

**FIFTH PROGRESS REPORT
NORFOLK SOUTHERN RAILWAY COMPANY
OLD ATHENS TURNPIKE LEAD SITE
OLD ATHENS ROAD
PRINCETON, WEST VIRGINIA
NSRC FILE NO. SA08-253-001**

October 1, 2009

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1.0 INTRODUCTION

This Progress Report was prepared on behalf of Norfolk Southern Railway Company (NSRC) by Marshall Miller & Associates (MM&A). The Progress Report describes response actions in accordance with Section 8.7 of the Administrative Settlement and Order on Consent for Removal Response Action, hereafter referred to as the Settlement Agreement (SA), between the United States Environmental Protection Agency (USEPA) and NSRC. The effective date of the SA was July 2, 2009. Response actions are being performed in the Old Athens Turnpike right-of-way in accordance with the Response Action Plan (RAP) submitted to USEPA on July 6, 2009, as amended on July 16, 2009. NSRC received USEPA's July 29, 2009 approval of the RAP, as well as notification of access to the portion of the Site not owned by NSRC, on July 31, 2009. In accordance with the SA, NSRC commenced on-site implementation of the RAP on August 5, 2009, within seven business days of receipt of the RAP approval and access notification. NSRC submitted the First Progress Report on August 6, 2009, the Second Progress Report on August 20, 2009, the Third Progress Report on September 3, 2009, and the Fourth Progress Report on September 17, 2009, each providing information on activities performed during the fourteen days following the respective prior progress report. In accordance with the SA, this Fifth Progress Report provides information on activities performed during the fourteen days following the Fourth Progress Report.

The Old Athens Turnpike right-of-way (hereafter referred to as the R-O-W) is located in Princeton, Mercer County, West Virginia. For purposes of the RAP, the Site consists of (1) a portion of the R-O-W (approximately 50 feet wide by 300 feet long) adjacent to the former salvage facility (referred to herein as the S.S. Belcher property) that was operated by S.S. Belcher & Company (S.S. Belcher) on NSRC property, and (2) a small overwash area (approximately 30 feet wide by 50 feet long) located on NSRC's property formerly leased to S.S. Belcher. NSRC owns Parcel Number 9 in Princeton, Mercer County, West Virginia, which extends southwestward to the centerline of the former R-O-W. Access to the portion of the Site not owned by NSRC was granted to USEPA by a warrant issued on July 23, 2009. USEPA notified NSRC of the issuance of the warrant granting NSRC access, as

USEPA's agent for that purpose, by letter dated July 29, 2009. Lead-impacted surface soil is being assessed and remediated at the R-O-W in accordance with the approved RAP.

2.0 RESPONSE ACTIONS COMPLETED DURING REPORTING PERIOD

In accordance with the SA and RAP, MM&A has completed the following activities during this reporting period:

1. Maintained high visibility security fencing and keep out signs installed at the R-O-W to deter access by persons not conducting or overseeing the response actions, to preclude interference with the performance of the response activities and to provide for safety of the public during non-working hours.
2. MM&A validated and released laboratory analytical results for five split soil samples from the 87 XRF samples collected from the R-O-W on August 6, 2009.
3. To ensure continued compliance with Item 7 of Section 2.1 of the RAP, an extension of the temporary hazardous waste generator number (WVP000003957) was requested and granted by the WVDEP for the Old Athens Turnpike Site.
4. After reviewing the results of the prior sampling, additional x-ray fluorescence (XRF) surveying was conducted to delineate the extent of total lead concentrations in the R-O-W before excavation commences. On September 24, 2009, 12 soil samples were collected from four hand auger borings (G-27, G-29, G-33 and G-34). G-27 is located 25 feet northeast of G-25 and G-29 is located 50 feet northeast of G-25 (**Map 1, Appendix A**). G-33 is located 14.5 feet southwest of G-1 and G-34 is located 10 feet southeast of G-2. Both G-33 and G-34 are located adjacent to pavement. In-situ XRF analytical results indicate that lead impact above 400 mg/kg does not extend past the established grids.
5. On September 25, 2009, silt fencing was installed to prevent the migration of soil during excavation activities and the boundary of soils above 400 mg/kg was marked on the ground surface.

