Tributary #1 by the WVDH, indicated phenol concentration of 308 ppm (Kelso, 1944).

In 1957, following requests from the WVDH, Reilly planned to install hay bales to its discharge system to reduce the releases of phenols and other wastes from the site. Letters of correspondence between the West Virginia State Water Commission (WVSWC) officials indicate that hay bales were never installed (Akers, 1958).

In January of 1960, approximately 20,000 gallons of coal tar spilled at the site and subsequently flowed into the Monongahela River (Neri, 1960). In April 1962, the WVSWC received complaints from employees at Lock 15 located approximately half a mile downstream of the site. The employees complained of coal tar accumulating at the lock. In 1964, Reilly constructed a tank to improve its waste handling procedures. In 1968, inspections conducted by the U.S. Army Corps of Engineers (USACOE) confirmed that the waste handling procedures were improved and no evidence of release was observed (Steinberg, 1968). During the modernization of the West Virginia portion of the Monongahela River, Lock 15 was replaced by the Opekiska Lock and Dam constructed during 1961 to 1964 (www.lrp.usace.army.mil/nav/opek.htm, 2004). Opekiska Lock and Dam is located approximately 9.4 miles downstream of the site.

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In August of 1971, the West Virginia Department of Natural Resources (WVDNR) collected several surface water samples from the Unnamed Tributary #1 and from the Monongahela River.

A sample collected from the Unnamed Tributary #1 adjacent to the Reilly discharge point indicated phenol concentration of 3,329,667 parts per billion (ppb). A sample collected from the confluence of the Unnamed Tributary #1 and the Monongahela River indicated phenol

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concentration of 25,197 ppb. A sample collected from the Monongahela River downstream of Unnamed Tributary #1 contained phenol concentration of 5,909 ppb (Weston Inc., 1999).

In December of 1982, EPA learned wastes from the nearby WEC were being processed by Big John Salvage, Inc., at the site. These wastes included waste oils containing mercury. Typical mercury concentration ranged from 0.9 to 18.8 milligrams per Liter (mg/L) at various depths of a drum containing waste oil. WEC subsequently terminated the transfer of mercury containing wastes to the site and began using a recycler Mercury Refining Company from Albany, NY. Non hazardous waste, however, continued to be sent to the site (Hirsh, 1982).

In July of 1983, EPA's Technical Assistance Team (TAT) and the Emergency Response Team (ERT) collected tar, surface water, sediment, and biological samples from the site. The following compounds were detected in the soil samples collected from the site near the coal tar deposits: naphthalene (4,200 ppm), acenaphthylene (370 ppm), acenaphthene (2,400 ppm), fluorene (3,900 ppm), fluoranthene (4,600 ppm), phenanthrene (11,000 ppm), pyrene (4,200 ppm), chrysene (700 ppm) and ethylbenzene (15,000 ppm). The following compounds were detected in sediments samples collected at the confluence of the Unnamed Tributary #1 and the Monongahela River: acenaphthylene (2.1 ppm), chrysene (4.0 ppm), fluoranthene (7.6 ppm), and phenanthrene (10.3 ppm). Samples collected from the cullet piles contained elevated levels of lead and mercury (U.S. EPA, 1985).

Following a site investigation in July of 1983, EPA issued a Unilateral Order on November 22, 1983, to Big John Salvage Inc., to gain access to the site and permission for removal activities (U.S. EPA, 1983). Subsequently, EPA and Big John Salvage Inc., negotiated and signed a Consent Order on January 09, 1984 (U.S. EPA, 1984). The PRP began site cleanup to comply with the Consent Order. On April 25, 1984, EPA conducted a site inspection to ensure the PRP's compliance with the Consent Order. EPA discovered that the PRP had not fully complied with the work order and instructed the PRP to comply with the Consent Order. On May 16, 1984, Big John Salvage Inc., informed EPA that the company had filed for bankruptcy under Chapter 11 of the Bankruptcy Act. On July 17, 1984, EPA issued notice letters to the PRPs (Big John Salvage Inc., Westinghouse, and Reilly Tar and Chemical Company). Big John Salvage Inc., informed EPA that they would pursue cleanup actions on the cullet pile. Reilly Tar and Chemical indicated that they would conduct site cleanup attributable to their past operations onsite. Westinghouse refused to take any action. Cleanup operations by Reilly Tar and Chemical Company commenced on November 01, 1984. Big John Salvage Company did not remove the glass cullet pile. Under the supervision of EPA, Reilly completed removal operations on April 26, 1985.

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Subsequently two additional removal responses (November 22, 1991, through March 31, 1993, and May 08, 1998, through December 17, 1998) were conducted by EPA under CERCLA (U.S. EPA, 1993 and U.S. EPA, 1998).

A Site Inspection (SI) was conducted in March of 1999 to provide information for the evaluation of suspected contamination sources and targets (Weston Inc., 1999). Information generated during this SI was used to indicate the nature of contamination, the relative hazards posed by sources, and impacts to targets. A site reconnaissance conducted in March of 1999 by the Site Assessment and Technical Assistance (SATA) team identified contaminated soils, coal tar, glass cullet piles, and a settling pond. SATA concluded that surface soils at the site were contaminated, including 2,500 square feet of coal tar contaminated soils along the east portion of the property. The volume of glass cullet piles were estimated at 360 cubic yards. SATA collected surface water, sediment, soil and bulk samples from the site. Surface soils and sediments from the settling pond were characterized by elevated levels of PAHs and heavy metals including mercury and lead. Coal tar seeps were characterized by high PAH levels. A PREscore evaluation of the site based on the sampling event indicated a score higher than the minimum value required for further evaluation under CERCLA.

1.5.1 Previous CERCLA Emergency Responses / Removal Actions

1.5.1.1 Removal Response - July 24, 1984 through April 26, 1985

On January 09, 1984, a Consent Order was negotiated between Big John Salvage Inc., and EPA. The Consent Order directed the PRP to remove the glass cullet pile and secure/stabilize the tanks located on site. Big John Salvage Inc., began site operations to comply with the Consent Order. On April 25, 1984, EPA conducted a site inspection to ensure the PRP's compliance with the Consent Order. The PRP had addressed some of the requirements of the Consent Order including removal of drums, cleaning out of the oil/water separator, and enlargement of the berm around the cullet pile. However, EPA discovered that the PRP had not fully complied with the work order and instructed the PRP to fully comply with the Consent Order. On May 16, 1984, Big John Salvage Inc., informed EPA that the company had filed for bankruptcy under Chapter 11 of the Bankruptcy Act. On July 17, 1984, EPA issued notice letters to the PRP's (Big John Salvage Inc., Westinghouse, and Reilly Tar and Chemical Company). Big John Salvage Inc., informed EPA that they would attempt to salvage the cullet pile. However Big John Salvage Inc., did not follow up on the Consent Order. WEC refused to take any action. EPA obtained CERCLA funds in case the PRP did not perform the cleanup and to conduct an extent of contamination study to be performed by the Environmental Response Team (ERT).

Reilly Tar and Chemical Company indicated that they would conduct site cleanup attributable to

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their past operations onsite (U.S. EPA, 1984a). Cleanup operations by Reilly Tar and Chemical Company commenced on November 01, 1984. Under the supervision of EPA, Reilly completed removal operations on April 26, 1985. Reilly removed 4,100 tons of coal tar waste solids and shipped for disposal at Fondersey Enterprises, Oregon, Ohio under RCRA ID No. OHD045243706. Reilly also removed 18,500 tons of liquid non-hazardous waste and shipped for disposal at the DuPont Water Treatment Plant, Deepwater, New Jersey.

1.5.1.2 Removal Response - November 22, 1991 through March 31, 1993

On November 21, 1991, EPA Region III, OSC Jamie Fenske, was notified by WVDNR of several drums containing potential hazardous materials located on the Big John Salvage Site. On December 10, 1991, EPA's TAT collected samples from the drums located on site. The analytical results from the sampling event confirmed that the drums contained flammable and combustible materials, and several boxes containing friable asbestos.

On May 05, 1992, a site reconnaissance was conducted by TAT. On May 15, 1992, based on the analytical results from the sampling event, a report indicating that a resident had been injured onsite, and unrestricted access to the site, OSC William Steuteville determined that an imminent and substantial threat was posed by the conditions of the site and obligated CERCLIS funds not to exceed \$50,000 for emergency removal operations. On September 11, 1992, the Acting Regional Administrator, Mr. William Wisniewski approved an additional funding request for the site in the amount of \$318,476. The Emergency Response Cleanup Services (ERCS) contractor, Environmental Technologies, Inc., performed removal operations. All drums that contained hazardous waste were overpacked and shipped off site for disposal. A total of 129 overpacks of hazardous waste were shipped to disposal facilities. The disposal facilities included, Clean Harbors, Baltimore, Maryland; Chemical Conservation Corporation, Valdosta, Georgia; Laidlaw Environmental Services, Reidsville, North Carolina; and GSX Services of South Carolina, Pinewood, South Carolina. Thirty-nine cubic yards of asbestos were disposed of at S&S Landfill, Clarksburg, West Virginia. Removal operations ended on March 31, 1993.

1.5.1.3 Removal Response - May 08, 1998 through December 17, 1998

In March of 1998, WVDEP's Resource Conservation Recovery Act (RCRA) Inspector, John Hando, discovered that a previously empty 20,000 gallon vertical tank had been removed from the site and had been transported to the adjacent Sharon Steel Superfund Site. WVDEP also observed two large excavated pits on the Big John Salvage Site containing used oil. The City of Fairmont and WVDEP representatives were concerned by the site operations being conducted by Steel Fabricators, Inc., and the consequent potential release of hazardous substances from the site to the Monongahela River. On April 07, 1998, EPA Region III, OSC Jeff Dodd, was notified by

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WVDEP of the excavated pits and requested an investigation. OSC Dodd contacted United States Coast Guard (USCG) 2nd District to obtain funding under the Oil Pollution Act 1990. The funding was initially approved for \$10,000. On May 08, 1998, EPA's SATA team collected samples from the excavated pits and various other areas of the site. Removal operations began on May 20, 1998. ERRS pumped the contaminated oil into a frac tank and stabilized the saturated soil around the contaminated oil pits. Analytical results from the May 8th sampling event confirmed the presence of highly degraded motor oil and waste anti-freeze in the excavated pits. The data also indicated the presence of several CERCLA hazardous substances. OSC Dodd determined that CERCLA funding was more appropriate to address the removal action because of the presence of CERCLA hazardous substances. On August 10, 1998, OSC drafted a Special Bulletin A and activated \$200,000 in CERCLA funding to continue removal action on the site. ERRS completed removing the waste oil from the excavated pits and stabilized the oil saturated soil surrounding the pits by adding cement kiln dust. Approximately 10,413 gallons of waste oil were collected and transported to Ross Incineration, Grafton, OH. Approximately 521 tons of non-hazardous stabilized soil was transported to Meadowfill Landfill, Bridgeport, WV. On December 17, 1998, the removal action was completed.

1.6 Efforts to Notify and Compel Potentially Responsible Parties to Respond

Based on the 1999 SI, EPA concluded that removal work needed to be performed at the site. On April 26, 2000, EPA identified three PRPs and notified them of their potential liability at the site through a Removal Notice Letter. The PRPs included Reilly Tar and Chemical Corporation, Steel Fabricators Inc., and Viacom Inc. On September 06, 2000, EPA negotiated an AOC with two of the three PRPs namely Viacom, Inc., and Steel Fabricators Inc., to cleanup the cullet and associated contamination from the cullet (U.S. EPA, 2000). Reilly would not negotiate an AOC. Therefore, on September 29, 2000, EPA issued a UAO to Reilly. The AOC and UAO directed the type of work that must be conducted by the PRPs under EPA supervision to remove the imminent and substantial threat.

Steel Fabricators Inc., and Viacom Inc., submitted a RAP to EPA on September 26, 2000, and it was approved by EPA on October 18, 2000. Cullet removal operation at the site by the PRPs began on November 01, 2000, and ended on May 25, 2001. In August 2001, EPA reviewed and approved the Final Report for the cullet removal conducted under the AOC.

Reilly submitted a draft RAP to EPA on October 16, 2000, and the RAP was approved by EPA on November 16, 2000. Removal operation at the site by Reilly began on November 29, 2000. On May 11, 2001, representatives from EPA, WVDEP, and Reilly met at the site to identify outstanding removal work at the site addressed under the UAO. During this meeting EPA and WVDEP observed that the RAP was not fully implemented by the PRP. On May 16, 2001, EPA

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notified Reilly that the RAP was not completely implemented and certain work still needed to be performed as part of the RAP. On June 15, 2001, Reilly responded to EPA indicating they were only willing to conduct a limited amount of the work required by the UAO. Reilly responded verbally on August 30, 2001, and in writing on August 31, 2001, that they were unwilling to undertake the actions necessary to address the items in EPA's May 16, 2001 letter. Due to the Reilly's refusal to fully implement the requirements outlined in the UAO, the Director of Hazardous Sites Clean Up Division signed a request on September 21, 2001, for additional funding and an exemption from the statutory limits to perform a fund lead removal action. EPA's Removal Branch and their contractors mobilized to the site on October 15, 2001, to take over the Reilly removal action.

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 (3HS31) 303 Methodist Building 11 th & Chapline Street Wheeling, WV 26003 (304) 234-0251	Marjorie Easton, OSC Jack Downie, OSC Dennis Matlock, OSC	Coordinated site activities between federal, local, and state officials. Directed the scope of work for cleanup and technical assessment contractors throughout the project.
U.S. Environmental Protection Agency, Region III Senior Site Administrative Officer(3HS30) 401 Methodist Building 11 th & Chapline Street Wheeling, WV 26003 (304) 234-0239	Rich Messimer, SSAO	Conducted oversight and management of financial and administrative activities at the site.
U.S. Environmental Protection Agency, Region III General Remedial Section	Christian W. Matta, RPM	Coordinated site activities between Removal and Remedial

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AGENCY	CONTACT	BRIEF DESCRIPTION OF DUTIES
(3HS23) 1650 Arch Street Philadelphia, PA 19103-2029 (215) 814-2317		Sections of EPA, Region III.
West Virginia Department of Environmental Protection (WVDEP) Office of Waste Management Compliance Assurance and Emergency Response 2031 Pleasant Valley Rd, Ste #1, Fairmont, WV 26554-9295 (304) 368-3950	John Hando, PhD RCRA Inspector	Provided site background information. Conducted sampling of railroad ties located on site and water up gradient of the site.
West Virginia Department of Environmental Protection (WVDEP) Office of Environmental Remediation 1356 Hansford Street Charleston, WV 25301 (304) 558-2508 Ext. 306	Tom Bass, RCRA Inspector	Provided site background information. Coordinated site activities between WVDEP and EPA.
Ecology and Environment, Inc. Superfund Technical Assessment and Response Team (START) 131 Peninsula St., Suite B Wheeling, WV 26003 (304) 231-1176	Suddha Graves Younus Burhan	Provided technical assistance, photographic and written documentation, multi-media sampling, health and safety monitoring, cost tracking, and GIS support.
Guardian Environmental Services, Inc. Emergency and Rapid Response	Jack Wilson, Response Manager	Performed site removal operations. Conducted excavation, backfilling,

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AGENCY	CONTACT	BRIEF DESCRIPTION OF DUTIES
Services (ERRS) 1280 Porter Road Bear, DE 19701 (302) 834-1000		pumping, and restoration activities. Coordinated transportation and disposal of contaminated soils and sediments to approved disposal facilities.
Capitol Environmental Service, Inc. Trolley Square, Suite 15 C Wilmington, DE 19806 (302) 652-8999	Kim Swann Project Manager	Subcontractor for Guardian Environmental Services, Inc. Provided off-site disposal of K-listed waste.
The Sanitary Sewer Board, City of Fairmont P.O. Box 1428 Washington Street Extension Fairmont, WV 26555-1428 (304) 366-0540	Fred Roman	Provided guidance to sample the pond water in order to discharge the pond water to the city sewer system. Oversaw the sampling of the pond water as part of the requirement to obtain discharge permit.
City of Fairmont City Hall 200 Jackson Street Fairmont, WV 26554 (304) 366-6211	Nick Fantasia Mayor Bruce McDaniel City Manager Anthony Horton Building Inspector	City mayor for the City of Fairmont. City manager for the City of Fairmont. Coordinated an inspection of a dilapidated building located onsite.
Steel Fabricators, Inc. P.O. Box 2173 Fairmont, WV 26555	John E. Morgan	Current property owner

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AGENCY	CONTACT	BRIEF DESCRIPTION OF DUTIES
Potesta & Associates, Inc. University of Charleston Cox Hall 2300 MacCorkle Avenue, SE Charleston, WV 25304 (304) 342-1400	Vick Dawson Colin Mitchell	Sub-contractor to START. Surveyed the site in order to determine the boundaries of the site and different parcel located on site. Provided electronic copies of survey map.
Environmental Strategies, Corp. 300 Corporate Center Drive Suite 200 Moon Township, PA 15108 (412) 604-1040	Douglas B. Taylor Cheyne Gross	Sub-contractor to PRP (Reilly). Monitored and maintained the PRP's water treatment system.
Shaw Environmental & Infrastructure, Inc. 200 Horizon Center Blvd. Trenton, NY 08691 (609) 588-6347	John W. Blankenship	ERRS contractor.
Global Remediation Superfund Exxon Mobil Refining & Supply Company 1900 East Linden Ave. P.O.Box 728 Linden, NJ 07036 (908) 474-7395	Arthur E. Chin, PhD	Representative of Exxon Mobil Refining & Supply, PRP of Sharon Steel Superfund Site.
Kipin Industries, Inc. 4194 Green Garden Road Aliquippa, PA 15001 (724) 495-6200	Peter Kipin Gary Okey	Remediation technology consultant.

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AGENCY	CONTACT	BRIEF DESCRIPTION OF DUTIES
Petroleum Recyclers, Inc. 83 Clarksburg Road Buckhanon, WV 26201 (304) 472-5806	Howard Barlow	Sub-contractor to ERRS. Pumped and disposed the contents (gasoline and diesel fuel) of two abandoned tanks.
AMI Demolition and Environmental Contracting 192 Vista Del Rio Morgantown, WV 26508 (304) 292-1659	Joe Jordan	Sub-contractor to ERRS. Asbestos contractor. Removed the asbestos found in the building located on site.
R&J Waters <i>1654 E Roy Furman</i> <i>HwyCarmichaels, PA</i> <i>15320-2415(724)</i> <i>966-2040</i>	Ron Waters	Subcontractor to ERRS. Provided services to drain and discharge the pond water
Dalton's Service Company 1230 Mercer Road Ellwood City, PA 16117 (724) 752-4545	Joe Dalton	Subcontractor to R&J Waters.

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2.2 Organization of the Response

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3.0 NARRATIVE OF EVENTS

On September 21, 2001, an Action Memo requesting additional CERCLA funding and exemption from the 12 month and \$2 million statutory limits was approved. Additional CERCLA funding in the amount of \$3 Million was approved raising the estimated Project Ceiling to \$4,577,000.00. On October 03, 2001, EPA, WVDEP, START, and ERRS, conducted a site reconnaissance. On October 15, 2001, START and ERRS mobilized to the site to commence removal activities.

