United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Monday, May 11, 2009
From: Steven Renninger

To: Mila Bensing, EPA 5

Subject: Initial POLREP
Rose Exterminator Site
5421 Carthage Avenue, Norwood, OH
Latitude: 39.1048300
Longitude: -84.2733900

POLREP No.:	1	**Site #:**	B5QY
Reporting Period:	April 29 through May 11, 2009	**D.O. #:**	0025
Start Date:	4/29/2009	**Response Authority:**	CERCLA
Mob Date:	4/29/2009	**Response Type:**	Time-Critical
Demob Date:		**NPL Status:**	Non NPL
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:	OHN 000 510 327	**Contract #**	EP-S5-08-02
RCRIS ID #:			

Site Description

The Site is located at 5421 Carthage Avenue, Norwood, Hamilton County, Ohio. The site consists of a 0.055-acre parcel located in a primarily mixed land use area that includes commercial and residential properties. The site is bounded by a former automobile repair garage and restaurant to the north; Carthage Avenue to the east; a residence to the south; and residences to the west. One vacant cinder-block building is located at the Site approximately 100 feet from Carthage Avenue. The building measures approximately 35 by 25 feet, has 9-foot-tall cinder-block walls, and a collapsed roof. The building structure is damaged. Debris including concrete blocks, wood beams, toys, vegetation, and trash is scattered inside the building, which contains evidence of trespassing. White staining (arsenic contamination) is visible on the inside walls of the building.

The Site has been vacant since 1974. According to the City of Norwood, approximately 65 years ago, the founder of the Rose Exterminator Company (a local exterminating company) used the building for small-scale production of a rodenticide containing arsenic. According to Site records, the product was mixed and packaged in the building until the 1940s. The company ceased operations in 1974, and the building has remained unoccupied since.

The Norwood Health Department (NHD) conducted a site investigation on April 29, 1974, with assistance from the National Institute for Occupational Safety and Health (NIOSH). Based on available documentation, samples were collected and analyzed for arsenic only. NIOSH personnel sampled the building rafter wood and collected wipe grab samples from the floor, walls, and other surfaces in the building. Sample results indicated elevated arsenic concentrations, prompting the submittal of a letter dated 1974 to the Rose Exterminator Company requesting the proper cleanup and decontamination of the building. NHD continued to conduct site inspections in 1977, 1978, and 1980, with no apparent response from the Rose Exterminator Company.

A new owner acquired the Site property in 1981 and expressed an interest in demolishing the Site building. NHD contacted the new owner regarding past contamination and recommended decontamination before building demolition. In 1981, NIOSH completed a health hazard evaluation report in response to an NHD request to determine the extent of arsenic contamination in the building. A total of 14 dust wipe samples were collected from various surfaces in the building. Sample results indicated arsenic contents as high as 41 percent and laboratory analytical results ranging from 1.4 to 2,100 micrograms per square inch. NIOSH recommended the decontamination and demolition of the Site building. In September 1982, the property owner received a permit to decontaminate and demolish the Site building. No further correspondence is available until September 2004, when an NHD Nuisance Investigation Report was initiated.

On September 14, 2004, NHD conducted a site inspection. NHD observations include an old oil tank at

the rear of the Site and a large dumping area containing dirt, concrete, and asphalt.
In a report dated June 25, 2008, Tetra Tech EM Inc. (Tetra Tech) completed a Phase I environmental site assessment (ESA) at the Site. The Ohio Environmental Protection Agency (Ohio EPA) Division of Emergency and Remedial Response tasked Tetra Tech to perform the Phase I ESA of the vacant building.

In a letter dated January 29, 2009, the Ohio EPA requested U.S. EPA assistance in conducting a removal site evaluation and potential time-critical removal action at the Site due to elevated arsenic and lead concentrations.

On December 30, 2008, U.S. EPA conducted a site assessment to document Site conditions and evaluate the Site for a time-critical removal action. During the site assessment, U.S. EPA documented total arsenic and total lead concentrations high as 73,101 and 1,795 milligrams per kilogram (mg/kg), respectively, in Site surface soils. Inside wall screening results indicated total arsenic at concentrations as high as 2,529 mg/kg.
U.S. EPA on-site soil samples contained total arsenic concentrations of 68,800, 45,300, 17,800 and 2,980 mg/kg, respectively, and Sample No. S-4 contained a total lead concentration of 1,420 mg/kg, which exceed the Ohio Department of Health (ODH) residential arsenic action level of 20 mg/kg and the ODH residential lead action level of 400 mg/kg.

On April 17, 2009, the ODH completed a Health Consultation for the Rose Exerterminator Site. The Health Consultation concluded: The unsecured Rose Exterminator Site is highly contaminated with arsenic. At present, the site poses a public health hazard.

The ODH Health Consultation recommended the following:

1. Additional soil samples should be collected on-site and from adjacent residences to fully define the extent of arsenic and lead contamination.
2. Access to the property should be restricted to prevent exposure to contaminated building and soils.
3. Future exposure to arsenic and lead contamination at the site can be eliminated by removing the arsenic-contaminated buildng and contaminated soils from the site.

In April, 2009, the City of Norwood posted the site and secured the building door. U.S. EPA and the City of Norwood completed a Site Emergency Contingency Plan in April, 2009.

Current Activities
On January 22, 2009, U.S. EPA met with representatives from the City of Norwood and Ohio EPA to discuss the history of the abandoned building and the pending removal action.

On February 26, 2009, U.S. EPA met with representatives from the City of Norwood and Ohio EPA to discuss a draft Emergency Contingency Plan.

On April 29, 2009, U.S. EPA met with START and ERRS contractors to discuss transportation and disposal options for wastes, health and safety (H&S) issues and upcoming removal activities. ERRS began preparing the H&S plan. A Command Post was established at 5419 Carthage Avenue, adjacent to the site.

On May 1, 2009, U.S. EPA met with representatives for the City of Norwood (Joe Chafflant and Mark Reeves) and START at the Site to outline the upcoming removal action, distribute the finalized Site Emergency Contingency Plan, discuss the perimeter air monitoring strategy during excavation activities and to explain that all of the vegetation surrounding the abandoned building would be removed and chipped starting the week of the May 4, 2009.

Week of May 4, 2009: Large trees removed from arond the site building to prepare for removal of contaminated site building and soil. Health & Safety Plan completed. Perimeter air sample plan completed and access agreements signed by surrounding property owners. U.S. EPA will conduct air sampling and soil sampling in four adjacent residential yards.

May 11, 2009: Perimeter air sampling initiated by START. Off-Shift site security initiated. Excavation of contaminated soil and building demolition initiated.

Planned Removal Actions
Continue off-shift site security.
Continue perimeter air monitoring during excavation.
Continue excavation of arsenic contaminated soil and building demolition.

Initiate off-site disposal of contaminated waste on May 12, 2009.

Next Steps

Continue off-shift site security.
Continue perimeter air monitoring during excavation.
Continue excavation of arsenic contaminated soil and building demolition.
Initiate off-site disposal of contaminated waste on May 12, 2009.

Key Issues

Arsenic contaminated soil and building materials will be removed and transported off-site for proper disposal.

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