UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

SUBJECT: Referral to National Priority List and Additional Site Evaluation
Peck Iron and Metal Site, Portsmouth, Virginia

FROM: Richard Rupert, On-Scene Coordinator May 5, 2009
Eastern Removal Response Section (3HS31)

THROUGH: Gerald T. Heston, Chief
Eastern Response Section (3HS31)

TO: Dennis P. Carney, Associate Director
Office of Preparedness and Response (3HS30)

In October 2006, an Action Memorandum requesting authority to conduct a removal action at the Peck Iron and Metals Site (the Site) was signed. Since that time, several significant developments have occurred, including a unilateral order requiring assessment of the Site.

The Site is a former scrap metal facility located in a mix of industrial and residential areas partially bordered by wetlands and a tributary to Chesapeake Bay. The Site is contaminated with numerous hazardous substances, with the foremost being polychlorinated biphenyls (PCBs) and lead. Human health, welfare and the environment are threatened by the release of hazardous substances in contaminated debris, soil and sediment.

The required assessment, though incomplete, provided a more thorough understanding of the Site conditions. That assessment clarified the magnitude and extent of the contamination. The Site, some 30 acres, is nearly all contaminated to a degree, and given what is known at this time, requires remediation. Additionally, sediments on the adjacent shoreline have shown significant heavy metal contamination including arsenic, cadmium, chromium, nickel, lead, mercury and silver. Groundwater also was discovered to be impacted with the same metals and PCBs. This degree of contamination was unknown at the time the October 2006 Action Memorandum was drafted and is more serious than initially understood. The estimated cost to conduct an appropriate removal action will now exceed the original estimate of 5.7 million dollars and could exceed 20 million dollars according to the Extent of Contamination assessment of the Site. Additionally, it would likely exceed a year to fully implement.

The Site currently is being proposed for the National Priority List (NPL). To assure no significant migration of hazardous substances from the Site, while it awaits cleanup, the Site was assessed in its current condition. This assessment found that current conditions appear to be reasonably stable, and barring a major storm event, erosion, groundwater transport and other migration vectors appears to be at tolerable limits given the expected time until the NPL process will provide a final remedy. Various alternatives were developed that could stabilize, and further limit migration of contaminants off of the Site. Three alternatives were identified and consisted of covering the most contaminated area (approximately 12 acres) adjacent to the shore with either (1) clay or (2) a synthetic membrane, or (3) closely monitoring the Site to provide advance knowledge of changing Site conditions, which would threaten a significant release. Both of the alternatives that provide covering the subject area require significant removal of construction debris and site preparation and are estimated at about 2 million dollars in contractor costs and with additional EPA expenses included, would likely approach 4 million dollars. Surveillance, including groundwater monitoring, for three years is estimated to cost about $40,000. Although an initial assessment has been provided to EPA, EPA has determined that it requires additional information at this time regarding the release or threat of release, and therefore, is permitted to conduct these site evaluation activities pursuant to section 104(b) of CERCLA, 42 U.S.C. § 9604(b) and Section 300.410 of the NCP, 40 C.F.R. § 300.410.

Given the complexities and great expense of covering the subject area described above, and that any final remedy selected during the remedial process is expected to require significant removal of PCB-contaminated soils (requiring the interim cover to be removed and likely disposed due to contamination of the materials), covering this area would not be consistent with the final remedy. In addition, the Remedial program may wish to consider the feasibility of temporary stabilization measures to minimize the migration of contaminants and protect against erosion from the Site in the event of a significant storm event. The Removal Program will continue to coordinate with the Remedial Program in that regard. Therefore, for the removal action, regular monitoring and surveillance of the Site is proposed as the preferred alternative at this time to determine the migration of contamination and the immediate threat of release from erosion. Should this surveillance indicate unacceptable levels contaminant migration or the threat of significant release, immediate action may be taken to further stabilize or remediate the Site. Please indicate your approval or disapproval with the proposed actions by signing below.

Approved Dennis P Carney Date 5/7/09

Disapproved _____ Date _____