Site setup, clearing, grubbing, and disposal of non hazardous waste

ERRS began setting up trailers to be used as command posts and equipment storage area. Utilities were hooked up to the site. ERRS contracted a security agency to provide site security during nonworking hours. ERRS began mobilization of heavy equipment to the site. The access road to the site was widened and additional roads onsite were graded and gravel spread over the roads. ERRS began clearing and grubbing of the site in order to visually determine the amount of contamination on the site. Large amounts of debris and remediation supplies belonging to the PRP were spread haphazardly on site. Much of this debris covered contaminated soils. Concrete waste material, tires, conveyor belts, railroad ties and metal debris were segregated and staged in respective waste piles. The railroad ties were sampled and analyzed for the presence of organic and inorganic contaminants by WVDEP for disposal purposes. The results from the analysis indicated that the railroad ties were nonhazardous and were shipped to Meadowfill Landfill, Bridgeport, West Virginia for disposal. Other nonhazardous wastes (tires, conveyor belts, and metal debris) were also shipped to Meadowfill Landfill for disposal. Table 3-1, Summary of Non Hazardous Materials Shipped Off Site for Disposal, lists the materials shipped off site for non hazardous disposal. The trees and brush garnered during the clearing and grubbing operation were chipped using a mechanical chipping machine. The chips were later spread on seeded backfilled areas as soil cover.

Consolidation and disposal of contaminated soil excavated by Reilly

During the previous removal activities conducted by Reilly, excavated contaminated soil was staged on site in five different stockpiles. The contaminated soil was classified as a RCRA K-listed waste by the WVDEP. These piles were haphazardly located in different areas of the site and coal tar was observed seeping out of these piles. These piles did not have any containment or adequate cover, thereby actively releasing the contaminants to the surrounding environment. Soil samples collected by START indicated the material releasing from the piles contained high levels of various PAH compounds and other associated volatile compounds such as benzene. ERRS began consolidating the five stockpiles into one large stockpile in the northern area of the site. The consolidated pile was later separated into smaller piles of 100 Cubic Yards (CY) each

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for ease of sampling and disposal. ERRS contracted a disposal contractor to sample and dispose the K-listed waste. Approximately 3,000 tons of K-listed waste was shipped off site for disposal. These waste were shipped to Ross Incineration Services, Grafton, Ohio and Onyx Environmental Services, Port Arthur, Texas.

Excavation and backfilling of coal tar contaminated area

After clearing and grubbing the site, ERRS began excavating visible coal tar contaminated soil. The contaminated soil was transported and staged in the northern area of the site. The staging area was lined with visqueen to prevent underground migration of the contaminants. After the visible contamination was removed, test pits were dug at various locations up to a depth of 12 feet bgs to determine if contamination was present at depth. When the test pits indicated soil contamination, the surrounding areas were excavated and backfilled with uncontaminated soil. This technique of using test pits to determine the depth of contamination was employed throughout the site. The excavated areas were backfilled with clean soil and graded to promote natural site drainage. Overburden soil encountered during excavation that was not visibly contaminated and mixed with debris was transported to the northwest area of the site. This clean overburden soil was sifted using an industrial sifter to remove debris and was then used to backfill the excavated areas of the site. Prior to backfilling the excavated areas, START collected soil samples from random areas of the bottom of the excavated areas to analyze for TCL Organics and TAL Metals.

On February 05, 2002, during excavation in the northwest area of the site, a large underground rectangular structure was discovered. The structure was approximately 30 feet long, 20 feet wide and 4 feet deep. Glass cullet and perched water filled the structure. Coal tar was observed in the surrounding soils. A steel pipe of approximately 18" diameter drained the contents of the structure to the ravine area (West Tributary). The structure appeared to be used as a wash basin for the former glass cullet operations. The steel walls and the pipes extending from the wash basin were excavated. The location of the wash basin was recorded using a GPS and the contaminated soil was left intact to be removed by future remediation response.

On June 04, 2002, ERRS unearthed a rectangular concrete structure approximately 60 feet southeast of the abandoned building. The structure was filled with bricks, had many small pipes leading into it, and had perched water in it. Coal tar contamination surrounded the structure. On June 05, 2002, ERRS unearthed a tank just 20 feet east of the concrete structure. The tank was approximately 65 feet long, 10 feet wide, and 4 feet deep. The tank appeared to be an old railcar and the top half of the tank had been cut off. Large amounts of coal tar, bricks, pipes, and railroad ties were present in the tank and in the surrounding soils. ERRS removed the contents and excavated the tank. The tank was later power washed, cut into pieces and disposed as non hazardous waste.

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Two underground storage tanks were discovered adjacent to the concrete shed located on site. On November 13, 2002, ERRS excavated the surrounding soils from the underground storage tanks located west of the concrete shed. The location of the tanks were recorded using a GPS unit. One tank contained approximately 65 gallons of gasoline, while the other tank contained approximately 2,700 gallons of diesel. The tanks appeared to be in good condition and were not leaking. On November 14, 2002, Petroleum Recyclers arrived onsite and pumped the contents of the underground storage tanks, a total of approximately 2,765 gallons of gasoline and diesel fuel. ERRS removed the tanks from the ground, staged them in the west area of the site, and backfilled the excavated area.

After excavation of contaminated soil and backfilling of the site, topsoil was spread on the excavated areas. The area was seeded and hay was spread on the seeded area.

Excavation of concrete pads and impacted soil

Numerous concrete pads with coal tar seeping from the periphery were located onsite. ERRS broke the concrete pads into manageable pieces using a jackhammer attached to a backhoe. The broken concrete pieces were then transported to a washing station where they were power washed in order to remove coal tar from them. The power washed concrete pads were staged in the east area of the site. The contaminated soil encountered during excavation of concrete pads was staged in stockpiles. The excavated areas were backfilled with clean backfill. Test pits were dug in the area around the concrete pads to determine the presence of contaminated soil. The areas were backfilled with soil when the test pits indicated no visible contamination. When the test pits indicated soil contamination, the surrounding areas were excavated and backfilled with uncontaminated soil. The excavated contaminated soil was staged onsite for later disposal.

Site Survey

On February 02, 2002, START was tasked by the OSC to survey the site. START subcontracted the survey work to Potesta and Associates (Potesta). On April 02, 2002, Potesta began a survey of the site. A final survey map was generated by Potesta showing different parcels included in the site, site boundaries, landmarks and site topography. A copy of the site survey map is provided as Appendix 3.

Demolition of onsite building and asbestos removal

During the excavation process of the contaminated soil in the east area of the site, it was discovered that coal tar contamination extended under the road and under the abandoned building located on site. The abandoned building was structurally unsound and any excavation activities in close proximity to the building posed a danger to the excavation crew. On December 12, 2001, Mr. Anthony Horton from the City of Fairmont, inspected the building and determined that

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the building must be condemned due to its poor structural integrity. The City of Fairmont issued a notice to the property owner, Mr. John E. Morgan of Steel Fabricators Inc., that the building was condemned and should be demolished. Mr. Morgan was given 60 days to respond to the notice. On April 02, 2002, three representatives from Steel Fabricators Inc., arrived on site to examine the building. Mr. Morgan signed the consent to demolish the building and agreed to move certain items out of the building. It was suspected that the abandoned building had asbestos. On April 09, 2002, ERRS collected three samples to be analyzed for asbestos. The results of the analysis indicated that the building had asbestos. ERRS contracted AMI Demolition and Environmental Contracting (AMI) to remove the asbestos from the building. On June 15, 2002, AMI arrived on site and removed the asbestos from the building. ERRS began demolition of the building on June 17, 2002. Debris (concrete, steel, and brick) originating from the demolition of the building was separated and staged on site. The concrete floor was removed using a jack hammer and the coal tar contaminated soil was excavated and staged in the stockpile for future disposal.

Construction of clay barrier northwest of East Tributary's manhole

The area above the hill located northwest of the East Tributary's manhole was highly contaminated with coal tar. Test pits were dug in this area to determine the depth of contamination. Test pits indicated contamination to a depth greater than 15 feet. Based on the impracticality of excavating the amount of contaminated soil in this area, it was determined that the contamination should be left in place and a vertical trench (400 feet long, 15 feet deep and 3 feet wide) surrounding the contaminated area was excavated and filled with clay material. The clay barrier would minimize the migration of coal tar into the Unnamed Tributary #1. The clay barrier was completed on November 15, 2002.

Construction of access road along the Unnamed Tributary #1

ERRS constructed an access road along the Unnamed Tributary # 1 in order to access and remove contaminated sediments from the tributary. The area around the meandering Unnamed Tributary #1 was surrounded by steep slopes, heavy brush and trees. These factors made it very difficult for heavy equipment to access the tributary bed. Therefore a road was constructed along the tributary. This road was used to transport contaminated sediments during the excavation of sediments from Unnamed Tributary #1 and from the pond. ERRS installed silt fence and hay bales along the newly constructed road to minimize migration of silt to the Unnamed Tributary # 1. During the ongoing removal operations, the drainage pipes of the pond located at the end of the Unnamed Tributary #1 were filled with debris and were becoming clogged. The debris from the pond was removed and screens were installed at the mouth of the pipes. The screens prevented further clogging of the pipes and thereby reduced the risk of any damage to the embankment caused by excessive accumulation of surface runoff.

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Additional Funding Request

As the removal operations continued, new areas of coal tar contamination were discovered. The newly discovered contaminated areas continued to pose a threat to public health and ecological receptors on site, surface water tributaries and the Monongahela River. Site conditions continued to meet the criteria for a Removal Action and funds allocated to this removal action were depleting. Therefore, the OSC drafted another Action Memo requesting additional funds in order to continue the removal action and to address the excavation and disposal of newly discovered contamination. On November 01, 2002, the Director of Hazardous Sites Cleanup Division signed a request for additional funding and an exemption of the 12 month and \$2 million statutory limits for a removal action. Due to contractual restrictions, the removal work was split between Guardian and Shaw Environmental and Infrastructure, Inc. (Shaw). Shaw was contracted to handle the remediation of the pond near the Monongahela River and the disposal of all onsite stockpiles of excavated material. Guardian was contracted to remove the coal tar contamination from within the Unnamed Tributary #1. However, prior to performing any onsite work, Shaw had to discontinue their services on site due to a conflict of interest.

Excavation of Unnamed Tributary # 1

On November 18, 2002, ERRS began excavation of contaminated sediments from Unnamed Tributary #1. Prior to excavating the sediments from the Unnamed Tributary #1, silt fences and hay bales were installed in the tributary downstream of the excavation area to minimize sediment migration. The tributary was excavated down to bedrock, approximately 2 to 5 feet deep, depending on the location. The excavated sediments were transported to a lined stockpile at the northwest area of the site. The contaminated sediments excavated up-gradient of the site fence line (southeast of site, bordering Sharon Steel Superfund Site) in Unnamed Tributary #1 were staged separately from the sediments excavated down-gradient of the fence line. The excavated area of the tributary was lined with geo-textile fabric and backfilled with imported clay material. The clay backfill was graded and rip-rap was placed at the bottom of the channel. Silt fence was installed on both sides of the tributary to minimize the migration of the silt into the restored tributary. Unnamed Tributary #1 was restored from approximately 100 feet up gradient of the current fence line (SE area of the site) to the confluence of the Unnamed Tributary #1 and the Sharon Steel Run.

During excavation of the Unnamed Tributary #1, START collected post excavation sediment samples from Unnamed Tributary # 1. The geographical coordinates of the sample locations were recorded using a Garmin GPS unit. The sediment samples were shipped to the appropriate laboratories for analysis. START also collected surface water samples from the excavation areas of Unnamed Tributary #1. A percentage of the surface water samples were analyzed using a gas chromatograph (GC) at the Wheeling START office. Background sediment and surface

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water samples were collected from Prickett Creek near Prickett's Fort State Park, Fairmont, West Virginia.

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Pond sediment excavation

A part of the removal action was to remediate the pond located at the downstream end of Unnamed Tributary #1. The pond is approximately 220 feet long by 60 feet wide at its widest location. Surface run off from the site flows into Unnamed Tributary #1 and accumulates into the pond. Surface water flows from the site in two tributaries to the Monongahela River, Unnamed Tributary #1 which flows perennially, and Unnamed Tributary #2 which is an intermittent stream. Water flowing from the Unnamed Tributary #1 accumulates in a pond where the sediments settle out and the overflow from the pond drains into the Monongahela River through a pipe buried under the road (rail to trail).

In order to remediate the pond, a dam (primary dam) was constructed up gradient of the pond. The dam prevented any new inflow of the water from Unnamed Tributary #1 to the pond. A check dam (secondary dam) was also constructed to prevent clogging of the primary dam. The water from the dam was diverted around the pond through a 24 inch PVC pipe to the Monongahela River. ERRS leveled and graded the road along the pond. A trench was excavated in sections along the road. The trench was excavated with adequate slope to facilitate gravity flow. The trench was lined with geotextile fabric, a 24" diameter pipe was placed in the trench, and the trench was backfilled. The trench excavation, lining, installation of the pipe, and backfilling the trench continued in sections. On March 20, 2003, ERRS completed installing the diversion pipe and water from Unnamed Tributary #1 stopped flowing into the pond and began to flow through the diversion pipe to the Monongahela River.

After the inflow to the pond was stopped, the pond was drained by pumping the standing water into trucks and discharging it into the City of Fairmont's sewer system. Prior to discharging the pond water into the City sewer system, a discharge permit needed to be obtained from the City of Fairmont's Sanitary Sewer Board. The permit entailed pond water sampling and analysis of pH, Total Organic Carbon (TOC), Biological Oxygen Demand (BOD), Diesel Compounds (C8 -C22), Gasoline Compounds, Phenols, Total Suspended Solids, Oil and Grease, Floatable Oil, Fats, and Grease. START collected surface water samples and provided the analytical results to Mr. Fred Roman of the Sanitary Sewer Board. The analytical results were reviewed by the City of Fairmont's Sanitary Sewer Board and a discharge permit was issued on March 20, 2003. ERRS subsequently subcontracted with R&J Waters to drain the pond. R&J Waters pumped out approximately 137,000 gallons of water from the pond into the city sewer system. Further draining of the pond was performed by ERRS.

After restricting the inflow to the pond from Unnamed Tributary #1 and completely draining the pond, water continued to accumulate in the pond from natural springs and daily precipitation. ERRS constructed a sump at the west end of the pond to accumulate the water for easy removal. ERRS continued to use the vacuum truck to pump out the pond water and discharge into the City

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Sewer System. START measured the pH of pond water before it was discharged into the manhole to ensure that the pH met the criteria in the discharge permit.

After the pond was drained completely, ERRS began excavation of the pond sediments in sections. The excavated sediments were staged in the northwest area of the site in containment cells. ERRS constructed two containment cells; containment cell no. 1 and containment cell no. 2. The dimensions of containment cell no. 1 is 60 x 108 feet and containment cell no. 2 is 72 x 108 feet. The side walls of the containment cells were constructed of timber. The floor of the cells were lined with geo-textile fabric and several gravel channels were constructed at the floor of the containment cells to help divert the infiltration water out of the containment cell. A temporary holding pit was constructed on the northeast side of containment cell no. 1 and the east side of containment cell no. 2. These holding pits served as an intermediate unloading area for the trucks bringing in the contaminated sediment from the pond. The contaminated sediments were transferred from these pits to the respective containment cell. Once each containment cell was filled to its capacity, all visible contaminated soil was removed from the pit, and the pit was backfilled with clean backfill material.

ERRS excavated and transported the pond sediments to the containment cells. As the excavation of the pond proceeded, the excavated areas were backfilled with imported clay material. This technique was utilized so that the contaminated sediments would not flow into the excavated areas and also the backfilled area would provide firm ground for the excavator to work from. The pond sediments were excavated down to bedrock. In certain areas of the pond, excavation down to bedrock was impossible due to the depth of bedrock and contaminated sediments continued to be noticed at depths exceeding 15 feet bgs. Because of the limitation posed by the length of the excavator boom it was impractical to excavate visibly contaminated sediments beyond a depth of 15 ft bgs. On June 18, 2003, ERRS completed excavation of the contaminated sediments in the pond. The pond was backfilled with imported clay material to its approximate original surface elevation. The slopes of the pond were amended to reflect the original grade and erosion control mats were spread on the slopes of the pond. START collected post excavation sediment samples from the pond. The samples were collected at a depth of approximately 15 feet bgs. The samples were packed and shipped to the designated laboratory for analysis. The temporary check dams/diversion dams constructed upstream of the pond were breached to revert the water flow through the pond and back into the Monongahela River.

ERRS installed a chainlink fence with a gate on the east side of the rail to trail path. The fence is to prevent potential trespassing of the site.

On June 28, 2003, ERRS seeded the east area of the site near the east fence line and other bare

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areas of the site to control soil erosion. ERRS began demobilizing heavy equipment from the site. On July 15, 2003, START transported all the site files from the command post to the START office in Wheeling, WV. The final demobilization of all equipment and ERRS personnel occurred on July 18, 2003.

No further removal action is anticipated under this removal response action. On August 06, 2003, START and EPA conducted video documentation of the site. Removal activities performed under this removal action were documented.

Current status of excavated contaminated soil and sediment

At present the contaminated soil and sediments from the site are staged in four stockpiles and two containment cells located in the north-northwest area of the site. The staged stockpiles are covered with plastic and hay bales are pegged on the plastic to keep the plastic in place. Hay bales are placed around the piles to prevent migration of the contaminated soil away from the piles. The four stockpiles and the sources of contaminated soil/sediment are listed below:

Stockpile No. 2

Contaminated soil that was excavated from the southeast area of the site is staged in this pile.

Stockpile No. 3

Contaminated soil that was excavated from the central, east and southeast area of the site is staged in this pile.

Stockp

ile No. 4

Contaminated sediments that were excavated from up-gradient of the fence line in the Unnamed Tributary #1 are staged in this pile.

Stockpile No. 5

Contaminated sediments that were excavated from down-gradient of the fence line in Unnamed Tributary #1 are staged in this pile.

Containment Cell No. 1 and Containment cell No. 2

The sediments excavated from the pond are staged in containment cell no. 1 and containment cell no. 2.

The contaminated soil and sediments staged on site will be disposed of appropriately. EPA's remedial division will evaluate various disposal options and dispose the contaminated soil and sediments staged on site.

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4.0 RESOURCES COMMITTED

4.1 Additional Funding Request

On September 21, 2001, an Action Memo requesting additional CERCLA funding and exemption from the 12 month and \$2 million statutory limit for removal action was approved by the Director of Hazardous Cleanup Division. Additional CERCLA funding in the amount of \$3 million was approved raising the estimated project ceiling to \$4,577,000.

During the ongoing removal action, additional area of contamination were discovered and it became evident that funds in excess of the previously authorized ceiling would be needed to continue the removal action and address the newly discovered contamination. The site conditions continued to meet the criteria for the removal action set forth in Section 300.145 of the NCP, 40 C.F.R. § 300.415 and meet the criteria for exception from statutory limit set forth in Section 104(c)(1)(A) and Section 104(c)(1)(C) of the CERCLA, 42 U.S.C. § 9604(c)(1)(A). On September 26, 2002, additional funding was approved by the Regional Administrator increasing the project ceiling to \$16,000,000.

