# United States Environmental Protection Agency Region III POLLUTION REPORT

Date: Friday, March 18, 2011

From: Myles Bartos, On-Scene Coordinator

To: Donald Berger, Springfield Township Jennie Saxe, EPA

Subject: March 12-19

Tank Car Corporation of America

int. of Walnut Avenue and Oreland Mills Rd, Oreland, PA

Latitude: 40.1200000 Longitude: -75.1919000

POLREP No.: 40 Site #: A3GX

**Reporting Period:** March 12-19 **D.O.** #:

Start Date:1/29/2007Response Authority:CERCLAMob Date:4/30/2007Response Type:Time-CriticalDemob Date:NPL Status:Non NPLCompletion Date:Incident Category:Removal Action

CERCLIS ID #: Contract #

RCRIS ID #:

### **Site Description**

See previous POLREPS for Site description information.

A summary of the removal site evaluation (characterization) conducted is contained in the document "Summary of Removal Site Evaluation Analytical Data", dated February 2, 2010, posted to the web at www.epaosc.org/tcca. In general, the Site contains inorganic and organic contamination of soil (primarily sandblasting grit) and shallow underground water (contaminated by former lagoon contents and tank releases). Additionally, the Site's ground water and surface water exiting the TCCA property contains detectable concentrations of Site-related contamination. Finally, samples collected from residential properties adjacent to the Site and from dirt alongside the roadways leading from the Site contain detectable concentrations of inorganic and/or organic contaminants attributable to the Site.

The TCCA Site contains a large amount of sandblasting grit contaminated by inorganic contamination (e.g., lead) and organic contamination (e.g., polycyclic aromatic hydrocarbons (PAHs)). The Site formerly contained lagoons; the residuals in these lagoons contain high concentrations of organic contaminants such as benzene, naphthalene, and PAHs and these contaminants have entered into the subsurface soils and shallow underground water.

The Site property continues to be used by numerous businesses for storage of equipment and materials.

Based upon the analytical results of the samples collected during the removal site evaluation and an evaluation of the potential threats posed by the hazardous substance contamination at the Site, EPA Region III approved additional funding to conduct additional response actions at the Site. The total funding now available for response actions is \$2,650,469. The response action will generally include actions intended to consolidate onto the TCCA property those hazardous substances posing a threat which have migrated from the property and to minimize further release of hazardous substances from the Site through a combination of disposal and covering actions.

After obtaining formal access to the railroad property adjacent to the TCCA property, EPA re-initiated the response action at the Site. Initial actions focused on characterizing the contaminants upon the railroad right of way, evaluating drainage from the TCCA property, evaluating details of the pending response action (such as erosion controls), and coordinating with the Site owner, users of the property, and State and Local government entities. The OSC informed adjacent residents of the general nature of the pending response action and then re-initiated response activities on October 19, 2010.

A Time Critical Removal Action is ongoing and current activities are described in the next sections.

### **Current Activities**

ERRS equipment operators continue to load trucks with small lagoon waste material, excavate small lagoon waste, and backfill excavated areas with stockpiled sandblasting material.

At total of 38 loads of small lagoon non hazardous waste with an estimated weight of 874 tons were shipped to Waste Management GROWS/ Tulleytown landfill in Morrisville Pennsylvania. 3342 tons todate.

We have nearly reached our current approved limit for disposal at the landfill. A request for increase has been submitted by the landfill and is awaiting PADEP approval.

EPA met at Site with a few citizens who reside to the South and West of the Site this week. Site operations past, current, and potential future were discussed. Several of the topics included potential health risk from the Site (again, past, present, and future). EPA reiterated that the majority of the contaminants of concern were buried at the Site and there isn't a direct line of exposure to the residents. The surface sands also contaminants including Polycyclic Aromatic Hydrocarbons (PAHs) and metals (lead and beryllium for example). When these sands migrated, it was generally towards the North (down-gradient) and East . The primary direction was to the North towards the rail road tracks. The method of migration was either via or surface water runoff to the North or prevailing wind to the East. During the Removal Action, EPA has implemented efforts to minimize and eliminate such migrations through a variety of techniques including but not limited to additional grading, installing a sediment pond, tarping, wetting and other engineering controls.

EPA continues to maintain "clean" and dirty" sides of the Site to minimize the potential for cross contamination. In an effort to meet this goal, specific traffic patterns that have been established for Site workers as well as Site tenants continue to be enforced.

