

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
POLLUTION REPORT**

I. HEADING

DATE: August 11, 2000

SUBJECT: **POLREP for the Valleycrest (North Sanitary) Landfill Site, Dayton, Montgomery County, Ohio.**

FROM: Steve Renninger, OSC, USEPA, Region 5 ERB, Cincinnati, OH

TO: K. Mould, USEPA, OSWER, Washington D.C (mould.kevin@epa.gov)
 R. Karl, USEPA, ERB Chief, Chicago, IL (karl.richard@epa.gov)
 J. El-Zein, USEPA, Chief, RS-1, Grosse Ile, MI (el-zein.jason@epa.gov)
 C. Ropski, USEPA, ESS, Chicago, IL (ropski.carol@epa.gov)
 L. Rosales, USEPA, Office of Public Affairs, Chicago, IL (rosales.leo@epa.gov)
 C. Kawakami, USEPA, ORC, Chicago, IL (kawakami.cynthia@epa.gov)
 G. Powell, USEPA, ERT, Cincinnati, OH (powell.greg@epa.gov)
 D. Mickunas, USEPA, ERT, Edison, NJ (mickunas.dave@epa.gov)
 T. Williams, USEPA, RPM, Chicago, IL (williams.thomas@epa.gov)
 M. Laur, USEPA, ORD, RTP, NC (laur.michele@epa.gov)
 M. Simon, USEPA, ORD, Cincinnati, OH (simon.michelle@epa.gov)
 J. Crawford, Ohio EPA OSC, Dayton, OH (jim.crawford@epa.state.oh.us)
 K. Kollar, Ohio EPA OSC, Dayton, OH (kurt.kollar@epa.state.oh.us)
 S. Shane, Ohio EPA, DERR, Columbus, OH (scott.shane@epa.state.oh.us)
 K. Clouse, Ohio EPA, DERR, Columbus, OH (kevin.clouse@epa.state.oh.us)
 R. Frey, Ohio Department of Health, Columbus, OH (rfrey@gw.odh.state.oh.us)
 B. Ring, Coord., Dayton Regional Hazmat Team, Dayton, OH (hazdude@aol.com)
 P. Alexander, Dist Chief, Dayton Fire Dept, Hazmat Supervisor (937) 443-4664
 T. Wilson, Regional Air Pollution Control, Dayton, OH (937) 225-3486
 D. Alig, Fire Chief, Riverside Fire Department, Dayton, OH (937) 252-8052

POLREP #: POLREP #14 with attached photographs of: (1) view of a tanker truck pumping out a storage tank containing vinyl chloride-containing water; (2) view of VDRAG contractors excavating in Row 11; (3) view of a submerged intact drum in ponded water located in Row 9; (4) Drum Excavation Grid Table.

II. BACKGROUND

Site Number	B543
Response Authority	CERCLA Time Critical Removal, PRP Removal
NPL Status	NPL listed 1994, Currently in RI phase with Ohio EPA
Latitude	39/47'14" North
Longitude	84/09'08" West
State Notification	Ohio EPA notified - RI/FS concurrent
Start Date	June 23, 1998 (Landfill Gas Abatement System) November 11, 1998 (Drum Removal)
Completion Date	To be determined

III. SITE INFORMATION

A. Incident Category

CERCLA incident category: PRP Time Critical Removal at an NPL site

B. Site Description

1. Site location and background

See previous POLREPS.

IV. REMOVAL INFORMATION

A. Situation

1. Current situation

Pursuant to a USEPA Administrative Order by Consent (AOC) dated on September 10, 1998, Valleycrest Drum Removal Action Group (VDRAG) contractors initiated work on a landfill gas (LFG) abatement system in June, 1998. Six perimeter LFG extraction systems have been installed and manifolded into an enclosed flare. VDRAG contractors initiated a drum removal in Disposal Area 5 in November, 1998. To date, 14,835 drums have been removed from Disposal Area 5 (west side of site), which represents approximately 55% of Disposal Area 5.