4.2 Estimated Total Cost Summary (As of May 31, 2004)

Extramural Costs	Costs	Ceiling
Regional Allowance Costs, ERRS (Guardian)	\$ 3,571,755	\$ 3,872,908
ERRS (Guardian PB Disposal)	\$ 1,809,862	\$ 1,900,000
Regional Allowance Costs, ERRS (IT/Shaw)	\$ 47,751	\$ 78,539
START Direct	\$ 577,924	\$ 676,245
Total Extramural Costs	\$ 6,007,292	\$ 6,527,692
Intramural Costs		
EPA Direct	\$ 200,000	\$ 200,000
EPA Indirect	\$ 400,000	\$ 400,000
Total Intramural Costs	\$ 600,000	\$ 600,000
Total Extramural & Intramural Costs		\$ 6,607,292
Contingency		\$ 9,392,708

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Total Ceiling	\$ 16,000,000
PERCENT OF CEILING EXPENDED: 41%	

5.0 EFFECTIVENESS OF THE REMOVAL

5.1 Activities of the Various Agencies

5.1.1 Potentially Responsible Parties

Under an AOC, Viacom, Inc., removed glass cullet and contamination associated with the cullet. Steel Fabricators Inc., fenced the site to limit unauthorized access to the site. Removal operations at the site by the PRPs began on November 01, 2000, and ended on May 25, 2001. In August 2001, EPA reviewed and approved the Final Report for the cullet removal conducted under the AOC.

Under a UAO, Reilly began removal operation at the site on November 29, 2000. During the ongoing removal operations EPA noticed that the RAP was not completely implemented and certain work still needed to be performed as part of the RAP. Reilly was notified of the inadequacy of the cleanup. Reilly responded to EPA by indicating they were only willing to conduct a limited amount of the work required by the UAO. EPA reiterated that Reilly fully implement the RAP. Reilly notified EPA that they were unwilling to undertake the actions requested by EPA. Due to Reilly's refusal to fully implement the requirements outlined in the UAO, EPA's Removal Branch and their contractors mobilized to the site to take over the removal action.

5.1.2 Federal Agencies

Oversight of the site activities was conducted by Marjorie Easton, Jack Downie, and Dennis Matlock, EPA Region III OSCs. Site costs were tracked by Rich Messimer, EPA Region III Senior Site Administrative Officer (SSAO). RPM Christian Matta coordinated between the removal and remedial section of EPA Region III.

5.1.3 State and Local Agencies

WVDEP's Office of Environmental Remediation was represented by Tom Bass. Representation from the WVDEP field office was provided by Mr. John Hando. City of Fairmont was represented by Mr. Nick Fantasia, Mayor, and Mr. Bruce McDaniel, City Manager. Building inspection of the dilapidated building was provided by Mr. Anthony Horton, Building Inspector, City of Fairmont.

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5.1.4 Contractors

Technical support was provided by the EPA Region III START contractor, Ecology and Environment, Inc., from Wheeling, West Virginia. START was responsible for photographic and logbook documentation of site activities, providing technical assistance to the OSC, monitoring health and safety, multi-media sampling, air monitoring, GPS support, site survey and mapping, tracking of hazardous waste manifests, and cost tracking.

Removal support was provided by the ERRS contractor, Guardian, from Bear, Delaware. Guardian supplied equipment, material and personnel to conduct removal operations. Guardian was also responsible for the transportation and disposal (T&D) of materials excavated from the site, and for providing site security.

Due to contractual restrictions, the removal work was split between Guardian and Shaw. Shaw was contracted to handle the remediation of the pond near the Monongahela River and the disposal of all onsite stockpiles of excavated material. Guardian was contracted to remove the coal tar contamination from within Unnamed Tributary #1. However, prior to conducting any onsite work, Shaw had to discontinue removal support due to a conflict of interest.

5.2 Analytical Synopsis

The contaminated soil excavated by Reilly and staged onsite before EPA began the removal operation was determined by WVDEP to be a K-listed waste (K -141). The contaminated soil and sediments excavated during the current removal action are staged on site and will be disposed of appropriately. EPA's remedial division is evaluating various disposal options.

During the removal action, post excavation soil and sediment samples were collected and analyzed for Target Compound List (TCL) Organics and Target Analyte List (TAL) Metals.

Tables 5-1 through 5-8 summarize the analytical results of the soil and sediment samples. Aqueous samples were collected from the Unnamed Tributary # 1 and analyzed for TCL Organics and TAL Metals. Tables 5-9 through 5-12 summarize the analytical results of the aqueous samples. Tables 5-13 through 5-16 summarize the analytical results of waste samples collected from the site. Tables 5-17 through 5-30 summarize the analytical results of waste samples collected from the stockpiles of excavated contaminated soil staged onsite. Table 5-31 summarizes the hazardous waste characteristics of waste samples collected from the stockpiles.

Soil samples were also collected to determine lead concentration using an X-Ray Fluorescent (XRF) unit. The XRF results are summarized in Table 5-32. Approximately ten percent of the samples analyzed for lead by the XRF were analyzed using ICP through a CLP approved

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laboratory. Table 5-33 summarizes the analytical lead results of samples analyzed using ICP. Aqueous samples were collected from Unnamed Tributary # 1 and field screened for benzene, toluene, ethylene and xylene (BTEX) using a GC. A few of the samples analyzed using the GC were also analyzed by a CLP approved Laboratory. Table 5-34 summarizes the analytical results of these samples.

Results of asbestos samples collected from the building are listed in Table 5-35. Table 5-36 summarizes the results of Short Proximate analysis of the waste sample.

Water samples were collected from the pond to determine if the pond water met the discharge criteria of the City of Fairmont. The water was analyzed for Biochemical Oxygen Demand (BOD), Diesel Compounds (C8-C22), Gasoline Compounds, Phenols, Total Suspended Solids, Floatable Oil, Fats and Grease, Oils and Grease, and Total Organic Carbon. Tables 5-37 and 5-38 summarize these results.

Table 5-39 summarizes the Analytical Results of Volatile Organic Compounds Detected in Trip Blank Samples.

5.3 Disposal Methods and Quantities Removed

Approximately 194 tons of nonhazardous wastes (railroad ties, tires, conveyor belts, and metal debris) were shipped off site for disposal at the Meadowfill Landfill, Bridgeport, West Virginia. Table 3-1, summarizes the Non Hazardous Waste Shipped Off Site for Disposal.

Removal activities conducted by Reilly prior to EPA's current removal action had generated five different stockpiles. The contaminated soil was classified by WVDEP as a RCRA K-listed waste. ERRS contracted a disposal contractor to sample and dispose of the K-listed waste. Approximately 3,000 tons of K-listed waste was shipped off site for disposal. Table 3-2 summarizes the Hazardous Waste Shipped Off Site for Disposal.

6.0 CHRONOLOGY OF EVENTS

This section provides a synopsis of events as they occurred at the Big John Salvage Hoult Road Site during the removal actions conducted from September 21, 2001, to August 06, 2003. Information for this section was derived from POLREPS and site log books. The removal activities described below were preceded by removal actions performed by PRPs and three EPA-lead removals under CERCLA.

September 21, 2001

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The Director of Hazardous Sites Cleanup Division signed a request for additional funding and an exemption of the 12 month and \$2 million statutory limits for a removal action. The site had been the subject of a UAO. When the PRP refused to fully implement the RAP and address the conditions of the UAO, the EPA, under CERCLA, took action to begin the cleanup of the site. On, September 28, 2001, EPA issued a Delivery Order for Emergency Response Cleanup Services to ERRS contractor, Guardian Environmental Services, Inc.

October 02 through October 03, 2001

On October 02, 2001, START was tasked to provide technical assistance to EPA OSC Easton. START was also tasked to provide photographic and logbook documentation of site activities, develop a site health and safety plan, conduct multi-media sampling, conduct air monitoring, track hazardous waste manifests, and track EPA and START costs. On October 03, 2001, EPA, START, ERRS, and WVDEP mobilized to the site and completed a site walk. Prior to the signing of the EPA Funding Request, the PRP (Reilly Industries, Inc.) had haphazardly staged contaminated soil in stockpiles spread throughout the site. During the site walkthrough, hazardous substances were observed leaking out from the stockpiled soils.

October 15 through October 19, 2001

On October 15, 2001, START and ERRS mobilized to the site. On October 16, 2001, ERRS and their equipment arrived onsite and they began to clear brush and trees. Two trailers, one for a command post and one for equipment storage were mobilized to the site. The trailers were set up, gravel was brought in and laid out on the site roads. ERRS began to prepare the site for the removal work by consolidating railroad ties, geo-fabric, tires, and other debris which were spread over the coal tar contaminated areas throughout the site. Utilities were hooked up to the site. On October 16, 2001, RPM Matta met with START and directed START to collect samples from various areas throughout the site. START began to prepare a sampling plan to address the needs of RPM Matta. On October 17 and October 18, 2001, START worked on an analytical request to prepare for the sampling event. On October 19, 2001, the START project manager was requested to demobilize and began preparation to respond to the Capital Hill Anthrax emergency response. An additional START member mobilized to the site to continue oversight of all ERRS activities. Oversight activities included, but were not limited to, photo and logbook documentation, drafting of POLREPS, EPA and START cost tracking, manifest tracking, maintaining ERRS equipment log, multi-media sampling, and air monitoring. These activities occurred throughout the duration of the removal project and for repetitive purposes will not be included in each time frame. The site was secured at the end of the day and during non-working hours by a security guard.

October 23, 2001

On October 23, 2001, START mobilized to the site and met with OSC Easton and ERRS

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Response Manager (RM) to discuss the site plan. The west end of the site would be used to stage the contaminated soils as this would allow easy access and departure for the trucks transporting the contaminated soil from the site. In addition, staging the contaminated soil at the west end of the site would prevent backtracking on clean soil since the removal activities were planned to start at the eastern side of the site. The staged five piles of contaminated soils would be consolidated into one large pile at a proposed staging area. The OSC requested ERRS to cleanup the trash and debris spread across the site, as it covered much of the coal tar contaminated areas. START discussed the use of site maps and the possibility of sub-contracting a surveyor to create a current map. OSC agreed and requested START look into obtaining the services of a surveyor. START also notified OSC Easton that the proposed sampling event requested by RPM Matta was postponed due to an EPA emergency response. OSC requested that soil samples be collected from the proposed staging area to ensure the staging area is not contaminated.

October 24, 2001

On October 24, 2001, START performed a utility callout prior to any excavations occurring on the site. An analytical request was submitted to the EPA Client Services Team (CST) to procure a laboratory to analyze samples collected from the staging area.

October 29, 2001

On October 29, 2001, START arrived on site and collected four soil samples from the proposed staging area. A test pit was also sampled and analyzed for TAL Metals and TCL Organics. START packaged the samples and prepared them for shipment.

October 30 through November 2, 2001

On October 30, 2001, START shipped the samples to a CLP-approved laboratory. ERRS graded the area where the contaminated soil would be staged, and lined it with plastic. ERRS then began to transport the five existing stockpiles to the new staging area. Debris that was encountered throughout the site was separated and staged in its own pile. The access road to the site was widened and additional roads onsite were graded and spread with gravel. ERRS began construction on a road which began at the southeast area of the site and followed Unnamed Tributary #1 toward the pond near the Monongahela River. The staged contaminated soil was to be disposed of as K-listed waste, and the disposal of the railroad ties was discussed between Meadowfill Landfill, WVDEP, and EPA. On November 2, 2001 ERRS demobilized from the site for a short break.

November 6 through November 10, 2001

On November 6, 2001, ERRS resumed site work. Transport of the stockpiles of contaminated soil to the new staging area continued. While transporting the contaminated soil, pockets of coal

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tar were discovered from areas surrounding the stockpiles staged by the PRP. The contaminated coal tar material was consolidated with the existing stockpiles and transported to the staging area.

Additional coal tar was discovered migrating from under the round concrete tank pads located at the center of the site. Silt fence was installed around this tar seep area. Clearing and grubbing of the site continued. Brush, tires and other debris from throughout the site continued to be separated and staged in its own pile. START's job trailer, from the previous PRP oversight was still onsite. The contents of the job trailer was transferred to the EPA command post and the old job trailer was prepared for demobilization. On November 7, 2001, the PRP's contractor, Doug Taylor of Environmental Strategies Corporation, arrived onsite and inspected the treatment system of the East and Middle Tributaries. On November 8, 2001, during a site walk by START and EPA, an item thought to be a capacitor was discovered. START was tasked by EPA to check if any polychlorinated biphenyls (PCBs) were in the capacitor. After further analysis of the item it was determined to be only a piece of scrap metal. On November 9, 2001, the electric company arrived onsite and disconnected the power to the old command post.

November 12 through November 17, 2001

On November 12, 2001, ERRS resumed consolidating the contaminated soil into one stockpile located at the northwest area of the site. ERRS also continued to clear and grub the site. Scrap metal, concrete pieces, tires, railroad ties, and brush continued to be segregated and staged in their respective piles. Three drums, of which the contents were unknown, were found half buried near the PRP's treatment trailer. These drums were wrapped with visqueen and staged adjacent to the abandoned building onsite. Heavy equipment, to be used for excavating and transporting soils, continued to be mobilized to the site. By November 13, 2001, the five stockpiles of contaminated soil left by the PRP's contractors, had been fully consolidated into one large stockpile located northwest of the command post. ERRS then began to excavate the soils surrounding the concrete tank pads located at the center of the site. Tar was visible in this area. The tar was temporarily covered with a thin layer of dirt to hold it in place and to stabilize it. A silt fence was installed surrounding the excavation area. Excavation was halted until all debris was removed from this area and until the nearby slope could be stabilized. On November 15, 2001, ERRS installed metal screens on the two 12-inch drainage pipes in the pond located near the Monongahela River. This was to prevent the pipes from becoming clogged. The PRP's contractor arrived onsite and inspected the treatment system of the East and Middle Tributaries. START was requested by OSC to accompany the PRP contractor in order to maintain the onsite buddy system. On November 16, 2001, a news reporter from the Times West Virginia arrived onsite and interviewed OSC Jack Downie. An article about the site appeared in the newspaper the following day.

November 19 through November 21, 2001

On November 19, 2001, ERRS continued to clear and grub the site. Scrap metal, concrete

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pieces, tires, railroad ties, and brush continued to be segregated and staged in their respective piles. The debris had been fully removed from the area surrounding the concrete tank pads, and the nearby slope had been stabilized. On November 19, 2001, a news reporter from the local TV station, Channel 5, arrived onsite and interviewed OSC Jack Downie. On November 21, 2001, ERRS demobilized for the holiday weekend.

November 26 through December 1, 2001

ERRS mobilized back to the site on November 26, 2001. The following day ERRS resumed clearing and grubbing of the site. ERRS began chipping the staged trees and brush garnered during the clearing and grubbing activities. Debris from throughout the site continued to be segregated and staged in their respective piles. While excavating a trench for a water line to be installed to the decon station, a dismantled buried pipe was discovered. Coal tar was observed seeping from the surrounding area. The pipe was removed and placed in the debris pile. Additional gravel was brought in and spread over site roads. The PRP's contractor arrived onsite and inspected the treatment system of the East and Middle Tributaries. The electrical system of the treatment trailer was repaired on November 28, 2001 by Webnic, a local electric repair company. On November 28, 2001, ERRS conducted a pre-bid meeting for the disposal of the contaminated soil from the PRP's previous work. Six contractors/bidders attended the meeting. Each contractor was provided a bid package and was briefed about the contaminants in the soil. The contractors were to submit a bid for the disposal of the contaminated soil. On November 28, 2001, Representatives from Kipin Industries Inc. (Kipin) arrived on site. Kipin briefed the OSC on the treatment technology for the treatment of the contaminated soil on site. The OSC began to evaluate the feasibility and applicability of Kipin's technology for this site. A water line was installed to the site by ERRS and their sub-contractor, Anchor, on November 30, 2001. A decon station for heavy equipment began to be set up across command post. RPM Matta requested START to procure a lab for groundwater sampling. START began to coordinate the sampling event.

December 3 through December 8, 2001

On December 3, 2001, ERRS resumed site work. Clearing and grubbing of the area around Unnamed Tributary # 1 continued. The staged trees and brush garnered during the clearing and grubbing activities continued to be chipped and staged onsite for future use. Site roads continued to be graded. Debris from throughout the site continued to be segregated and staged in their respective piles. ERRS continued installation of the decon pad. Gravel was laid down and the decon pad was widened to facilitate the heavy equipment. On December 4, 2001, RPM Matta and START discussed the collection of groundwater samples from a well located near the Alcan Plant. The majority of START personnel were working on the Capitol Hill response and there was a shortage of personnel. START was tasked to prepare a sampling plan and procure a laboratory. A pit was discovered at the southeast side of the site near the fence line. The pit

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had a small pipe extending into it. Some drums were discovered in the pit. ERRS removed the drums from the pit, graded the surrounding soils into the pit, and placed haybales around the perimeter to divert surface runoff from the entering the pit. On December 5, 2001, ERRS began construction of the road to Unnamed Tributary # 1. The road was planned to follow the tributary to the pond near the Monongahela River and will enable heavy equipment to access and excavate the contamination from the tributary. ERRS stockpiled the excavated soil from the construction of the road for future onsite use. On December 6, 2001, WVDEP Bass arrived onsite and discussed ground water sampling with START. WVDEP Bass stated that no groundwater sampling could be conducted due to the poor construction of the well. START cancelled the sampling event and notified the proper personnel. On December 6, 2001, the PRP's contractor arrived onsite and inspected the treatment system of the East and Middle Tributaries. START noticed that the used filters from the treatment trailer had been placed on the ground and oil was dripping from them. START recommended that the used filters be placed in a drum to prevent oil from dripping on the ground. The PRP's contractor proceeded to bag some of the filters.

December 10, through December 15, 2001

ERRS resumed site work on December 10, 2001. Clearing and grubbing of the area around Unnamed Tributary # 1 continued. The staged trees and brush garnered during the clearing and grubbing activities continued to be chipped. The access road following Unnamed Tributary #1 continued to be excavated. At areas where the access road crossed over the tributary, pipes were installed to divert the water under the road. The excavated soil from the access road continued to be stockpiled onsite. On December 11, 2001, the OSC and Anthony Horton, building inspector, City of Fairmont, met onsite and discussed the abandoned building onsite. START performed a deed search to locate the building owner's current mailing address. On December 12, 2001, the City of Fairmont inspected the building and determined that it must be condemned.

The City of Fairmont issued a notice to the property owner, Mr. Morgan, that the building must be condemned. Mr. Morgan was given sixty days to respond to the notice. If there was no response within the allotted time, the building could be demolished. ERRS excavated the pit which had been discovered at the southeast area of the site, and staged the material into a stockpile. Tree stumps garnered from clearing and grubbing were temporarily staged in the excavated pit. Two samples from the excavated soil from the pit were collected by ERRS on December 12, 2001, and shipped to a lab for disposal analysis. On December 14, 2001, the PRP's contractor, Mr. Taylor, arrived onsite and inspected the treatment system of the East and Middle Tributaries. Mr. Taylor also collected water samples from the treatment system.

December 17 through December 20, 2001

On December 17, 2001, ERRS resumed site activities. ERRS continued to clear and grub the

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area around Unnamed Tributary # 1, stage trees and brush garnered during the clearing and grubbing activities, and continued to excavate the access road adjacent to Unnamed Tributary #1. ERRS installed silt fences and haybales alongside the road to prevent soil erosion into Unnamed Tributary # 1. ERRS continued to stockpile the excavated soil from the access road construction. Debris from throughout the site continued to be segregated and staged in their respective piles. On December 20, 2001, ERRS demobilized from the site and all site work was halted for the Christmas holidays.