3.0 PROBLEMS ENCOUNTERED OR ANTICIPATED

None.

4.0 ACTIONS TO PREVENT OR MITIGATE PROBLEMS

None.

5.0 SCHEDULE FOR COMPLETING PROBLEM MITIGATION

None.

6.0 COPIES OF ANALYTICAL DATA

No new analytical data was received.

7.0 RESPONSE ACTION PLAN MODIFICATIONS

No modifications were made to the response action, the RAP or the schedule.

8.0 REMEDIAL ACTIONS OVER NEXT FOURTEEN DAYS

The following response actions are anticipated to be completed in the next fourteen days in accordance with the schedule included in the RAP:

1. Gravel will be spread in Grids 1 and 3 to provide a loading area within the excavation footprint. The gravel surface provides a stable and clean surface upon which trucks can be loaded. If needed, the truck tires can be sprayed or otherwise cleaned while on the gravel surface within the excavation footprint. An exclusion zone (EZ) will be established around the perimeter of the excavation footprint. A contaminant reduction zone (CRZ) will be set up at the southwestern end of the R-O-W. The ground surface of the CRZ will be covered with polyethylene sheeting and containment for decontamination, if needed, will be placed on the sheeting. Workers will enter and leave the EZ through the CRZ where they will doff personal protective equipment and decontaminate equipment, if necessary.
2. Approximately 580 yd³ of lead-impacted soil and debris (battery casings) will be excavated and transported off-site as hazardous waste by U.S. Bulk Transportation, Inc. The waste will be transported to the Max Environmental Technologies, Inc. facility (Max Environmental) for recycling/disposal. Max Environmental is located at 233 Max Lane in Yukon, Pennsylvania. Max Environmental operates under Permit PAD004835146.
3. Soil and debris in excess of the cleanup goal in close vicinity of large tree roots or boulders will be removed using hand tools (shovels, trowels). Soil and debris in excess of the cleanup goal very close to large tree roots or boulders that cannot be effectively removed will be covered with clean material and graded.
4. Post-excavation confirmation soil samples will be collected and analyzed for total lead. Confirmation sampling of soil will consist of establishing a sampling grid system using 625 ft² (25 ft by 25 ft) grid squares across the excavated area and

conducting in situ XRF screening of soil at the center and nodes of each 625 ft² grid square. One prepared XRF sample will be collected from the location having the highest in situ screening reading within each 625 ft² grid square. Where screening results are within 60 percent of the cleanup goal of 400 mg/kg (≥ 240 mg/kg), a soil sample will be collected and submitted to Lancaster Laboratories for analysis of total lead in accordance with USEPA Method 6010C. Although XRF protocol according to USEPA Method 6200 requires that five percent (1:20) of prepared XRF samples be submitted for laboratory analysis, at least 10 percent (1:10) of prepared XRF confirmation samples will be submitted for laboratory analysis of total lead using USEPA Method 6010C. In the event that XRF analysis and laboratory analysis conflict, laboratory analytical results will be utilized.