2. Removal activities to date (since last POLREP)

- During the month of June 2000, VDRAG contractors completed the excavation of Row 10 to a depth of 13 feet below ground surface. VDRAG contractors initiated Row 11 excavation. VDRAG contractors completed transporting all TCE/PCB-contaminated soil/debris from stockpile #4 for disposal. VDRAG contractors completed sampling stockpiled excavated soil/debris from Rows 10 and 11 in staging pad #7. Five samples out of the 42 samples (or cells equaling 150 yd³) collected from staging pad #7 showed elevated levels of TCLP TCE and PCBs; 23 of 42 cells showed elevated levels of TCLP TCE; and 14 of 42 cells showed no elevated TCLP or PCB exceedences. Post excavation sampling in grids where the concrete obstruction was located in Rows 7 through 9 showed no elevated TCLP or PCB parameters. VDRAG contractors initiated backfilling procedures in Rows 7 through 9. Clean fill material was backfilled to a depth of 750.00 feet and the remaining filled with non-contaminated soil/debris with a one-foot clean fill cap to the ground surface. On June 26th, Ohio EPA approved the RI workplan. Analytical results from a USEPA-split liquid composite drum sample revealed TCE at 11,200 ppm. Analytical results from a USEPA-split solid composite drum samples revealed the following: TCLP benzene at 1.6 and 1.5 ppm (limit of 0.5 ppm); TCLP MEK at 470 ppm (limit of 200.0 ppm); TCLP TCE at 15 and 2.7 ppm (limit of 0.5 ppm); TCLP PCE at 1.6 ppm (limit of 0.7 ppm); and TCLP vinyl chloride at 1.3 ppm (limit of 0.2 ppm).

The enclosed flare combustor is operating 2 hours 'on' and 4 hours 'off'. Compliance probe CP4-C was out of compliance early in the month (methane at 7%). The flare is being operated between 155 and 170 cfm. START and U.S. EPA checked the vacuum pressure around the system. The vacuum pressure at the flare was around 1.3 and 1.4 inches of water. Vacuum pressure at GV4-b was 0.06 inches of water. SCS stated that the vacuum pressure would be adjusted to increase the pressure in those areas. All compliance probes remained in compliance the rest of the month.

A total of twelve roll-off boxes containing 1,327 shredded, excavated drums and respective contents were transported for off-site disposal to EQ's, Wayne Disposal Landfill, in Belleville, Michigan. A total of 34,300 gallons of non-hazardous wastewater was transported to Perma-Fix, in Dayton, Ohio, for treatment and disposal. A total of fifteen roll-off boxes (300 cubic yards) containing soil/debris contaminated with PCBs and TCE were transported to ChemWaste Management, in Model City, New York, for disposal.

- During the month of July 2000, VDRAG contractors completed backfilling Rows 7 through 9. VDRAG contractors initiated the construction of 6 more soil/debris stockpile staging pads. Three will be in Area 5 and 3 more in Area 1. VDRAG contractors continued to transport TCE/PCB-contaminated debris from soil/debris stockpile #7 for disposal. Contractors from the City of Dayton began installing monitoring and rotonomic wells in the northwestern perimeter of Area 5. Five of the eight wells were installed and developed. START split samples with the contractor at each of the five wells. VOCs, SVOCs, and metals were analyzed for each well. VDRAG contractors moved the command post to 950 Brandt Pike. Perimeter air monitoring utilizing the Voyager units did not show any elevated levels of VOCs. Staging pad #4 was filled with TCE-contaminated soil/debris from stockpile #7 and covered with a 16-mm poly liner.

VDRAG contractor operating the enclosed flare 2 hours 'on' and 4 hours 'off' in the beginning of the month and 2 hours 40 minutes 'on' and 5 hours 20 minutes 'off' toward the end of the month. The flare is being operated between 150 and 170 cfm. All compliance probes remain in compliance (less than 5% methane). U.S. EPA received the final stack testing report from the VLSG.