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January 7 through January 12, 2002

EPA, START, and ERRS mobilized to the site on January 7, 2002 and resumed site activities the following day. Snow was cleared from all site roads. ERRS continued to clear and grub the area around Unnamed Tributary # 1, stage trees and brush garnered during the clearing and grubbing activities, and continued to excavate the access road adjacent to Unnamed Tributary #1.

START procured a lab for the soil analysis from the excavated pit onsite. The sampling was scheduled for January 14, 2002. On January 10, 2002, the PRP's contractor, Mr. Taylor, arrived onsite and inspected the treatment system of the East and Middle Tributaries. The PRP, Reilly Industries Inc., issued a complaint to EPA that ERRS was using heavy equipment near the manhole in the collection system of the East Tributary. OSC and START accompanied Mr. Taylor to the area and showed him that ERRS was not using heavy equipment in this area. Mr. Taylor agreed to write a memo correcting the complaint.

January 14 through January 19, 2002

ERRS resumed site activities on January 14, 2002. ERRS continued to clear and grub the area around Unnamed Tributary # 1, stage trees and brush garnered during the clearing and grubbing activities, and continued to excavate the access road adjacent to Unnamed Tributary #1. ERRS continued to segregate and stage debris from throughout the site. WVDEP Bass arrived onsite on January 15, 2002 and performed a site walk through. Mr. Bass was given a copy of the complaint letter from Reilly Industries, Inc., which indicated that heavy equipment was being used on the collection systems. The OSC drafted a rebuttal to the PRP's complaint. On January 17, 2002, two additional START members arrived onsite to assist in the collection of samples. Three soil samples were collected from the stockpiled soil which originated from the pit at the southeast side of the site. The samples were packaged and shipped to the CLP-approved labs. On January 17, 2002, the PRP's contractor, Mr. Taylor, arrived onsite and inspected the treatment system of the East and Middle Tributaries. On January 18, 2002, ERRS notified START that a small area of coal tar contaminated soil was discovered in the ravine of the West Tributary. ERRS subsequently excavated and staged the contaminated soil into a separate pile in the northeast area of the site. ERRS began to break the concrete tank pads located at the center of the site. The concrete pads were contaminated with oil and other organic matter. On January 19, 2002, the pile of contaminated soil from the ravine was moved to the northwest area of the site.

January 21 through January 24, 2002

On January 21, 2002, ERRS resumed site work. ERRS continued to break the concrete tank pads into small manageable pieces, excavate the contaminated soil discovered in the ravine, segregate and stage debris, chip brush and trees, and maintained site roads. A 1,000 gallon fuel tank was brought onsite to replace the 500 gallon tank used by ERRS. The stockpiled soil from the excavation of the access road to Unnamed Tributary #1 was used to construct a road in the

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West Tributary. On January 23, 2002, START procured a lab for soil samples to be analyzed for Total Metals, organics, and British Thermal Units (BTUs). On January 24, 2002, the PRP's contractor, Mr. Taylor, arrived onsite and inspected the treatment system of the East and Middle Tributaries.

January 28, 2002 through February 02, 2002

On January 28, 2002, ERRS, START, and EPA mobilized to the site and site work resumed the following day. ERRS continued constructing the road to the pond area near the Monongahela River, continued clearing trees and shrubs, continued to chip the trees, and continued to break up concrete pads into smaller pieces. Silt fence and haybales were also installed along the access road to prevent soils from migrating into the tributaries. Track dump-trucks carried soil excavated during the road construction up to a central stockpile area. ERRS also constructed a small bridge, which was made of railroad ties and filled in with dirt, over a high pressure gas line that ran across the road to the pond. On January 30, 2002, EPA, WVDEP, Exxon Mobil, ERRS, and START conducted a meeting onsite. Issues discussed were site access, notification to Exxon Mobil if coal tar contamination is discovered on their property, and coordination of the health and safety plans. On January 31, 2002, Mr. Taylor arrived onsite and collected a water sample from the treatment system and changed the filter bags. ERRS awarded a disposal contract to Capital Environmental Services, Inc., to transport and dispose of the soil stockpiled by the PRP's previous removal work. Capital Environmental Services, Inc., planned to separate the stockpile into smaller piles (100 cubic yards) and then sample the piles for disposal analysis. On February 2, 2002, OSC requested START to procure the services of a surveyor to survey and map the site.

February 04 through February 09, 2002

ERRS continued constructing the road along Unnamed Tributary # 1. Track dumptrucks carried soil excavated during the road construction up to a central stockpile area. To prevent soil erosion and deposition of the sediments into Unnamed Tributary # 1, silt fence and hay bales were installed along the road facing Unnamed Tributary # 1. ERRS continued to clear trees and shrubs, chip trees, break concrete pads into smaller pieces, and powerwash the contaminated concrete pieces. During excavation by ERRS in the northwest area of the site, a large underground rectangular structure was discovered. The structure was approximately 30 feet long, 20 feet wide, and 4 feet deep. Glass cullet and perched water filled the structure. Coal tar was observed in the surrounding soils. A metal pipe of approximately eighteen inch diameter drained the contents of the structure to the ravine area (West Tributary). The structure appeared to be used as a wash basin for the former glass cullet operations. The steel walls and the pipes extending from the wash basin were excavated. The location of the wash basin was recorded using a GPS unit. The contents were left in the ground for future removal. START collected soil samples from the stockpiles of overburden. The disposal contractors collected samples

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from the coal tar contaminated stockpiles. The OSC requested START to perform a radiation survey of the northwest area of the site. The radiation action levels set forth in the health and safety plan were not exceeded.

February 11 through February 15, 2002

ERRS continued constructing the road along Unnamed Tributary # 1. Track dumptrucks carried soil excavated during the road construction up to a central stockpile area. To prevent soil erosion and deposition of the sediments into Unnamed Tributary # 1, silt fence and hay bales continued to be installed along the road facing Unnamed Tributary # 1. ERRS continued clearing trees and shrubs, chipping trees, and breaking concrete pads into smaller pieces. The contaminated pieces continued to be power washed to remove coal tar. ERRS continued to maintain existing site roads. On February 11, 2002, Richard Allyn from TV channel 12, WBOY, arrived onsite to interview and film OSC Easton regarding onsite progress and future activities. START collected three water samples from onsite tributaries, one glass cullet sample from the wash basin, and one hardened coal tar sample from the wash basin. On February 14, 2002, Mr. Taylor arrived onsite and inspected the treatment system and replaced the bag filters. Mr. Taylor also agreed to mark the underground water and electric lines coming from the collection system to the treatment trailer. ERRS demobilized from the site on February 15, 2002.

February 18 through February 23, 2002

On February 18, 2002, EPA, START, and ERRS mobilized to the site. Site activities resumed on February 19, 2002. ERRS continued constructing the access road along Unnamed Tributary # 1. Track dumptrucks carried soil excavated during the road construction up to a central stockpile area. ERRS continued clearing trees and shrubs, continued to chip the trees, continued to maintain site roads, and continued to break up concrete pads into smaller pieces using a jack hammer which was attached to a piece of heavy equipment. The contaminated concrete pieces were power washed to remove coal tar. On February 19, 2002, START obtained a copy of the tax map and information on the property rights of parcels indicated on the tax map. On February 20, 2002, Mr. Taylor and his sub-contractors, arrived onsite and changed out the carbon in the filters and disposed of used carbon and water which were stored in drums. The drummed carbon and water were from previous carbon filter change outs. A sifter was mobilized to the site by ERRS to be used to sift debris from the overburden. On February 21, 2002, Mr. Lavine from Meadowfill Landfill, contacted OSC Easton and agreed to accept tires, railroad ties, and metal debris. On February 22, 2002, Mr. Taylor arrived onsite to inspect the treatment system.

February 25 through March 02, 2002

ERRS continued constructing the road along the Unnamed Tributary # 1. Track dumptrucks carried soil excavated during the road construction up to a central stockpile area. ERRS

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continued clearing trees and shrubs, continued to chip the trees, continued to maintain site roads and silt fences, and continued to break up concrete pads into smaller pieces using a jack hammer attached to a piece of heavy equipment. The contaminated concrete pieces were power washed to remove coal tar. Sifting of debris from the overburden continued. Large pieces of debris, which consisted of tires, railroad ties, pipes, and scrap metal was scattered throughout the site. Coal tar contamination was often found to be underneath the debris. ERRS segregated the debris into piles of similar materials. Several survey contractors arrived to take tours of the site.

On February 27, 2002, rolloff boxes loaded with tree stumps were transported offsite to Meadowfill Landfill by SOS Salvage Company. On February 28, 2002, WVDEP Hando, arrived onsite and collected wood chip samples from the railroad ties for disposal purposes. Mr. Hando also collected water samples from Unnamed Tributary #1 to be analyzed for coliform content. Mr. Taylor and Mr. George Pigott arrived onsite to mark the location of the underground electrical and water lines to the treatment trailer. Mr. Taylor collected water samples from the treatment system. Additional rolloff boxes loaded with tires and scrap metal were transported to Meadowfill Landfill in Bridgeport, WV.

March 04 through March 08, 2002

ERRS continued to maintain site roads and silt fences, and continued to break up concrete pads into smaller pieces. The contaminated concrete pieces were power washed to remove coal tar. After the concrete pieces were washed the concrete pieces were separated into a "clean" pile and a "dirty" pile. Re-bar, that was sticking out of the concrete pieces, was cut off. Sifting of debris from the overburden continued. Rolloff boxes of tires continued to be transported to Meadowfill Landfill in Bridgeport, WV. On March 04, 2002, START telephoned Art Chin of Exxon Mobil, and discussed using topographical information from an existing map created by Exxon Mobil. Mr. Chin scheduled a site visit for March 07, 2002 to further discuss the use of the pre-existing topographic map. On March 05, 2002, the OSC stated that the contaminated soil stockpiles which had been sampled by the disposal contractors had failed all treatability studies. The contaminated soil would have to be incinerated. The PRP's subcontractor, Pigott and Associates, arrived to finish marking the underground electric and water lines to the treatment trailer. During this site visit, the subcontractors had failed to mark the location of the underground water line coming from the treatment system to the sewer manhole. START left a voicemail with Mr. Taylor asking him to return to the site and mark the underground water lines.

On March 05, 2002, a truck arrived onsite to transport a load of the contaminated soil to Ross Incineration Services in Grafton, Ohio, to be used a test run for the facility. While removing the concrete tank pads located at the eastern side of the site, START observed coal tar contamination under the pads. On March 07, 2002, Art Chin of Exxon Mobil, and Frank Markert of IT Corporation, arrived onsite to discuss the use of topographical data. START asked permission to use Exxon Mobil's topographical data of the site so that the surveyors would not be surveying areas that have already been surveyed. Art Chin of Exxon Mobil gave START permission to

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use the topographical data. The data had been collected from a flyover performed by Harry Burger in 1998 or 1999. Frank Markert agreed to send START the data on a CD. Mr. Taylor arrived onsite to inspect the treatment system. ERRS demobilized from the site on March 09, 2002.

March 12 through March 16, 2002

ERRS continued to maintain site roads and silt fences, and continued to break up concrete pads into smaller pieces. The contaminated concrete pieces were power washed to remove coal tar and then separated into a "clean" pile and a "dirty" pile. Re-bar, that was sticking out of the concrete pieces, was cut off. Sifting of debris from the overburden continued. Rolloff boxes of tires continued to be transported to Meadowfill Landfill in Bridgeport, WV. Validated analytical data from the sifted soil stockpile was received. The data showed elevated levels of lead. A decision was made by the OSC to stage the sifted soil in a separate pile. Two truckloads of contaminated soil were transported offsite to Ross Incineration Services in Grafton, Ohio. Concrete tank cradles were removed and coal tar contamination was discovered in the surrounding soils. The contaminated soils were excavated and stockpiled and the concrete tank cradles were dismantled and power washed.

March 18 through March 23, 2002

ERRS continued to maintain site roads and silt fences, and continued to break up concrete pads into smaller pieces. The contaminated concrete pieces continued to be power washed in order to remove coal tar and then were separated into a "clean" pile and a "dirty" pile. Re-bar, that was sticking out of the concrete pieces, was cut off. Sifting of debris from the overburden continued.

A rolloff box of tires was transported to Meadowfill Landfill in Bridgeport, WV. Four truck loads of contaminated soil were transported offsite to Ross Incineration Services in Grafton, Ohio. ERRS began excavation of coal tar contaminated soil in the area southwest of the abandoned building. The area was excavated to a depth of approximately 2.5 to 3 feet and the soils were stockpiled. The stockpile was lined and covered with plastic. Haybales and silt fences were installed around the perimeter of the stockpile to prevent migration of the contaminated soils. On March 21, 2002, Mr. Taylor arrived onsite and inspected the treatment system. After the area southwest of the building was excavated, ERRS backfilled the area with soil garnered during the construction of the road to the pond.

March 25 through March 29, 2002

ERRS continued to maintain site roads and silt fences, and continued to break up concrete pads into smaller pieces. The contaminated concrete pieces continued to be power washed and separated into a "clean" pile and a "dirty" pile. Re-bar, that was sticking out of the concrete pieces, was cut off. Sifting of debris from the overburden continued. ERRS continued to excavate contaminated soil south of the abandoned building. The contaminated soils continued

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to be stockpiled. Large debris (concrete, railroad ties, and scrap metal) was separated out of the contaminated soil and power washed. The OSC telephoned WVDEP Hando on the status of a water and railroad tie sample. Mr. Hando informed the OSC that the analytical results had been received, and that the water sample which had been analyzed for coliform, indicated an absence of choliform, and the railroad ties staged onsite could be disposed of as non-hazardous. Three loads of contaminated soil were transported offsite to Ross Incineration Services in Grafton, Ohio. After the area across the abandoned building was excavated, ERRS backfilled the area

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with soil garnered during the construction of the road to the pond. On March 28, 2002, Mr. Taylor arrived onsite and inspected the treatment system and the manholes of the East and Middle Tributary. On March 29, 2002, ERRS demobilized from the site.

April 02 through April 06, 2002

ERRS continued to maintain site roads and silt fences. The contaminated concrete pieces continued to be power washed in order to remove coal tar and then were separated into a "clean" pile and a "dirty" pile. Re-bar, that was sticking out of the concrete pieces, was cut off. Sifting of debris from the overburden continued. Dust suppression was implemented by spraying water on the onsite roads. ERRS also continued excavating contaminated soil near the abandoned building. Contaminated soil was excavated in certain areas near the building up to a depth of 10 to 12 feet below ground surface (bgs). The contaminated soils continued to be stockpiled. Large debris (concrete, railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. After areas near the abandoned building were excavated, ERRS backfilled the area with soil garnered during the construction of the road to the pond. START received a copy of the analytical data from the samples collected by WVDEP Hando. Mr. Hando also provided a copy of the data to Meadowfill Landfill. On April 02, 2002, Potesta and Associates, who had been awarded the survey subcontract from START, arrived onsite to perform a site walk through with START. START showed Potesta and Associates the areas to be surveyed and they began to survey the site. Surveying continued through the first half of the week. On April 03, 2002, Mr. Horton from the City of Fairmont, arrived onsite to discuss issues of the abandoned building. Mr. Horton indicated he would send a notice to the property owner, Mr. Morgan, to demolish the building. WVDEP Bass and Ellison arrived onsite and performed a site walk through with OSC Easton. On April 04, 2002, Mr. Taylor arrived onsite and inspected the treatment system and the manholes of the East and Middle Tributary. On April 05, 2002, three representatives from Steel Fabricators Inc., (the property owners company) arrived onsite and examined the building. Mr. Morgan, the property owner, signed the consent to demolish the building and indicated he would contact OSC Easton on April 08, 2002, to discuss the removal of personal items within the building.

April 08 through April 13, 2002

ERRS continued to maintain site roads and silt fences. The contaminated concrete pieces continued to be power washed in order to remove coal tar and were then separated into a "clean" pile and a "dirty" pile. Re-bar, that was sticking out of the concrete pieces, was cut off. Dust suppression was implemented on the site roads by spraying water. ERRS continued excavating contaminated soil near the abandoned building. Large debris (concrete, railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. The visibly non-contaminated soil (overburden) was excavated to get to the visibly contaminated soil. This overburden was kept separate from the contaminated soil and was sifted to remove the small

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debris. A large concrete foundation with side walls and floor was unearthed approximately 60 feet south of the abandoned building. Heavy coal tar contamination and debris was present under the concrete floor and in the surrounding soils of the side wall. The concrete was removed from the ground and power washed to remove the coal tar contamination. ERRS excavated a test pit to a depth of 10 feet in this area. The test pit indicated that contamination was present at various layers and was also present at the bottom of the test pit. A strong odor of tar was also present. START photographed the test pit and marked the location with a GPS unit before the pit was backfilled. The contaminated soils continued to be transported to the stockpile. After areas near the abandoned building were excavated, ERRS backfilled the area with soil garnered during the construction of the road to the pond. START marked the edge of the PRP's collection system to prevent ERRS from accidentally excavating soils from the collection system. On April 9, 2002, ERRS collected three samples from inside the abandoned building for asbestos analysis. START procured an approved lab and shipped the asbestos samples. START also collected three soil samples from the sifted soil stockpiles to be analyzed for TAL Metals and TCL Organics. Four water samples and two sediment samples from the pond near the Monongahela River were collected by START to be analyzed for TAL Metals and TCL Organics. A pH reading from the pond was also collected. START shipped the soil, water, and sediment samples on April 10, 2002. Potesta and Associates resumed their surveying work. On April 10, 2002, a second incinerator, Onyx Incineration Services in Port Arthur, Texas, was approved to handle the coal tar contaminated soil. Approximately 15 trucks per week were scheduled to be transported to Onyx Incineration Services starting on April 15, 2002. During the week of April 08, 2002, three truck loads of contaminated soil were transported offsite to Ross Incineration Services in Grafton, Ohio. Additional rolloff boxes were brought to the site to dispose of non-hazardous debris. Loaded rolloff boxes were transported offsite to Meadowfill Landfill. On April 11, 2002, Mr. Taylor arrived onsite and inspected and collected a water sample from the water treatment system. On April 12, 2002, START received, via fax, the analytical results from the asbestos lab. All of the samples from the abandoned building indicated a presence of asbestos. ERRS began to remove unwanted items from the abandoned building in preparation for demolition.

April 15 through April 18, 2002

ERRS continued to maintain site roads and silt fences. The contaminated concrete pieces continued to be power washed and separated into a "clean" pile and a "dirty" pile. Re-bar, that was sticking out of the concrete pieces, was cut off. Dust suppression was implemented on the site roads by spraying water. ERRS continued excavating contaminated soil near the abandoned building and transported it to a lined stockpile. Large debris (concrete, railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. Test pits were dug to a depth of approximately 12 feet and contamination was still present at that depth. The contamination was under thick layers of clay. The visibly non-contaminated soil was excavated

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to get to the visibly contaminated soil. This overburden was kept separate from the visibly contaminated soil and was sifted to remove the small debris. Sixteen truckloads of contaminated soil were transported offsite to Onyx Environmental Services in Port Arthur, Texas. START collected two soil samples from test pits and one sediment sample from a seep in the collection system of the East Tributary. START packaged and shipped the samples on April 16, 2002. Rolloff boxes loaded with non-hazardous debris also continued to be transported to Meadowfill Landfill in Bridgeport, WV. On April 18, 2002, the asbestos sub-contractors of ERRS, arrived onsite and toured the site prior to submitting a bid. Mr. Morgan, the property owner, also arrived onsite and met with OSC Easton. Mr. Morgan stated that he would remove items of interest to him from the abandoned building and the remaining items could be disposed of by EPA. On April 18, 2002, START collected one soil sample from a test pit and one soil sample from the current excavation area. On April 19, 2002, ERRS demobilized from the site.