Appendix A
Map

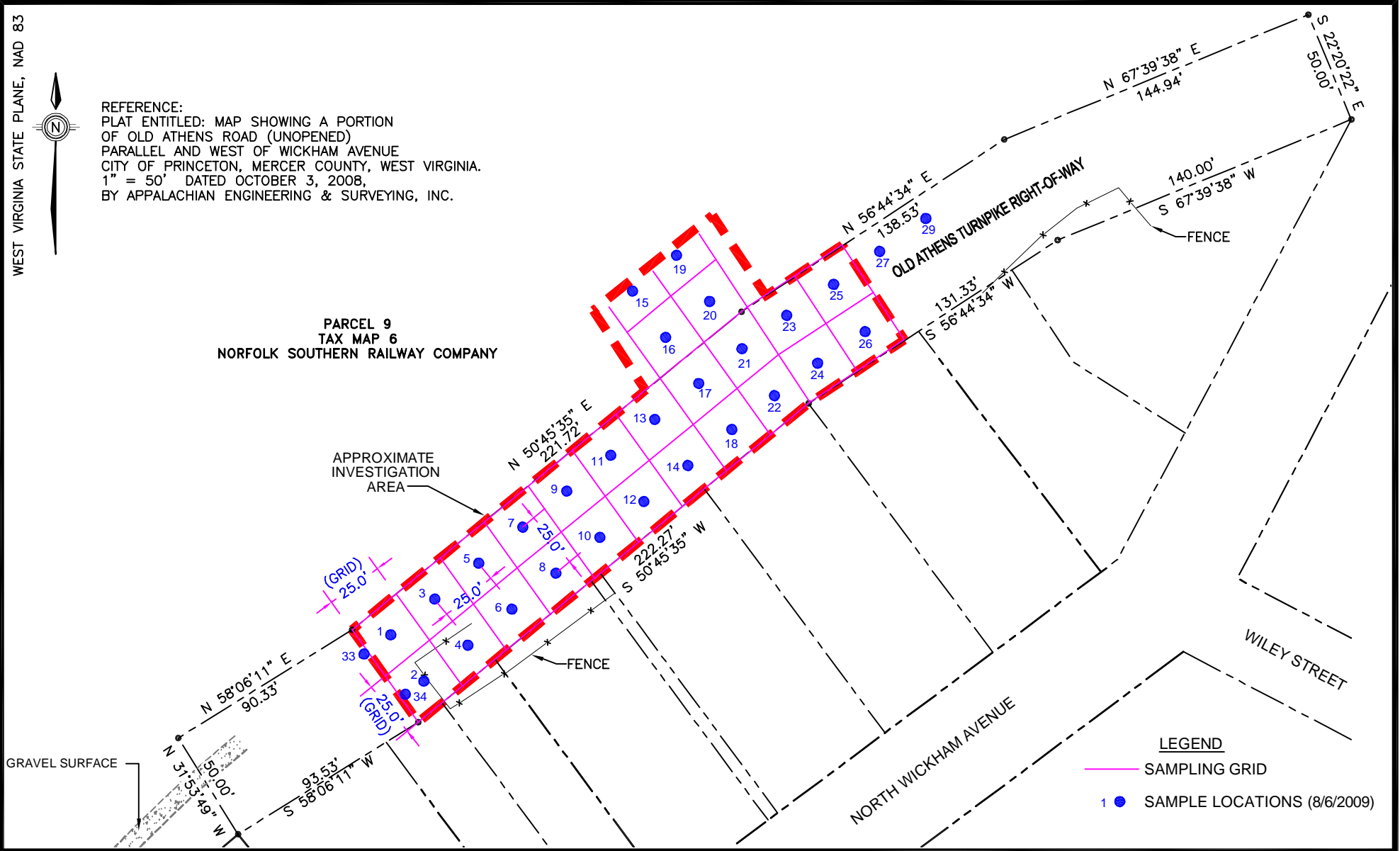


REFERENCE:
PLAT ENTITLED: MAP SHOWING A PORTION
OF OLD ATHENS ROAD (UNOPENED)
PARALLEL AND WEST OF WICKHAM AVENUE
CITY OF PRINCETON, MERCER COUNTY, WEST VIRGINIA.
1" = 50' DATED OCTOBER 3, 2008,
BY APPALACHIAN ENGINEERING & SURVEYING, INC.

PARCEL 9
TAX MAP 6
NORFOLK SOUTHERN RAILWAY COMPANY

APPROXIMATE
INVESTIGATION
AREA

GRAVEL SURFACE



LEGEND
— SAMPLING GRID
● SAMPLE LOCATIONS (8/6/2009)

MAP 1 - SAMPLE LOCATIONS OLD ATHENS TURNPIKE PRINCETON, WEST VIRGINIA

DATE: *SEPTEMBER 2009*
SCALE: *1"=60'*
DRAWN: *DJD*
CHECKED: *GR*
PROJ. #: *NS1691*