A total of four roll-off boxes containing 484 shredded, excavated drums and respective contents were transported for off-site disposal to EQ's, Wayne Disposal Landfill, in Belleville, Michigan. A total of 9,000 gallons of hazardous wastewater was transported to Perma-Fix, in Dayton, Ohio, for treatment and disposal. A total of 48,000 gallons of non-hazardous wastewater was transported to Perma-Fix, in Dayton, Ohio, for treatment and disposal. A total of 39 roll-off boxes (780 cubic yards) containing soil/debris contaminated with PCBs and TCE were transported to ChemWaste Management, in Model City, New York, for disposal. A total of 2 roll-off boxes containing 121 shredded, excavated drums and respective contents contaminated with TCE and PCBs were transported to ChemWaste Management, in Model City, New York, for disposal.

B. Next Steps

- SCS Engineers to continue operation of the enclosed flare landfill gas system. All LFG system vents and piping have been manifolded into the enclosed flare.
- Continue off-site disposal of bulked drums containing solid and liquid hazardous waste.
- Collect perimeter groundwater well samples from the City of Dayton. Samples to be analyzed for VOCs, SVOCs, and metals.
- Split Ohio EPA perimeter groundwater well samples. Samples to be analyzed for VOCs.
- Conduct full excavation to the limit of waste from Area 5 grids in Rows 10 and 11.
- Conduct a meeting with USEPA and VDRAG to discuss on-site treatability options and to present the data from the vapor extraction treatability study. Bench-scale vapor extraction testing was conducted by CRA.
- Continue weekly update meetings with local agencies every Wednesday at 1300 hours.

C. Key Issues

- A total of 14,835 drums have been removed to date from 45 out of 82 (55%) 50' by 50' grids in Disposal Area 5. Of those drums excavated, 1,382 were excavated from Rows 2 through 6, and 13,453 were excavated from Rows 7 through 11.
- Subsurface drum wastestreams are potentially impacting local groundwater near City of Dayton well fields.
- A meeting between USEPA and VDRAG management, lawyers, and technical personnel was conducted on May 11, 2000, in Chicago, Illinois, to discuss removal activities at the site.

V. **COST INFORMATION** (estimated as of August 2, 2000)

Personnel	Budget	Used to Date	Remaining
START (TDD #S05-9806-005)	\$225,000	\$186,626	\$ 38,374
USEPA	\$150,000	\$135,000	\$ 25,000
TOTALS	\$375,000	\$321,626	\$ 63,374

VI. **DRUM INFORMATION**

- See attached Disposal Area 5 - Drum Excavation Grid Table.

VII. DISPOSAL INFORMATION (as of July 29, 2000)

Wastestream	Quantity	Containment Migration Control	Disposal Option	Disposal Facility
Bulked solid drummed waste	115 roll-off boxes (13,119 drums)	N/A	Microencapsulation	Environmental Quality Belleville, Michigan.
TCE-contaminated solid/debris	290 roll-off boxes (5,800 cubic yards)	N/A	Microencapsulation	Environmental Quality Belleville, Michigan.
PCB-contaminated soil/debris	13 roll-off boxes (260 cubic yards)	N/A	Incineration	ChemWaste Management Port Arthur, Texas.
PCB solids PCB liquid	2 roll-off boxes (bulked 131 drums) 1 drums (55 gal.)	N/A	Incineration	ChemWaste Management Port Arthur, Texas.
PCB/TCE-contaminated soil/debris	120 roll-off boxes (2,400 cubic yards)	N/A	Landfill	ChemWaste Management Model City, New York.
TCLP lead-contaminated soil/debris	9 roll-off boxes (180 cubic yards)	N/A	Landfill	Environmental Quality Belleville, Michigan.
Hazardous liquid	108,479 gallons	N/A	Treatment	ChemWaste Management Sauget, Illinois. ChemWaste Management Port Arthur, Texas. Perma-Fix Dayton, Ohio.
Sulfide drums	14 drums	N/A	Treatment	City Environmental Detroit, Michigan.
TCE/ignitable solids TCE/ignitable solids	1 roll-off box (bulked 150 drums) 45 drums	N/A	Landfill	ChemWaste Management Sauget, Illinois.
Non-hazardous water	304,017 gallons	N/A	Treatment	City Environmental Detroit, Michigan. Perma-Fix Dayton, Ohio.
PCB/TCE-contaminated solids	6 roll-off boxes (bulked 613 drums)	N/A	Landfill	ChemWaste Management Model City, New York.