April 22 through April 27, 2002

ERRS mobilized to the site on April 22, 2002, and resumed site work the following day. ERRS continued to maintain site roads and silt fences. The contaminated concrete pieces continued to be power washed and separated into a "clean" and "dirty" pile. Re-bar, that was sticking out of the concrete pieces, was cut off. Dust suppression was implemented by spraying water on the site roads. ERRS continued excavating contaminated soil near the abandoned building. The contaminated soil continued to be transported to a lined stockpile. Large debris (concrete, railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. Test pits were excavated up to a depth of 10 feet and contamination was present at that depth. ERRS began to demolish the large concrete wall down-gradient of the concrete tank pads located on the eastern side of the site. ERRS removed debris from within the abandoned building. During the week of April 22, 2002, 12 truckloads of contaminated soil were transported offsite to Onyx Environmental Services in Port Arthur, Texas. On April 24, 2002, WVDEP Bass and RPM Matta arrived onsite and performed a site walk through. On April 25, 2002, Mr. Taylor and Mr. Haddock of ESC, arrived onsite and inspected the PRP's treatment system.

April 29 through May 04, 2002

ERRS continued to maintain site roads, maintain silt fences, and continued to power wash the contaminated concrete pieces. The power washed concrete pieces were separated into a "clean" and "dirty" pile. Re-bar, that was sticking out of the concrete pieces, was cut off. Large debris (concrete, railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. Dust suppression was implemented on the site roads by spraying water. ERRS continued to excavate contaminated soil near the abandoned building and transported it to a lined stockpile located in the northwest area of the site. ERRS continued to remove debris from

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within the abandoned building. ERRS unclogged the drainage pipes within the pond near the Monongahela River, and installed a drainage pipe near the ravine of the West Tributary. On April 29, 2002, START noticed that the alarm light for the PRP's treatment system was flashing.

START subsequently notified the PRP's contractor, Mr. Taylor, of the problem. Mr. Taylor mobilized to the site, found a leak in the treatment system and preceded to fix the leak. On April 30, 2002, ERRS began separating the large stockpile of contaminated soil that had been consolidated from the PRP's stockpiles into 100 cubic yard piles. Capitol Environmental Services Inc., sampled each 100 cubic yard pile for disposal purposes. On May 01, 2002, Mr. Haddock of ESC, arrived onsite to inspect the PRP's treatment system. On May 02, 2002, Mr. Taylor of ESC, arrived onsite and examined the treatment system. On May 04, 2002, Mr. Morgan arrived onsite and removed his personal items from the abandoned building. The remaining items within the building were to be disposed of appropriately.

May 06 through May 10, 2002

ERRS continued to maintain site roads, maintain silt fences, and continued to power wash the contaminated concrete pieces. The power washed concrete pieces were separated into a "clean" and "dirty" pile. Re-bar, that was sticking out of the concrete pieces, was cut off. Large debris (concrete, railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. Dust suppression was implemented on the site roads by spraying water. ERRS continued excavating contaminated soil from the southeast area of the site near the concrete wall.

Parts of the concrete wall were demolished to access the contaminated soil. The non-contaminated soil (overburden) was excavated to get to the visibly contaminated soil. This overburden was kept separate from the visibly contaminated soil and was sifted to remove the small debris. The contaminated soil continued to be transported to a lined stockpile. The excavated areas were then graded to promote site drainage. ERRS placed a large slab of cleaned concrete on the bank of in Unnamed Tributary #1 to help prevent soil erosion. On May 07, 2002, a septic tank was unearthed at the southeast area of the site. A septic truck was mobilized to the site and the contents of the septic tank was pumped out and transported offsite. While pumping the contents from the septic tank a bottom layer of liquid tar was discovered. The tar was removed from the septic tank and placed on the coal tar contaminated stockpile. Once the septic tank had been emptied it was dismantled. Rolloff boxes loaded with non-hazardous debris continued to be transported to Meadowfill Landfill in Bridgeport, WV. On May 09, 2002, WVDEP Bass, RPM Matta, EPA Ludzia, and EPA Shaul arrived onsite and performed a site walkthrough. Mr. Taylor also arrived onsite and inspected the PRP's treatment system. ERRS demobilized from the site on May 10, 2002. START marked onsite locations with a Trimble (GPS Unit) in order to tie in the surveyor's map and START's GPS unit.

May 13 through May 18, 2002

On May 13, 2002, ERRS mobilized to the site and resumed site work on May 14, 2002. ERRS

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continued to maintain site roads, maintain silt fences, and continued to power wash the contaminated concrete pieces in order to remove coal tar. The power washed concrete pieces were then separated into a "clean" and "dirty" pile. Re-bar, that was sticking out of the concrete pieces, was cut off. Large debris (concrete, railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. Dust suppression was implemented on the site roads by spraying water. ERRS continued excavating contaminated soil from the southeast area of the site. The non-contaminated soil (overburden) was excavated to get to the visibly contaminated soil. This overburden was kept separate from the visibly contaminated soil and was sifted to remove the small debris. The contaminated soil excavated onsite continued to be staged in a lined stockpile. Test pits were dug after the visibly contaminated soil had been removed in order to determine if further contamination was present at depth. The excavated areas were then graded to promote site drainage. The depression where a small pond was previously located at the eastern side of the site by the fence line was backfilled. Potesta & Associates arrived onsite on May 14, 2002 and surveyed the property lines which were needed to prepare the final map. During the week of May 14, 2002, three truckloads of contaminated soil were transported to Ross Incineration Services in Grafton, Ohio, and 13 truckloads of contaminated soil were transported to Onyx Environmental Services in Port Arthur, Texas. On May 15, 2002, Mr. Taylor arrived onsite and inspected the PRP's treatment system. START collected three soil samples from the site on May 16, 2002. OSC requested START to procure an XRF machine to sample the site for lead due to several previous sample results showing elevated levels of lead. ERRS began preparing an area to stage the next stockpile of contaminated soil. On May 17, 2002, AMI, ERRS asbestos sub-contractor, arrived onsite and inspected the abandoned building. The building was scheduled to be demolished and the asbestos to be removed prior to demolition.

May 20 through May 25, 2002

ERRS continued to maintain site roads, maintain silt fences, and continued to power wash the contaminated concrete pieces. The power washed concrete pieces were then separated into a "clean" and "dirty" pile. Large debris (concrete, railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. Dust suppression was implemented on the site roads by spraying water. ERRS continued excavating contaminated soil from the southeast area of the site. The non-contaminated soil (overburden) was excavated to get to the visibly contaminated soil. This overburden was kept separate from the visibly contaminated soil and was sifted to remove the small debris. The contaminated soil excavated onsite continued to be staged in a lined stockpile. Test pits were dug after the visibly contaminated soil had been removed in order to determine if further contamination was present at depth. The excavated areas were then graded to promote site drainage. ERRS continued to prepare an area to stage the next stockpile of contaminated soil. During the week of May 20, 2002, EPA conducted a site audit. Eight truckloads of contaminated soil were transported to Onyx Environmental Services

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in Port Arthur, Texas, and three loads were transported to Ross Incineration Services in Grafton, Ohio during the week of May 20, 2002. On May 22, 2002, START began a lead analysis survey on soil samples from throughout the site using the XRF unit. The non-contaminated concrete pile which was located near the abandoned building was moved to the southeast area of the site which had been previously cleaned. The concrete pile was removed because there was coal tar contamination under the pile. Other items which have also been staged near the building were

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relocated. On May 23, 2002, Mr. Taylor arrived onsite and inspected the PRP's treatment system.

May 28 through May 31, 2002

ERRS continued to maintain site roads, maintain silt fences, and continued to power wash the contaminated concrete pieces. The power washed concrete pieces continued to be separated into a "clean" and "dirty" pile. Large debris (concrete, railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. Dust suppression was implemented on the site roads by spraying water. ERRS continued excavating contaminated soil from the southeast area of the site. The overburden was excavated to get to the visibly contaminated soil.

This overburden was kept separate from the visibly contaminated soil and was sifted to remove the small debris. The sifted soil from the overburden was stockpiled onsite for future use. The contaminated soil excavated onsite continued to be staged in a lined stockpile. Test pits were dug after the visibly contaminated soil had been removed in order to determine if further contamination was present at depth. The excavated areas were then graded to promote site drainage. ERRS continued to prepare an area to stage the next stockpile of contaminated soil. START continued to perform lead analysis on soil samples from throughout the site using the XRF unit. Three truckloads of contaminated soil were transported to Ross Incineration Services in Grafton, Ohio during the week of May 28, 2002. ERRS continued to relocate the power-washed concrete pieces to the southeast side of the site. On May 30, 2002, Mr. Taylor arrived onsite and inspected the PRP's treatment system. On May 30, 2002, START completed the lead analysis survey using the XRF unit and the unit was returned. On May 31, 2002, ERRS demobilized from the site.

June 03 through June 08, 2002

On June 03, 2002, ERRS mobilized to the site and resumed site work the following day. Plastic liners covering the stockpiles were re-established due to stormy weather over the weekend. Haybales which were lined up across the road near the pond had been removed over the weekend and ATV tracks were present. ERRS subsequently placed a large concrete barrier across the road to prevent unauthorized site access. ERRS continued to maintain site roads, maintain silt fences, and continued to power wash the contaminated concrete pieces. The power-washed concrete pieces were then separated into a "clean" and "dirty" pile. Large debris (concrete, railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. Dust suppression was implemented on the site roads by spraying water. ERRS continued excavating contaminated soil from the southeast area of the site. The overburden was excavated to get to the visibly contaminated soil. This overburden was kept separate from the visibly contaminated soil and was sifted to remove the small debris. The sifted soil from the overburden was stockpiled onsite for potential future use. The contaminated soil excavated onsite began to be staged in the new stockpile. Test pits were dug after the visibly contaminated

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soil had been removed in order to determine if further contamination was present at depth. The excavated areas were then graded to promote site drainage. On June 04, 2002, START procured an analytical request for a CLP lab to verify the XRF readings. On June 04, 2002, ERRS unearthed a rectangular concrete structure approximately 60 feet southeast of the abandoned building. The structure had been backfilled with bricks, had many small pipes leading into it, and had perched water in it. Coal tar contamination surrounded the structure. ERRS dismantled and removed the concrete structure. On June 05, 2002, ERRS unearthed a tank approximately 20 feet east of the concrete structure. The tank was approximately 65 feet long, 10 feet wide, and 4 feet deep. The tank appeared to be an old railcar and the top half of the tank had been cut off. Large amounts of coal tar, bricks, pipes, and railroad ties were present in the tank and in the surrounding soils. ERRS removed the contents of the tank and pulled the tank from the ground. The tank was then cut into smaller pieces and was transported to the power washing station where the tank was subsequently cleaned. On June 06, 2002, Mr. Taylor arrived onsite and inspected the PRP's treatment system. On June 07, 2002, Anthony Horton from the City of Fairmont arrived onsite to get an update on the status of the abandoned building. On June 07, 2002, START shipped 20 soil samples to be analyzed for TAL Metals and to verify the XRF field results. Using a GPS unit, START recorded the locations of the underground water and electric lines to the PRP treatment system. One truckload of contaminated soil was transported to Ross Incineration Services in Grafton, Ohio.

June 10 through June 15, 2002

ERRS continued to maintain site roads, maintain silt fences, and continued to power wash the contaminated concrete pieces. The power washed concrete pieces were then separated into a "clean" and "dirty" pile. Large debris (concrete, railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. Dust suppression was implemented on the site roads by spraying water. ERRS continued excavating contaminated soil from the southeast area of the site. The overburden was excavated to access the visibly contaminated soil. This overburden was kept separate from the visibly contaminated soil and was sifted to remove the small debris. The sifted soil from the overburden was stockpiled onsite for future uses. The contaminated soil excavated onsite continued to be staged in the new stockpile. Test pits were dug after the visibly contaminated soil had been removed in order to determine if further contamination was present at depth. The excavated areas were then graded to promote site drainage. Twenty-four truckloads of contaminated soil were transported to Onyx Environmental Services in Port Arthur, Texas, and four loads were transported to Ross Incineration Services in Grafton, Ohio. On June 13, 2002, Mr. Taylor arrived onsite and inspected the PRP's treatment system. On June 15, 2002, AMI, ERRS asbestos sub-contractor, arrived onsite and removed the asbestos from the abandoned building.

June 17 through June 22, 2002

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ERRS continued to maintain site roads, maintain silt fences, and power wash the contaminated concrete pieces in order to remove coal tar. The power washed concrete pieces were then separated into a "clean" and "dirty" pile. Large debris (concrete, railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. Dust suppression was implemented on the site roads by spraying water. ERRS continued excavating contaminated soil from the southeast area of the site. The non-contaminated soil (overburden) was excavated to access the visibly contaminated soil. This overburden was kept separate from the visibly contaminated soil and was sifted to remove the small debris. The sifted soil from the overburden was stockpiled onsite for future uses. The contaminated soil excavated onsite continued to be staged in the new stockpile. Test pits were dug after the visibly contaminated soil had been removed in order to determine if further contamination was present at depth. The excavated areas were then graded to promote site drainage. On June 17, 2002, ERRS began to demolish the abandoned building. Dust suppression was implemented as needed during the demolition. Debris (concrete, steel, and brick), originating from the demolition of the building, was separated and staged into their respective piles. ERRS completed the demolition of the building on June 20, 2002, and began to break up the concrete floor and concrete pads located under the building on June 21, 2002. The floor of the building consisted of two concrete layers. Under the first layer of concrete was a dark ash-like material, and under the second concrete layer was a reddish color material mixed in with pea sized gravel. All contaminated soil excavated was transported to the new stockpile. During the week of June 17, 2002, 20 truckloads of contaminated soil were transported to Onyx Environmental Services in Port Arthur, Texas, and two loads were transported to Ross Incineration Services in Grafton, Ohio. Rolloff boxes loaded with metal debris and railroad ties were transported offsite on June 21, 2002, to Meadowfill Landfill in Bridgeport, West Virginia. Wood chips, garnered from the chipping of trees along the road to the pond, were spread out over the excavated areas at the southeast side of the site.

June 24 through June 29, 2002

ERRS continued to maintain site roads, maintain silt fences, and continued to power wash the contaminated concrete pieces. The power washed concrete pieces continued to be separated into a "clean" and "dirty" pile. Large debris (concrete, railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. Dust suppression was implemented on the site roads by spraying water. ERRS continued excavating contaminated soil from the area surrounding and under the demolished building. The concrete was removed first and was separated and staged in the concrete pile. Large amounts of contaminated soil and pipes with coal tar oozing from them were present. A 12-inch metal pipe was unearthed from the northeast corner of the site. The pipe appeared to be an old water main, and ran underneath the site fence line. The overburden was excavated first to access the visibly contaminated soil. This overburden was kept separate from the visibly contaminated soil and was sifted to remove the

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small debris. The sifted soil from the overburden was stockpiled onsite for future uses. The contaminated soil excavated onsite continued to be staged in the new stockpile. Test pits were dug after the visibly contaminated soil had been removed in order to determine if further contamination was present at depth. The excavated areas were backfilled if necessary and then graded to promote site drainage. During the week of June 24, 2002, 12 truckloads of contaminated soil were transported to Onyx Environmental Services in Port Arthur, Texas. The transportation of contaminated soil from the PRP's previous removal work has been completed.

A total of 134 truckloads of contaminated soil weighing 3,012 tons had been transported and disposed of from the site. ERRS loaded metal debris into a rolloff box and it was transported offsite to Meadowfill Landfill. ERRS began to transport backfill to the northeast corner of the site along the fence line. The area was backfilled and graded to promote surface water drainage.

On June 27, 2002, RPM Matta and WVDEP Bass arrived onsite and performed a site walkthrough with OSC Easton and START. Mr. Taylor from ESC, the PRP's contractor, arrived onsite on June 27, 2002, and inspected the treatment system. On June 29, 2002, ERRS collected samples of the sifted soil.

July 01 through July 02, 2002

ERRS continued to maintain site roads, maintain silt fences, and power wash the contaminated concrete pieces. The power washed concrete pieces continued to be separated into a "clean" and a "dirty" pile. Large debris (concrete, railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. Dust suppression was implemented on the site roads by spraying water. ERRS continued excavating contaminated soil from the area surrounding and under the demolished building. The overburden was excavated first to access the visibly contaminated soil. This overburden was kept separate from the visibly contaminated soil and was sifted to remove the small debris. The sifted soil from the overburden was stockpiled onsite for potential future uses. The contaminated soil excavated onsite continued to be staged in the new stockpile. Test pits were dug after the visibly contaminated soil had been removed in order to determine if further contamination was present at depth. The excavated areas were backfilled if necessary and then graded to promote site drainage. On July 02, 2002, ERRS demobilized for the July 4th holiday. Prior to ERRS demobilizing, all equipment was decontaminated and the covers on the stockpiles were fastened.

July 09 through July 13, 2002

ERRS continued to maintain site roads, maintain silt fences, and power washed the contaminated concrete pieces, pipes, and railroad ties in order to remove coal tar. The power washed concrete pieces continued to be separated into a "clean" and "dirty" pile. Large debris (concrete, railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. Dust suppression was implemented on the site roads by spraying water. ERRS continued excavating contaminated soil from the area surrounding and under the demolished building. Many bricks

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and pieces of pipe were excavated from the area surrounding the demolished building. Thick coal tar was observed oozing from the pipes and was also mixed in with the bricks. ERRS pressure washed the pipes to remove the coal tar. The overburden was excavated first to access the visibly contaminated soil. This overburden was kept separate from the visibly contaminated soil and was sifted to remove the small debris. The sifted soil from the overburden was stockpiled onsite for future use. The contaminated soil excavated onsite continued to be staged in the new stockpile. Test pits were dug after the visibly contaminated soil had been removed in order to determine if further contamination was present at depth. The excavated areas were backfilled if necessary and then graded to promote site drainage. The soil used to backfill the excavated areas, originated from the construction of the access road to the pond. Approximately 50 feet northwest of the demolished building, the pipeline from the PRP's treatment system was uncovered. The pipe carried the treated water from the treatment system offsite to a nearby sewer manhole. Care was taken not to damage the pipe as coal tar contamination surrounding the pipe was excavated by ERRS. START recorded the location of the effluent line from the PRP's treatment system with a GPS unit. On July 09, 2002, Mr. Taylor arrived onsite to inspect the PRP's treatment system and prepared the treatment system for a carbon filter change out. On July, 10, 2002, Mr. Taylor, and the sub-contractor responsible for delivering the carbon arrived onsite and changed the carbon filter. On July 10, 2002, START noticed a coal tar seep coming from the side wall of the collection system in the East Tributary. START was notified by ERRS on July 10, 2002 that coal tar contamination extended underneath the fence line at the northeast portion of the site. Bricks and ash were also present underneath and across fence line. On July 11, 2002, ERRS notified START of a layer of coal tar contamination present near the gate of the eastern access road to the site. ERRS proceeded to excavate the contamination, backfilled the area, and then placed crush and run over the backfill to restore the access road to the prior condition. On July 12, 2002, ERRS dismantled and removed the decontamination pad set up during the previous PRP removal action. Coal tar contamination was present under the pad and in the surrounding soils. ERRS excavated the contamination. On July 13, 2002, ERRS began to clear and grub the area south-southeast of the PRP's treatment trailer. This area had coal tar bubbling up from the ground surface.