The stock pile of sand that was consolidated on-site has been depleted. Backfill has arranged to be imported from an off-site location to serve as fill in lieu of the sand.

Air monitoring continued around the Site, as per the air monitoring plan, Odors continue to be present during the excavation and truck loading. However, air monitoring indicates no levels of concern.

In addition to the standard equipment used EPA also conducted air monitoring around the Site using a more sensitive instrument called a PPB RAE. This instrument measure concentrations of volatile organic compounds in parts per billion. The standard instrument (Multi RAE) detects in parts per million or PPM. Parts per million is the unit measurement with which we traditionally use to evaluate worker safety. This is also, depending on the contaminant, the unit measurement that OSHA uses. Air monitoring with the PPB Rae confirmed the Area RAE findings that there are no levels of concern on the Site. The PPB RAE did detect concentrations when within feet (generally 1-3) of the waste, but the levels were still below health concerns. Additionally, the levels immediately and rapidly dropped as the distance from the waste increased. It should be noted that while the odor is still present, the data indicates the concentrations are below levels of concern.

EPA continued outreach to the community through a variety of methods including the website, email, phone call, and door to door.

EPA also continues to coordinate with appropriate regulatory agencies as needed including the Township and Pennsylvania Department of Environmental Protection.

EPA is still estimating a mid April completion of major disposal and backfilling activities. There will be some remaining restoration activities that go beyond as required.

#### **Next Steps**

Continue to evaluate the schedule and close out of the Removal Action.

## **Disposition of Wastes**

| Waste Stream                    | Quantity          | Manifest # | Disposal Facility                      |
|---------------------------------|-------------------|------------|----------------------------------------|
| Hazardous Waste Liquids (USTs)  | 13,330<br>gallons | various    | Republic Environmental<br>Hatfield, PA |
| Hazardous Waste Liquids (AST-2) | 14,011<br>gallons | various    | Republic Environmental<br>Hatfield, PA |

| Non Hazardous Liquids (AST-1)                         | 14,590<br>gallons   | various   | Republic Environmental<br>Hatfield, PA        |
|-------------------------------------------------------|---------------------|-----------|-----------------------------------------------|
| Non Hazardous Solids (AST-4)                          | 31840<br>pounds     | 552437    | Republic Environmental<br>Hatfield, PA        |
| Non Hazardous Liquids (Ammonia)(AST-5)                | 7518 gallons        | various   | Vickery Environmental,<br>Vickery, OH         |
| Hazardous Waste Solids (USTs)                         | 387 tons<br>(est)   | various   | CasieEcology, Vineland, NJ                    |
| Hazardous Waste Liquids (UST-4)                       | 8356 gallons        | various   | Giant Resource Recovery,<br>Sumter, SC        |
| Hazardous Waste Solids (UST-4)                        | 25,632<br>pounds    | 004352265 | Green America Recycling,<br>Hannibal, MO      |
| Hazardous Waste Debris (UST-4)                        | 1500 pounds         | 004352265 | Waste Management, Emelle, AL                  |
| Flammable Liquids(drums)                              | 165 gallons         | 004352265 | Ross Incineration, Grafton,OH                 |
| Flammable solids                                      | 300 pounds<br>(est) | 004352265 | BuzziUnicem, Cape Girardeau,<br>MO            |
| Phosphoric Acid                                       | 55 gallons          | 004352265 | WastePath, Calvert City, KY                   |
| Non Hazardous Liquids (drums)                         | 140 gallons         | 004352265 | WastePath, Calvert City, KY                   |
| Non Hazardous Soil (around UST-4)                     | 209.42 tons         | various   | Commonwealth Environmental,<br>Hegins, PA     |
| Waste Fuel                                            | 760 gallons         | 77436     | Enviromental Recovery Corp.,<br>Lancaster, PA |
| Non Hazardous solids (UST residue from scrapping ops) | 300 pounds          | 001       | Modern Landfill, York, PA                     |
| Non Hazardous Construction Debris                     | approx 600<br>tons  | various   | Minerva Enterprises                           |
| Non Hazardous solids (large lagoon)                   | approx 8548<br>tons | various   | Clean Earth, Morrisville, PA                  |
| Non Hazardous solids (small lagoon)                   | approx 3342<br>tons | various   | Waste Management ,<br>(GROWS), PA             |
| Hazardous solids (small lagoon)                       |                     | various   |                                               |
| Non Hazardous solids (sands)                          |                     | various   |                                               |

 $\underline{response.epa.gov/TCCA}$