July 15 through July 20, 2002

ERRS continued to maintain site roads, maintain silt fences, and power wash the contaminated concrete pieces, pipes, and railroad ties. Re-bar sticking out of the concrete pieces was cut and staged for future disposal. The power washed concrete pieces continued to be separated into a "clean" or "dirty" pile. Large debris (concrete, railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. Dust suppression was implemented on the site roads by spraying water. ERRS completed the excavation of coal tar contaminated soils northwest of the demolished building and removed and pressure washed the contaminated pipes and debris from this area. Test pits were dug in the excavated area to determine if

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additional coal tar was present at depth. The excavated area was then backfilled and graded to promote site drainage. The soil used to backfill the excavated areas, originated from the construction of the access road to the pond. On July 15, 2002, ERRS began to remove a concrete pad located just east of the road leading to the PRP's treatment trailer. ERRS excavated a portion of the pad approximately 25 feet long, 15 feet wide, and 1.5 feet thick. Gravel and perched black oily water was present under the pad. All contamination was subsequently removed by ERRS and the area was backfilled. The pad extended underneath the road but was temporarily left there to keep the road intact. On July 16, 2002, Mr. Taylor arrived onsite and inspected the PRP's treatment system. ERRS began excavation of coal tar contaminated soil in the area south-southeast of the PRP's treatment trailer. A silt fence was installed surrounding the area to be excavated. Excavation began on the peninsula above the manhole in the East Tributary. At first, the contamination appeared to only be hardened slabs of coal tar at the surface. After excavating further away from the hillside, additional coal tar began to be discovered at different depths. A test pit was excavated to determine the depth to which the coal tar was present. Thick semi-solid coal tar mixed with items such as; bricks, ash, glass, planks, plastic, and material appearing to be bentonite was discovered at different depths ranging from the surface to 15 feet below ground surface (bgs). ERRS proceeded to dig test pits in the surrounding area to determine the extent of contamination. A total of 11 test pits were dug in this area and all had large amounts of semi-solid coal tar present in them. START photographed and recorded the location of the test pits with a GPS unit. Due to the large amounts of coal tar present, the coal tar was left in the ground and the area was fenced off. On July 20, 2002, ERRS began excavating an area 50 feet north of the pressure washing station. START looked at the PRP's old facility map and the area being excavated was in the vicinity of where an acid plant was formerly located. A large concrete pad 10 feet in diameter and 2 feet thick was excavated. The pad had yellow staining on it and a sulfur smell was present. Wooden boards, concrete, sheet metal, pipes, and coal tar was present in this area and was subsequently excavated by ERRS.

July 22 through July 26, 2002

ERRS continued to maintain site roads, maintain silt fences, and power wash the contaminated concrete pieces. The power washed concrete pieces continued to be separated into a "clean" or "dirty" pile. Large debris (railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. Dust suppression was implemented on the site roads by spraying water. ERRS continued excavating contaminated soil and debris from the area above the pressure washing station. This area was excavated up to the road leading to the command post. Contamination continued under the road but was left behind to avoid excavation of the road. As ERRS continued to excavate the area adjacent to the road, viscous coal tar was encountered. A 4 foot thick, and approximately 8 feet in diameter, concrete pad was also encountered and removed from this area. The excavated areas were then backfilled and graded

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to promote surface water drainage. On July 23, 2002, WVDEP Bass and Ellison arrived onsite and performed a site walkthrough. EPA showed WVDEP the large amounts of semi-solid coal tar located on the peninsula above the manhole in the East Tributary. WVDEP requested a copy of all the analytical results from soil samples collected onsite. On July 26, 2002, ERRS demobilized for a long weekend.

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July 29 through August 03, 2002

ERRS continued to maintain site roads, maintain silt fences, and power wash the contaminated concrete pieces. The power washed concrete pieces continued to be separated into a “clean” or “dirty” pile. Large debris (railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. Dust suppression was implemented on the site roads by spraying water. ERRS continued to excavate the area adjacent to the road. On July 31, 2002, WVDEP Bass and EPA Matta arrived onsite and performed a site walkthrough. The large concrete pads found onsite were broken into small pieces using a hydro-hammer. On August 01, 2002, ESC's Mr. Taylor was onsite to monitor the flow and meter readings of the treatment system. ERRS continued to grade the backfilled areas and the contaminated soil stockpiles. On August 02, 2002, a load of scrap metal was transported from the site. On August 03, 2002, RSI, ESC's sub-contractor, arrived onsite and worked on the treatment system.

August 05 through August 10, 2002

ERRS continued to maintain site roads, maintain silt fences, and power wash the contaminated concrete pieces. The power washed concrete pieces continued to be separated into a “clean” or “dirty” pile. Large debris (railroad ties, pipes, and scrap metal) was separated out of the contaminated soil and power washed. Dust suppression was implemented on the site roads by spraying water. ERRS continued excavation and backfilling the area where the two large concrete pads were previously located. A thick metal spherical tank approximately four feet in diameter that contained coal tar was discovered and removed from this area. Test pits were constructed and monitored to determine the extent of contamination of the adjacent soils. START collected the GPS coordinates for the locations of these test pits. ERRS continued backfilling and grading of the excavated area such that the surface water would follow the natural drainage pathway. ERRS covered and constructed silt fencing and haybales around the soil stockpile. On August 07, 2002, Cheyne Gross of ESC, arrived onsite and inspected the treatment system. A representative from the City of Fairmont publicly owned treatment works (POTW) also arrived onsite and collected a water sample from the treatment system. On August 08, 2002, Anthony Horton, a representative from the City of Fairmont, arrived onsite and checked on the status of the condemned building onsite. START and Mr. Horton performed a site walk through.

August 13 through August 16, 2002

ERRS continued excavation from the area where the two large concrete pads were previously located. ERRS continued to backfill and grade the excavated area in such a way that surface water would follow the natural drainage pathway. ERRS constructed test pits in the excavated areas prior to backfilling and START documented and collected GPS coordinates for each test pit. ERRS prepared for demobilization. ERRS dismantled the water trailer, secured and covered stockpiles, collected miscellaneous debris onsite, graded roads onsite and

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decontaminated equipment. On August 15, 2002, Mr. Taylor from ESC, arrived onsite and monitored the treatment system. On August 16, 2002, ERRS demobilized equipment and personnel for a temporary site shutdown. A security guard continued to be present at all times to prevent unauthorized access to the site.

August 20 through October 10, 2002

During the temporary site shutdown, START continued to assist the OSC with drafting an additional funding request memo. START continued to update EPA and START cost tracking. START coordinated with the EPA Client Service Team regarding analytical results. START also continued to escort the PRP's contractor, Mr. Taylor of ESC, onsite so he could change the bag filters in the treatment system and examine the manholes of the East and Middle Tributaries.

On August 30th, September 5th, September 20th, and October 3, 2002, START escorted the PRP's contractor onsite. On September 26, 2002, the Director of Hazardous Sites Cleanup Division signed a request for additional funding and an exemption of the 12 month and \$2 million statutory limits for a removal action. Due to contractual restrictions, the removal work was split between Guardian and Shaw. Shaw was contracted to handle the remediation of the pond near the Monongahela River and the disposal of all onsite stockpiles of excavated material.

Guardian was contracted to remove the coal tar contamination from within Unnamed Tributary #1. ERRS (Guardian) was scheduled to return to the site on October 07, 2002, and prepare the site for work to resume. On October 10, 2002, START arrived on site to oversee ERRS work. ERRS mobilized equipment and personnel to the site and began to install utilities to the site. The bridge, which was constructed over the gas line, had partially collapsed and silt fences needed repaired. ERRS began to correct these problems.

October 15 through October 17, 2002

On October 15, 2002, START arrived onsite and met with OSC Easton, and ERRS (Shaw) RM. A site walkthrough was performed, and the cleanup of the pond and disposal of the stockpiled soil was discussed. OSC received written consent of access from Art Chin of Exxon Mobil to perform removal operations on their property. ERRS began to clear and grub the area surrounding Unnamed Tributary #1, removed the section of fence line which crossed the tributary, began construction on an access road to the upper regions of the tributary, and repaired the bridge over the gas line. On October 16, 2002, OSC directed ERRS to construct an underground vertical clay barrier which will surround the highly contaminated area above the East Tributary's manhole. In this area, coal tar was discovered in great quantities up to 15 feet below the ground's surface. The clay barrier was to be constructed to minimize the migration of coal tar into Unnamed Tributary #1. It was agreed upon, that the clay barrier was to be 15 feet deep and 3 feet wide. On October 17, 2002, Mr. Taylor of ESC, arrived onsite and changed the bag filters in the treatment trailer, collected a water sample from the treatment system, and inspected the manholes in the East and Middle Tributaries.

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October 21 through October 26, 2002

ERRS continued clearing and grubbing of Unnamed Tributary #1, installing silt fences, and maintaining site roads. START observed mounds of what appeared to be coke breeze on the hillside above Unnamed Tributary #1. The OSC requested the material be left in place because it was not in the scope of work to remove it and the surface water runoff wasn't directly impacting the tributary. To assist in surface water drainage, ERRS installed a 6 inch corrugated drainage pipe under the access road in the upper region of the Unnamed Tributary # 1. Clay was delivered to the site for construction of the clay barrier. On October 24, 2002, ERRS constructed a temporary dam across the upper-most regions of Unnamed Tributary #1. The dam was constructed to allow the excavation of contaminated sediments within the tributary. The dammed water was routed around the excavation area through a 6-in. corrugated plastic pipe that allowed the section to dry out prior to excavation. Excavation of the contaminated sediments was postponed due to a sampling issue with the PRP. On October 25, 2002, ERRS began the installation of the clay barrier. A trench, 3 feet wide and approximately 15 feet deep began to be excavated. Coal tar was observed oozing from some of the side walls of the trench. Clean imported clay was then backfilled in the trench and compacted using the bucket of the excavator.

October 28 through November 02, 2002

ERRS continued clearing and grubbing of areas surrounding Unnamed Tributary #1, installing the clay barrier, and maintaining site roads and silt fences. START updated cost tracking. Topsoil was delivered to the site for future seeding operations. Clay, to be used for the clay barrier, continued to be delivered to the site. A tractor with a discs attachment and a sifter was transported to the site. The sifter was to be used to resume sifting debris from stockpiled overburden. Upon the request of RPM Matta, START faxed him the analytical data from the previous stockpiles of K-listed waste and data from coal tar seeps. On October 30, 2002, Mr. Taylor of ESC arrived onsite, changed the bag filters in the treatment trailer, and inspected the manholes in the East and Middle Tributaries. Hardened coal tar contamination was discovered on the hillside near the manhole in the East Tributary. OSC Easton noted that coal tar contamination should be left in place until the clay barrier is completed. The OSC was concerned that if the hardened contamination was removed now, there may be additional viscous contamination underground, which would begin to migrate if disturbed. Clearing of the shrubs on the hillside was performed to better assess the area. On October 31, 2002, START completed the sampling plan for the post excavation sampling of Unnamed Tributary # 1 that was scheduled to begin on November 12, 2002. While digging the trench for the clay barrier, additional coal tar was observed oozing from the sides of the trench at approximately 2 feet to 10 feet deep. Contaminated soil excavated from the construction of the clay barrier was transported to the contaminated soil stockpile located at the northwest area of the site.

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November 04 through November 07, 2002

ERRS continued clearing and grubbing the surrounding areas of Unnamed Tributary #1, installing the clay barrier, and maintaining site roads and silt fences. Contaminated soil excavated from the construction of the clay barrier continued to be transported to the contaminated soil stockpile located at the northwest area of the site. Clay for the construction of the clay barrier, continued to be transported to the site. ERRS had temporarily staged the imported topsoil in small mounds throughout the northeastern area of the site. Some of the topsoil which had been delivered to the site had bricks in it. Using the sifter, ERRS sifted the bricks from the topsoil. Once the bricks were removed from the topsoil, ERRS began to evenly spread the topsoil over the entire northeastern area of the site. This area had been disturbed by the previous removal of contaminated soils. On November 06, 2002, OSC notified START that Exxon Mobil had denied permission to the PRP's contractor, ESC, to collect samples in Unnamed Tributary #1 prior to excavation. Exxon Mobil is the current property owner of the parcel which Unnamed Tributary #1 is situated on. The excavation of the contaminated sediments within Unnamed Tributary #1 was scheduled to begin. START continued to draft POLREPS, and update EPA and START cost tracking.

November 12 through November 16, 2002

ERRS continued spreading top soil, sifting debris from topsoil, installing the clay barrier, and maintaining site roads and silt fences. Topsoil continued to be delivered to the site. On November 12, 2002, the PRP's contractor, Mr. Taylor, arrived onsite, changed the bag filters in the treatment trailer, and inspected the manholes in the East and Middle Tributaries. On November 13, 2002, ERRS excavated the surrounding soils from two underground storage tanks discovered northwest of the concrete shed. The exact location of the tanks were recorded by START using a GPS unit. One tank contained approximately 60 gallons of gasoline, and the other tank contained approximately 2,700 gallons of diesel. The tanks appeared to be in good condition and were not leaking. On November 14, 2002, Petroleum Recyclers arrived onsite and pumped approximately 2,765 gallons of gasoline and diesel fuel from the underground storage tanks. ERRS removed the tanks from the ground, staged them in the northwest area of the site, and backfilled the area. START continued updating START and EPA cost tracking. On November 15, 2002, ERRS completed the installation of the clay barrier. The clay barrier was constructed approximately 15 feet deep and three feet wide and was approximately 400 feet long. ERRS installed banner tape around the area where the clay barrier was located.

November 18 through November 23, 2002

On November 18, 2002, ERRS began excavation of contaminated sediments from Unnamed Tributary #1. Prior to commencement of the excavation in Unnamed Tributary #1, silt fences and hay bales were placed downstream of the excavation area to minimize sediment migration. The tributary was excavated down to bedrock, approximately 2 to 5 feet deep, and the excavated

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material was transported to a lined stockpile at the northwest area of the site. The contaminated sediments excavated up-gradient of the fence line in Unnamed Tributary #1 were staged separately from the sediments to be excavated down-gradient of the fence line. START performed air monitoring throughout the site. Elevated levels of organic vapors were detected at the excavation area of Unnamed Tributary #1. START notified ERRS of elevated levels and recommended they upgrade to Level C personal protective equipment (PPE). On November 21, 2002, START collected two surface water samples from the dammed water prior to it flowing into Unnamed Tributary #1. Five surface water samples, to be analyzed with the gas chromatograph (GC) in the Wheeling START office, were collected from background locations and from the excavation area of Unnamed Tributary #1. Seven sediment samples were collected from Unnamed Tributary #1, post-excavation, as well as background locations. The background sediment and surface water samples were collected from Pricket Creek flowing near Prickett's Fort. All sample locations were recorded using a GPS unit. On November 22, 2002, START shipped all samples to be analyzed by CLP to the appropriate laboratories for analysis. The samples to be analyzed with the GC by START were transported to the Wheeling office to begin analysis. ERRS continued to maintain site roads and silt fences. Topsoil continued to be delivered to the site and temporarily staged in small mounds.

November 25 through November 27, 2002

ERRS continued excavation of contaminated sediments from Unnamed Tributary #1, sifting debris from staged soil, and maintaining site roads and silt fences. On November 25, 2002, during the daily safety meeting, it was recommended that all workers should wear orange colored clothes due to the many hunters in the area. START performed air monitoring. Elevated levels were detected at the excavation area in Unnamed Tributary #1 but were not sustained. Backfill and stone were delivered to the site. The fill would be used to backfill the excavated Unnamed Tributary #1, and stone would be placed in the water channel of the restored tributary. ERRS completed excavating the contaminated sediments up-gradient of the fence line in Unnamed Tributary #1. On November 26, 2002, Mr. Taylor of ESC, arrived onsite, changed the bag filters in the treatment trailer, and inspected the manholes in the East and Middle Tributaries. On November 27, 2002, ERRS demobilized from the site due to the Thanksgiving holiday.

December 03 through December 07, 2002

On December 03, 2002, ERRS resumed site work. ERRS continued excavation of contaminated sediments from Unnamed Tributary #1, sifting debris from staged soil, and maintaining site roads and silt fences. ERRS continued to spread topsoil over the northeastern area of the site. The section of Unnamed Tributary #1 down-gradient of the fence line, was being excavated and staged separately in a lined stockpile. On December 03, 2002, START collected nine sediment samples from the excavated section of Unnamed Tributary #1. The tributary had been excavated down to bedrock. After post-excavation samples were collected from the tributary, ERRS began

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to line the Unnamed Tributary # 1 bed with a geo-textile fabric. The fabric was laid in such a way that it covered the entire Unnamed Tributary # 1 bed to approximately half way up on both side walls. Imported fill was placed on top of the fabric to bring the tributary back up to the original grade. Stone was then placed where the water channel would be located. On December 04, 2002, START completed labeling and packaging of the samples and shipped them to the appropriate laboratories for analysis. On December 05, 2002, Mr. Taylor of ESC, arrived onsite, changed the bag filters in the treatment trailer, and inspected the manholes in the East and Middle Tributaries. Snow had to be cleared from site roads by ERRS. On December 06, 2002, START noticed that the water flow in Unnamed Tributary #1 had dramatically increased. It was later determined that the increase was due to a break in the water line up-gradient of the tributary.

On December 07, 2002, ERRS constructed a new dam in Unnamed Tributary #1 adjacent to the fence line. In order to keep the surface water from flowing into the excavation areas, new dams would have to be constructed as ERRS progressed down the tributary. The first dam was dismantled once the new dam was completed.

December 09 through December 14, 2002

ERRS continued excavation of contaminated sediments from Unnamed Tributary #1, sifting debris from staged soil, and maintaining site roads and silt fences. Backfill continued to be delivered to the site. Topsoil continued to be spread throughout the northeastern area of the site.

Silt fence was installed on each side of the restored Unnamed Tributary #1 to minimize the migration of silt into the tributary. ERRS re-installed the fence across Unnamed Tributary #1. On December 09, 2002, Enviroscan, a START subcontracted geophysical surveyor, arrived onsite and conducted a site walkthrough with START. RPM Chris Matta had requested START to contract a geophysical surveyor to survey the subsurface of the site and Enviroscan had been awarded the subcontract to perform the survey. The geophysical survey began on December 09, 2002. On December 11, 2002, RPM Matta arrived onsite and inspected the progress of the geophysical survey being conducted. On December 10, 2002, START collected water samples from Unnamed Tributary #1. Six water samples were collected and analyzed with the GC located in the START office. Two water samples were collected to be analyzed by a CLP lab. On December 11, 2002, six sediment samples were collected from the excavated section of Unnamed Tributary #1. The two water samples and six sediment samples were shipped to the appropriate CLP labs. On December 12, 2002, under the request of OSC, ERRS began to clear and grub the northwest area of the site. The geophysical survey would be conducted in this area and swaths needed to be cleared for the survey equipment to work correctly. START photocopied validated analytical results for the PRP's contractor, Mr. Taylor of ESC. The data was being compiled pursuant to the Request for Data letter submitted by Environmental Strategies Corporation, dated November 26, 2002. On December 13, 2002, Enviroscan demobilized from the site and scheduled a return to complete the geophysical survey on January 13, 2003.

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December 16 through December 19, 2002

ERRS continued excavation of contaminated sediments from Unnamed Tributary #1, sifting debris from staged soil, clearing and grubbing in the northwest area of the site, and maintaining site roads and silt fences. ERRS skimmed contaminated soil approximately 20 feet up from the left descending bank (LDB) of Unnamed Tributary #1. START discussed taking aerial photographs of the site with the OSC. The OSC agreed and requested START to make the appropriate preparations. START made a reservation with KCI aviation in Bridgeport, WV. On December 17, 2002, START took aerial photographs of the site. On December 17, 2002, START collected six water samples to be analyzed with the GC, and two water samples to be analyzed by a laboratory. On December 18, 2002, START collected 15 sediment samples to be analyzed by a laboratory. All samples were collected from Unnamed Tributary #1 after excavation of contaminated sediments had been completed. On December 19, 2002, Mr. Taylor of ESC, arrived onsite, changed the bag filters in the treatment trailer, and inspected the manholes in the East and Middle Tributaries. ERRS prepared the site for an extended shutdown. On December 20, 2002, ERRS demobilized from the site for the Christmas holiday. Security guards were present onsite at all times after ERRS departed from the site. ERRS scheduled to resume site work on January 07, 2003.

January 07 through January 11, 2003

ERRS resumed site operations on January 07, 2003. ERRS continued sifting debris from staged soil, clearing and grubbing in the northwest area of the site, and maintaining site roads and silt fences. ERRS began to backfill the excavated section of Unnamed Tributary #1. Backfill and stone continued to be delivered to the site. Stone was placed in the water channel of the restored Unnamed Tributary #1. On January 08, 2003, START and the OSC met with Fred Roman of the Sanitary Sewer Board of Fairmont and discussed the potential disposal of onsite pond water. Mr. Roman presented START with a list of parameters to be analyzed for and the maximum concentrations allowed. On January 08, 2003, Mr. Taylor of ESC, arrived onsite, changed the bag filters in the treatment trailer, and inspected the manholes in the East and Middle Tributaries. START continued to work on the data package requested by PRP's contractor, pursuant to the Request for Data letter, dated November 26, 2002.

January 13 through January 18, 2003

ERRS continued sifting debris from staged soil, clearing and grubbing in the northwest area of the site, and maintaining site roads and silt fences. Backfill and stone were delivered to the site. On January 13, 2003, ERRS began construction on a new dam in Unnamed Tributary #1 adjacent to the manhole in the East Tributary. The previous dam upstream was dismantled once the new dam was completed. ERRS resumed excavation of contaminated sediments from within Unnamed Tributary #1. The access road that crossed Unnamed Tributary #1 near the East Tributary's manhole was removed due to large amounts of contamination being present. Large

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amounts of coal tar were also observed seeping from the areas surrounding the East Tributary's manhole. While excavation of contaminated areas occurred, care was taken to not disturb the PRP's collection system. The contaminated sediments were excavated and transported to a lined stockpile. The access road was restored to its original state after the contamination was removed. On January 13, 2003, Enviroscan arrived onsite and resumed the geophysical survey. The wooded northwest area of the site had swaths cut into it and the survey was performed in this area. On January 17, 2003, Enviroscan completed the field work for the geophysical survey. On January 17, 2003, in regards to the Request for Data letter, dated November 26, 2002, START completed and shipped three copies of Analytical and Corresponding Information to EPA attorney Pugh-Winkler. Ms. Pugh-Winkler reviewed the data package and forwarded a copy to the PRP's contractor, Mr. Taylor, of ESC. On January 18, 2003, START and the OSC conducted a site walkthrough. During the site walkthrough, the OSC agreed that the hardened coal tar contamination on the hillside near the East Tributary's manhole would not be removed at this time.

January 20 through January 23, 2003

ERRS continued excavation of contaminated sediments from Unnamed Tributary #1, sifting debris from staged soil, clearing and grubbing, and maintaining site roads and silt fences. On January 20, 2003, START observed ERRS excavating the contamination on the hillside near the East Tributary's manhole. ERRS was also backfilling the excavation areas prior to samples being collected from them. START photo documented the questionable excavation areas. START met with the ERRS RM and pointed out that the OSC Easton did not want the contamination removed at this time. START mentioned to the ERRS RM that the current excavation areas should not be backfilled until samples could be collected. START updated OSC Easton on current site conditions. Four points were discussed: 1-Areas of current excavation on hillside, 2-Samples needing to be collected prior to backfilling, 3-There are no labs currently set up and to do so would take approximately two weeks. Collecting samples now would be futile since the holding times would be exceeded, and 4-OSC Downie would be onsite January 21, 2003 to decide the future course of action. OSC Easton requested that ERRS should not backfill prior to sample collection. On January 21, 2003, OSC Downie arrived onsite. OSC Easton, OSC Downie, and START conducted a conference call. During the call it was agreed that the questionable area of excavation on the hillside was beyond the original scope of proposed excavation, that the area would be lined with geo-textile fabric and backfilled, and that no soil samples would be collected in this area prior to backfilling. ERRS laid geo-textile fabric and backfilled the area with clay. Contaminated sediments continued to be transported to the lined stockpile. On January 21, 2003, Mr. Taylor of ESC, arrived onsite, changed the bag filters in the treatment trailer, and inspected the manholes in the East and Middle Tributaries.

January 28 through February 01, 2003

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ERRS continued excavation of contaminated sediments from Unnamed Tributary #1, sifting debris from staged soil, clearing and grubbing, and maintaining site roads and silt fences. On January 28, 2003, START met with Fred Roman of the Sanitary Sewer Board of Fairmont to collect water samples from the pond. Three surface water samples were collected from the pond and shipped to the appropriate laboratories for disposal analysis. ERRS assisted in the sample collection by removing the ice from the sample locations in the pond. Mr. Roman oversaw the sampling event and approved of START's sample collection procedures. All sample locations were recorded using a GPS unit. Excavated contaminated sediments from Unnamed Tributary #1 continued to be transported to a lined stockpile by ERRS. START observed sheens emanating from the bedrock. Sorbent booms were subsequently placed downstream by ERRS. The excavated sections of Unnamed Tributary #1 were lined with a geo-textile fabric and then backfilled with imported clay. A 12 inch metal pipe crossed up and over Unnamed Tributary #1 approximately 70 feet downstream of the confluence with the East Tributary. While excavating the sediments around this pipe a metal saddle (plug) fell off the pipe. It was covering a 1 inch hole in the pipe. When the saddle fell off the pipe, a small amount of black material, which appeared to be coal tar, poured out of the pipe. A solid residue remained in the pipe. ERRS constructed a half inch thick rubber plug with metal brackets and fastened it over the hole. An additional 6 inch pipe ran parallel to the 12-inch pipe. This 6-inch pipe crumbled and fell apart when the sediments surrounding the pipe were excavated. Hardened black material was in the pipe. START performed air monitoring near the excavation area in Unnamed Tributary #1. Elevated levels of organic vapor were detected within the tributary. Levels declined below the action level 20 feet away from the tributary. START recommended ERRS to upgrade to Level C PPE if within 20 feet of the tributary. On January 30, 2003, OSC requested START to complete a thorough and complete property ownership search on the site. START previously had incomplete files regarding the property ownership. On January 31, 2003, Jones Sanitation, a potential disposal contractor, met with the ERRS response manager at the pond and discussed disposal of the pond water. On January 31, 2003, Mr. Taylor of ESC, arrived onsite, changed the bag filters in the treatment trailer, and inspected the manholes in the East and Middle Tributaries. Mr. Taylor had questions regarding the Analytical and Corresponding Information. START informed Mr. Taylor that the OSC would have to approve of any further work regarding the Analytical and Corresponding Information. START continued to draft POLREPs, and update EPA and START cost tracking.

February 03 through February 08, 2003

ERRS continued excavating contaminated sediments from Unnamed Tributary #1, transporting contaminated sediments to a lined stockpile, sifting debris from staged soil, and maintaining site roads and silt fences. START prepared for sampling of sediments and surface water within the excavated sections of Unnamed Tributary #1. START noted and photographed coal tar contamination seeping from both banks of the excavated Unnamed Tributary #1. The coal tar

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contamination could not be further excavated because it would cause the hillside to become unstable. The tributary had been excavated down to bedrock, which was later determined by START and ERRS to be coal. Small sheens were prominent on the excavated Unnamed Tributary # 1 bed. On February 04, 2003, START collected two surface water and nine sediment samples from the excavated Unnamed Tributary #1. Sediment samples could not be collected from the center of the excavated Unnamed Tributary #1 due to the hardness of the bedrock. Three surface water samples were also collected from Unnamed Tributary #1 and transported to the Wheeling START office to be analyzed with the GC. On February 05, 2003, all samples were shipped to the appropriate laboratories. After all samples were collected, a geo-textile fabric was placed on the bottom of the Unnamed Tributary # 1 bed and on the side banks of the excavated tributary. Backfill and stone were then placed on the layer of fabric. On February 05, 2003, the OSC notified START that the validated data from a sample delivery group (SDG) under Case No. 31167 could not be used due to improper lab instrument calibration. On February 06, 2003, the OSC Easton forwarded START an e-mail from RPM Matta. The e-mail contained a memo describing how samples should be collected from the waste piles staged onsite, and what analysis should be performed on the samples for potential de-listing options. START was requested to collect the samples and prepare for the analysis to be performed. START updated the sample map displaying locations of samples.

February 10 through February 13, 2003

ERRS continued backfilling and placing stone in Unnamed Tributary #1, continued sifting debris from staged soil, and continued maintaining site roads and silt fences. On February 10, 2003, Mr. Taylor of ESC, arrived onsite, changed the bag filters in the treatment trailer, and inspected the manholes in the East and Middle Tributaries. Mr. Taylor also collected samples from the filter bags to verify the effectiveness of the carbon vessels. ERRS removed the last dam in Unnamed Tributary #1. The dam and its surrounding soil/sediment was excavated and transported to the lined stockpile. Contamination was prevalent in this area and was observed seeping from the shale bedrock and from the area near the East Tributary's manhole. START recommended to ERRS that oil absorbent pads be used to minimize the contamination from migrating downstream. On February 11, 2003, ERRS completed the restoration of Unnamed Tributary #1. The section of Unnamed Tributary #1 from the upper-most regions down to the confluence with Sharon Steel Run had been excavated, lined with geo-textile fabric, backfilled with imported clay, and topped with stone. Silt fences were being installed on each side of the restored tributary to minimize silt from migrating into Unnamed Tributary #1. On February 12, 2003, the preliminary data of surface water samples from the pond were provided to Mr. Roman.

On February 13, 2003, Mr. Roman arrived onsite and measured the pH of the pond. The pH was measured to be 3.97 and 4.00 at two separate locations within the pond. Mr. Roman mentioned that he would discuss the preliminary data results with the state permitting department and his supervisor. He also requested that the pH be elevated prior to a permit being

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administered for the disposal of the pond water into the city sewer system. On February 14, 2003, ERRS demobilized from the site.

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February 19 through February 22, 2003

ERRS mobilized to the site on February 19, 2003. ERRS worked on clearing snow from the site. A blizzard had dumped approximately 2 to 3 feet of snow on the ground. The stockpiles of contaminated soil were scheduled to be sampled next week. ERRS worked on removing the snow from the stockpiles. On February 20, 2003, Mr. Taylor of ESC, arrived onsite, changed the bag filters in the treatment trailer, and inspected the manholes in the East and Middle Tributaries. On February 21, 2003, Mr. Roman notified START that the city would receive the pond water. A formal permit, however, would only be given when the validated data is received. He also suggested that prior to receiving the pond water the pH would have to be increased to 5.0 or greater by adding sodium hydroxide.

February 24 through March 01, 2003

On February 24, 2003, START began preparations for sampling of the onsite stockpiles. ERRS removed snow from the liners on the stockpiles. The approved Sampling Plan Addendum called for collecting two composite samples from each of the six stockpiles. Upon arrival at the site, it was determined that only four stockpiles would be sampled since two of the piles were extensions of the four major stockpiles. The stockpiles were drawn on a map and labeled. Under the direct oversight of RPM Matta, START began to collect samples from the stockpiles. Based on the smaller size of Stockpile #4, it was determined in the field, that only one sample would be collected from Stockpile #4. From the remaining three stockpiles, a composite sample was collected from each half at the approximate center depth of each corner. Samples to be analyzed for volatile organic compounds (VOCs), moisture, and toxicity characteristic leaching procedure (TCLP) VOCs were collected from the first aliquot in each half. To reach the sample location of each aliquot, an excavator was used to dig down to the appropriate depth and bring the sample material to the surface. Care was taken to only collect sample material from the center of the bucket and not from material that may have touched the sides of the bucket. During sample collection, START noticed that all samples were a blackish color and had small amounts of coal tar in them. The bucket of the excavator was decontaminated prior to digging and also between sampling of each pile to prevent cross contamination. A duplicate sample and a matrix spike/matrix spike duplicate (MS/MSD) sample were collected from Stockpile #3. A rinsate sample was collected from the bucket of the excavator after sampling of Stockpile #2 and prior to sampling of Stockpile #5. Disposable sampling equipment was used to collect each sample from the excavator's bucket, thus a rinsate of sampling equipment was not needed. A total of nine samples were shipped to the appropriate laboratories by February 26, 2003. On February 26, 2003, ERRS repaired a collapsed culvert under the site road near the confluence of Sharon Steel Run and Unnamed Tributary #1. On February 27, 2003, ERRS began to remove ice from the pond in order to add sodium hydroxide to the pond water. The sodium hydroxide was to be added to meet the pH requirements. On February 27, 2003, Mr. Taylor of ESC, arrived onsite with sub-contractor Envirotrol to change the carbon from the vessels in the onsite

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treatment system. During the carbon change, the pump within the East Tributary's manhole became clogged with carbon. With the use of an additional pump, Mr. Taylor pumped the water within the East Tributary's manhole into the Middle Tributary's manhole, where it was then pumped up into the treatment system. On February 28, 2003, Mr. Taylor arrived onsite with sub-contractor McCutcheon Enterprises Inc., and fixed the pump. ERRS began preparations for the construction of a dam directly upstream of the pond.

March 03 through March 08, 2003

ERRS continued to construct the dam upstream of the pond. Certain sections of the dam were breached and leaking. ERRS repaired these sections. On March 04, 2003, ESC Doug Taylor arrived on site and changed the filter bags of the treatment system and inspected the manholes of the East and Middle Tributaries. On March 05, 2003, US Liquids, a bidder to pump out the pond water, arrived on site and inspected the pond. ERRS continued to maintain the site roads and silt fence along the banks of the Unnamed Tributary #1. ERRS continued to sift the debris from the soil staged in the northwest area of the site. START demobilized from the site on March 05, 2003. ERRS demobilized from the site on March 07, 2003.

March 10 through March 15, 2003

ERRS and START mobilized to the site on March 10, 2003. The PVC pipe (24" diameter) to be used to divert the water flow from Unnamed Tributary # 1 away from the pond was delivered to the site. ERRS surveyed the road along the pond and the rail-to-trail path to determine the elevation of the road. The elevation data was used to determine the required slope of the diversion pipe. ERRS began leveling the road along the pond to achieve the required slope. Low spots of the road were backfilled and high spots were excavated. ERRS continued to sift the debris from the soil staged in the northwest area of the site.

March 17 through March 22, 2003

ERRS constructed a check dam upstream of the primary dam to prevent clogging of the primary dam with debris. ERRS began excavating a trench in sections along the pond. The trench was excavated with adequate slope to facilitate gravity flow. The trench was lined with geotextile fabric, a 24" diameter pipe was placed in the trench, and the trench was backfilled. The trench excavation, lining, installation of the pipe, and backfilling of the trench continued in sections. On March 20, 2003, ERRS completed installing the diversion pipe and water from Unnamed Tributary #1 stopped flowing into the pond and began flowing through the pipe to the Monongahela River.

ERRS continued to maintain the silt fences along the banks of Unnamed Tributary #1. ERRS continued to sift debris from soil stockpiled on site and maintain site roads. ERRS began grading, leveling, and disking the eastern area of the site in preparation of revegetating the site.

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ERRS backfilled certain low spots in the eastern area to improve surface runoff and prevent ponding of water.

On March 19, 2003, City of Fairmont, Fred Roman arrived on site and checked the pH of the pond water. START and Mr. Roman checked the pH at two locations in the pond. The pH (7.2 and 7.8) was slightly above neutral. Therefore, Mr. Roman indicated that no pH adjustment of the pond water would be required prior to the pond water being discharged into the city sewer system. On March 20, 2003, City of Fairmont issued a permit granting permission to discharge the pond water into the city sewer system.

On March 19, 2003, ESC's Doug Taylor arrived on site and checked the treatment system, collected water samples and inspected the manholes. The manholes located at both the East and Middle Tributaries were full and the pumps were not working. On March 20, 2003, ESC's Doug Taylor, arrived on site with their sub-contractor, McCutcheon Enterprises, Inc., to fix the treatment system. The pump located in the manhole in the Middle Tributary was replaced and the electrical pump triggering mechanism of the Eastern Tributary manhole was fixed. START noticed the pipe from the PRP's treatment system to the city's manhole was punctured and effluent water from the treatment system pipe was leaking out. START informed Doug Taylor of the leak and ESC shut off the treatment system. ESC asked for ERRS assistance in repairing the leak. ERRS excavated the area around the leak and fixed the leak.

ERRS began transporting the pond water to the manhole located on the northeast side of the site, just outside the fence line. A vacuum truck was used to transport the pond water to the manhole. START measured the pH of the pond on a daily basis to ensure that the pH met the criteria in the discharge permit.

March 24 through March 29, 2003

ERRS continued to maintain the silt fences along the banks of Unnamed Tributary # 1. ERRS continued to sift debris from soil stockpiled on site and maintain site roads. The sifted soil was transported to the east side of the site and used as topsoil. ERRS continued grading, leveling, and discing the southeast area of the site in preparation to revegetate this area. ERRS backfilled certain low spots in the southeast area to improve surface runoff and prevent ponding of water.

ERRS continued to transport the pond water to the City of Fairmont's sewer manhole located on the northeast side of the site. On March 24, 2003, R&J Waters, subcontractor to ERRS, arrived on site to assist in draining the pond. The subcontractor utilized three vacuum trucks to pump out the pond water and pumped 87,000 gallons of pond water into the City sewer system. START measured the pH of the pond water before it was drained into the manhole on a daily basis to ensure that the pH met the criteria in the discharge permit. On March 24, 2003, a total of 137,000 gallons of water was pumped out of the pond and discharged into the city's manhole.

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At the end of the day on March 24, 2003, the pond was completely drained and empty. On March 25, 2003, it was noticed that water had accumulated in the pond again, possibly spring water, and

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ERRS used a vacuum truck to pump out the water. ERRS constructed a sump at the west end of the pond to accumulate and drain the water from the pond sediments.

On March 25, 2003, START noticed the emergency light of the treatment system was flashing indicating the pumping mechanism in the manholes was not working. START notified ESC Doug Taylor. Mr. Taylor asked START to shift the pump in the manual mode. START obliged and switched the pump to manual mode, and the pump started pumping water from the manholes again. On March 26, 2003, Mr. Taylor arrived on site to fix the float switch. Mr. Taylor fixed the float switch and asked START to periodically check the system.

On March 27, 2003, a conference call was conducted between START, EPA and ERRS to discuss the fate of the pond sediments. It was decided in the conference call that a containment cell would be constructed on site to hold the excavated sediments. On March 27th and March 28, 2003, START collected GPS data from the areas remediated under the current removal and other site features. START and ERRS departed the site on March 28, 2003.

March 31 through April 05, 2003

START and ERRS mobilized to the site on March 31, 2003. START coordinated with EPA to setup a laboratory to analyze the pond sediment samples. Backfill material (clay), to be used to backfill the excavated pond, was delivered to the site. ERRS continued to maintain the plastic cover on the stockpiles. ERRS began leveling and grading an area in the northwest section of the site to construct the containment cell. The area was graded to facilitate the drainage of the water from the sediments out of the containment cell.

ERRS continued to maintain the silt fences along the banks of Unnamed Tributary #1, sift debris from soil stockpiled on site, maintain site roads, and continued grading, leveling, and discing the southeast area of the site in preparation to revegetate this area. ERRS continued to transport the pond water to the City of Fairmont's sewer manhole located on the northeast side of the site. START continued to measure the pH of the pond water before it was drained into the manhole on a daily basis to ensure that the pH met the criteria in the discharge permit.

On April 02, 2003, RPM Matta, WVDEP Bass, and representatives of United States Geological Survey (USGS), United States Fish and Wildlife Service (USFWS), and TetraTech arrived on site to discuss the Remedial Investigation and Feasibility study (RIFS). All the above mentioned individuals departed the site the same day.

On April 03, 2003, City of Fairmont Fred Roman, ESC Doug Taylor, and Cheyne Gross arrived on site. Mr. Roman collected water samples from the effluent of the PRP's treatment system. ESC representatives changed the filter bags of the treatment system and inspected the manholes

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of the East and Middle tributaries. ESC representatives departed the site the same day. On April 05, 2003 START demobilized from the site.

April 07 through April 12, 2003

Backfill material (clay) continued to be delivered to the site. ERRS continued to maintain the plastic cover on the stockpiles. Due to heavy rain the roads were muddy and covered with slush. ERRS cleared the slush from the site roads and filled the low spots on the road with clean shale material. ERRS continued to pump out the daily precipitation and spring water flow from the pond. A vacuum truck was used to transport the water to the city sewer system manhole. ERRS continued to maintain the silt fences along the banks of Unnamed Tributary #1, sift debris from soil stockpiled on site, maintain site roads, and continued grading, leveling, and disking the eastern area of the site in preparation of revegetating this area.

ERRS continued to construct the containment cell to hold the pond sediments. An auger attached to a skip loader was used to dig the post holes to support the walls of the cell. On April 12, 2003, ERRS completed the construction of the containment cell. The dimensions of the containment cell were 60 x 80 feet. The side walls of the cell were constructed of timber and lined with plastic. The floor of the cell was lined with geo-textile fabric. At the center of the cell, below the geo-textile fabric, a gravel channel was constructed to help divert the infiltrating water out of the containment cell.

On April 12, 2003, a suspected capacitor was discovered in the wooded northwest area of the site. A sample of the capacitor contents was collected by ERRS and field screened for PCBs by START. The field screening test indicated that the capacitor contains PCBs. Therefore, a sample of the capacitor's contents was collected by ERRS and shipped to a laboratory for PCB analysis. The capacitor was transferred to a drum lined with plastic. The area where the capacitor was discovered was marked with caution tape and the location was recorded using a GPS unit..

April 14 through April 19, 2003

ERRS continued to pump out the daily precipitation and stream water flow from the pond. A vacuum truck was used to transport the water to the city sewer system manhole. Backfill material (clay) continued to be delivered to the site. ERRS continued to maintain the silt fences along the banks of Unnamed Tributary #1, maintain site roads, and continued grading, leveling, and disking the east area of the site in preparation of revegetating this area. On April 14, 2003, ERRS began excavating the pond sediments from the east side of the pond and transported the sediments to the containment cell located in the northwest area of the site.

On April 14, 2003, ESC Doug Taylor arrived on site and changed the filter bags of the treatment

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system and inspected the treatment system and the manholes located at the East and Middle Tributaries. Mr. Taylor departed the site the same day. On April 14, 2003, START collected two post excavation sediment samples from the pond. The coordinates of the sample locations were recorded using a GPS unit. The samples were packed and shipped to the designated laboratory for analysis.

On April 16, 2003, ERRS added pelletized limestone to amend the soil in the eastern area of the site. This area was seeded and mulched with hay. On April 17, 2003, START and ERRS demobilized from the site.

April 21 through April 26, 2003

START and ERRS mobilized to the site on April 21, 2003. ERRS continued to pump out the daily precipitation and spring water flow from the pond. A vacuum truck was used to transport the water to the city sewer system manhole. ERRS continued to excavate the pond sediments, loaded the sediments into a dump truck, and transported the sediments to the containment cell located in the northwest area of the site. The sediments were saturated with water and some of the sediments were black in color and had a tar like odor. The contaminated sediments extended approximately 15 feet bgs. As the excavation of the pond proceeded, the excavated areas were backfilled with imported clay material. This technique was utilized so that the contaminated sediments would not flow into the excavated areas and also the backfilled area would provide firm ground for the excavator to work from. An orange safety fence was installed between the bike trail and the pond.

On April 23, 2003, ESC Doug Taylor arrived on site to change the filter bags of the treatment system and inspect the treatment system and the manholes located at the East and Middle Tributaries. Mr. Taylor departed the site the same day.

The depth of the contaminated pond sediments was higher than expected and the containment cell was filled to its capacity warranting the construction of containment cell # 2. The entryway of containment cell # 1 was closed and the side walls were strengthened by placing soil behind the cell walls. On April 24, 2003, ERRS began constructing a second containment cell in the northwest area of the site to stage the additional contaminated sediments from the pond. ERRS received the analytical results from the laboratory for the sample collected from the capacitor containing potential PCBs. The sample results indicated that the capacitor contained a high concentration of Aroclor-1232.

Backfill material (clay) and gravel continued to be delivered to the site. ERRS continued to maintain the silt fences along the banks of Unnamed Tributary # 1, and maintain site roads.

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April 28 through May 03, 2003

ERRS continued to pump out the daily precipitation and spring water flow from the pond. A vacuum truck was used to transport the water to the city sewer system manhole. Accumulated pond water was channeled to a collection area and was pumped out at frequent intervals. ERRS continued to excavate the pond sediments, loaded the sediments into a dump truck, and transported the sediments to the containment cell # 1 located in the northwest area of the site. A temporary holding pit was constructed on the northeast side of the cell to serve as an intermediate unloading area for the trucks transporting the contaminated sediment from the pond. The contaminated sediments were transferred from this pit to the containment cell # 1. A section of the side wall of containment cell # 1 was dislodged and showed structural weakness. ERRS repaired this section and strengthened it by placing additional support material (clay) behind the walls.

ERRS continued to backfill the excavated pond areas with imported clay. START conducted air monitoring at the excavation area in the pond. The instrument readings indicated that the organic vapor concentrations were higher than the action level listed in the health and safety plan. Therefore, START recommended to ERRS that all personnel working in and around the pond use an air purifying respirator.

Backfill material (clay) and gravel continued to be delivered to the site. ERRS continued to construct containment cell # 2; installing fence post, clearing debris, grading and leveling, and constructing gravel drains to drain the infiltrating water from the sediments. The dimensions of the containment cell # 2 were 72 x 108 feet. The side walls of the containment cell were constructed of timber and lined with plastic. ERRS continued to maintain the silt fences along the banks of Unnamed Tributary # 1, clear drains, and maintain site roads.

On April 29, 2003, START collected a post excavation sediment sample from the pond. The sample was collected at a depth of approximately 16 feet bgs. The coordinates of the sample location were obtained by START using a GPS unit. The samples were packed and shipped to the designated laboratory for analysis.

May 05 through May 09, 2003

During this week, heavy rains minimized the excavation efforts of ERRS to remove the contaminated sediments from the pond and other site activities. ERRS continued to pump out the daily precipitation and spring water flow from the pond. A vacuum truck was used to transport the water to the city sewer system manhole. ERRS continued to excavate the pond sediments, loaded the sediments into a dump truck, and transported the sediments to containment cell # 2 located in the northwest area of the site. ERRS continued to maintain the plastic cover on the stockpiles. ERRS continued to maintain the silt fences along the banks of Unnamed

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Tributary #1, and maintain site roads.

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On May 05, 2003, ESC Taylor arrived on site and changed the filter bags of the treatment system and inspected the manholes of the East and Middle Tributaries. Mr. Taylor also collected water samples from the manholes located at the East and Middle Tributaries.

On May 08, 2003, EPA modified the existing ERRS delivery order to extend the performance period to July 25, 2003. This was confirmed by an email from the contracting officer on May 09, 2003. ERRS and START demobilized from the site on May 09, 2003.

May 12 through May 23, 2003

On May 12, 2003, START and ERRS mobilized to the site. Heavy wind and rain during the past few days had caused damage to the check dams upstream of the pond, clogged the onsite ditches and water pipes at various locations on site, and damaged the plastic cover on the stockpiles of contaminated soil. The pond was filled with rain water and water level was back to pre-excavation level. ERRS repaired the check dam and added gravel/clay to strengthen the dam. The stockpiles were covered with plastic and the hay bales pegged to keep the plastic in place were replaced. ERRS cleared the debris from the pipe and improved the surface runoff from the site. ERRS continued to pump out the pond water using a vacuum truck and discharged it to the city sewer system. ERRS continued to excavate the pond sediments, loaded the sediments into a dump truck, and transported the sediments to containment cell # 2 located in the northwest area of the site.

On May 20, 2003, ESC Doug Taylor arrived on site and changed the filter bags of the treatment system and inspected the manholes of the East and Middle Tributaries.

On May 23, 2003, START and ERRS demobilized from the site.

May 27 through June 13, 2003

On May 27, 2003, START and ERRS mobilized to the site. ERRS continued to excavate the pond sediments, loaded the sediments into a dump truck and transported the sediments to containment cell # 2 located in the northwest area of the site. Contaminated sediments in the pond continued to be found at 12 to 15 ft bgs. ERRS pumped freshly accumulated rain water in the pond to the Monongahela River using two 3-inch trash pumps. ERRS also continued to pump out the pond water using a vacuum truck and discharged it to the city sewer system. Backfill material (clay) and gravel continued to be delivered to the site. Imported backfill material was transported to the pond area to backfill the excavated areas. Excavation and backfilling activities in the pond were carried out simultaneously. ERRS continued to maintain the silt fences along the banks of Unnamed Tributary # 1, clear drains, and maintain site roads.

ERRS continued to maintain the containment cells. Sections of the side wall of containment cell # 2 showed structural weakness and these sections were repaired and strengthened by placing

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additional support material (clay) behind the walls. Once the containment cell # 2 was filled to its capacity, ERRS closed the entry way and enclosed the cell. A temporary holding pit was constructed at the east side of the cell to serve as an intermediate unloading area for the trucks transporting the contaminated sediment from the pond. Further excavated contaminated sediments were transported to the temporary holding pits located northeast of containment cell # 1 and east of containment cell # 2. The sediments were later transferred to the containment cells using an excavator.

On May 28, 2003, upon RPM Chris Matta's request, START emailed the sample location map and the associated GPS coordinates table to Mr. Matta, WVDEP Bass, EPA Werner, and West Virginia Department of Health and Human Resources (WVDHHR) Smith. START also mailed the analytical results and associated information related to the contaminated soil stockpiles staged on site to Mr. Friedman (EPA, RCRA) for potential de-listing of the stockpiled waste. On May 28, 2003, ESC's Doug Taylor and their sub-contractor McCutcheon Enterprises, Inc., arrived on site. McCutcheon loaded two-55 gallon poly drums filled with used filter bags from the treatment system and departed site. The drum would be disposed of appropriately by McCutcheon. Mr. Taylor changed the filter bags of the treatment system and inspected the manholes of the East and Middle tributaries.

On June 05, 2003, ESC Doug Taylor arrived on site and changed the filter bags of the treatment system and inspected the manholes of the East and Middle Tributaries. Mr. Taylor departed the site the same day. On June 11, 2003, ESC Cheyne Gross arrived on site and checked the treatment system and inspected the manholes of the East and Middle Tributaries.

On June 12, 2003, chain link fence was delivered to the site. The chain link fence would be installed on the west side of the pond along the road to prevent unauthorized access to the site. On June 13, 2003, START and ERRS demobilized from the site.

June 16 through July 03, 2003

On June 16, 2003, START and ERRS mobilized to the site. ERRS installed the chain link fence with a gate on the east side of the rail-to-trail path. The fence was constructed to prevent potential trespassing of the site. Recent heavy rains had caused extensive damage to Unnamed Tributary #1 and the site roads. ERRS cleared the debris from the drainage pipes along Unnamed Tributary #1 and other locations on site. ERRS graded and leveled the road along Unnamed Tributary #1, installed new silt fences along the banks of the tributary, and maintained site roads. ERRS continued to pump freshly accumulated storm water in the pond to the Monongahela River using two 3-inch trash pumps. ERRS continued to excavate the pond sediments, loaded the sediments into a dump truck and transported the sediments to the containment cells located in the northwest area of the site. ERRS continued to maintain the plastic cover on the stockpiles. Hay bales were pegged on the plastic to hold the plastic in place.

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Hay bales were also placed around the piles to prevent migration of the contaminated soil away from the piles.

ERRS began decontaminating equipment to demobilize the equipment in preparation of site closure. ERRS began demobilizing equipment.

On June 18, 2003, ERRS completed excavation of the contaminated sediments in the pond. The pond was backfilled to its approximate original surface elevation. The slopes of the pond were amended to reflect the original grade, and erosion control mats were spread on the slopes of the pond. On June 18, 2003, representatives from WVDEP, United States Army Corp of Engineers (USACOE), and Kipin visited the site. On June 19, 2003, RPM Matta and representatives from USACOE arrived on site to discuss disposal options for the contaminated soil staged on site.

On June 24, 2003, START collected post excavation sediment samples from the pond. Four sediment samples and a duplicate sediment sample were collected. The samples were collected at a depth of approximately 16 feet bgs. The samples were packed and shipped to the designated laboratory for analysis. The temporary check dams/diversion dams constructed upstream of the pond were breached to revert the water flow through the pond and eventually into the Monongahela River.

On June 28, 2003, ERRS seeded the eastern area of the site near the fence line and other bare areas of the site to control soil erosion.

On June 02, 2003, and July 01, 2003, ESC Taylor arrived on site and changed the filter bags of the treatment system and inspected the manholes of the East and Middle Tributaries. Mr. Taylor departed the site the same day. On July 01, 2003, RPM Chris Matta visited the site. On July 03, 2003, START and ERRS demobilized from the site.

July 07 through July 18, 2003

On July 07, 2003, ERRS mobilized to the site. ERRS continued to demobilize equipment from the site. On July 09, 2003, ESC Taylor and Glen Rieger arrived on site and changed the filter bags of the treatment system and inspected the manholes of the East and Middle Tributaries. Mr. Taylor and Mr. Rieger departed the site the same day.

On July 15, 2003, START transported all the site files from the command post to START's office in Wheeling, WV. The final demobilization of all equipment and ERRS personnel occurred on July 18, 2003.

No further removal action was anticipated under this removal response action. The contaminated soil and sediments staged on site would be disposed of appropriately. EPA's remedial division would evaluate various disposal options and dispose the contaminated soil and

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sediments.

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August 06, 2003

On August 06, 2003, START and EPA conducted video documentation of the site. Removal activities completed under this removal action were documented.

7.0 PROBLEMS ENCOUNTERED AND RECOMMENDATIONS

During the removal operations, new areas of contamination were discovered. The newly discovered contaminated areas continued to pose a threat to public health and ecological receptors on site, surface water tributaries and the Monongahela River. Funds allocated to the removal action were depleted. Therefore, OSC drafted another Action Memo requesting additional funds in order to continue the removal action and to address the newly discovered contamination. On November 01, 2002, the Director of Hazardous Sites Cleanup Division signed a request for additional funding and an exemption of the 12 month and \$2 million statutory limits for a removal action.

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9.0 GLOSSARY OF ABBREVIATIONS AND DEFINITIONS

AOC	Administrative Order on Consent
ARARs	Applicable or Relevant and Appropriate Requirements
BTEX	Benzene, Toluene, Ethylbenzene and Xylene
BGS	Below Ground Surface
BOD	Biological Oxygen Demand
BTU	British Thermal Unit
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CLP	Contract Laboratory Procedure
COC	Contaminants of Concern
CP	Command Post
CRES	CERCLA Removal Enforcement Section
CST	Client Services Team
CY	Cubic Yards
DOT	Department of Transportation
E&E	Ecology and Environment Inc.
EPA	Environmental Protection Agency
ERCS	Emergency Response Cleanup Services
ERG	Emergency Removal Guideline
ERRS	Emergency and Rapid Response Services
ERT	Emergency Response Team
ESC	Environmental Strategies Corporation
FAO	Financial Administrative Officer
GC	Gas Chromatograph
GES	Guardian Environmental Services
GPS	Geographical Positioning System
Haz-Cat	Hazardous Categorization
ICP	Inductively Coupled Plasma
LBS	Pounds
LDB	Lower Descending Bank
LEL	Lower Explosive Limits
MDL	Method Detection Limit
MSL	Mean Sea Level
MS	Matrix Spike
MSD	Matrix Spike Duplicate
NA	Not Applicable

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NCP	National Oil and Hazardous Substance Pollution Contingency Plan
ND	Not Detected at a concentration greater than the MDL
NH	Non hazardous
NOV	Notice Of Violation
NPL	National Priority List
NR	Non Regulated
OSC	On-Scene Coordinator
PAH	Polycyclic Aromatic Hydrocarbons
PCB	Polychlorinated biphenyls
PID	Photo Ionization Detector
POTW	Publically Owned Treatment Works
PPB	Parts Per Billion
PPE	Personal Protective Equipment
PPM	Parts Per Million
PRP	Potentially Responsible Party (ies)
RA	EPA Regional Administrator
RAP	Removal Action Plan
RCRA	Resource Conservation and Recovery Act
RI/FS	Remedial Investigation and Feasibility Study
RM	Response Manager
RPM	Remedial Project Manager
SARA	Superfund Amendment and Reauthorization Act
SATA	Site Assessment and Technical Assistance
SDG	Sample Delivery Group
SI	Site Inspection
SSP	Site Sampling Plan
START	Superfund Technical <i>Assessment and Response</i> Team
TAL	Total Analyte List
TAT	Technical Assistance Team
TCL	Total Compound List
TCLP	Toxicity Characteristic Leachate Procedure
TOC	Total Organic Carbon
UAO	Unilateral Administrative Order
USACOE	U.S. Army Corps of Engineers
USCG	United States Coast Guard
VOC	Volatile Organic Compound
WEC	Westinghouse Electric Corporation
WVDEP	West Virginia Department of Environmental Protection
WVDH	West Virginia Department of Health

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WVDNR	West Virginia Department of Natural Resources
WVSWC	West Virginia State Water Commission
XRF	X-Ray Fluorescence