

United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Wednesday, July 28, 2004

From: Steven Renninger

To: Rich Murawski, ORC
Danny Jones, City
Paul Weber, CFD

Jim Smith, City
Duane Herth, City
Malcolm Adcock, CHD

Subject: Initial
Herron Avenue Drum Site
3709 Herron Avenue, Cincinnati, OH
Latitude: 39.1558000
Longitude: -84.5531000

POLREP No.: 1	Site #: B56V
Reporting Period: 07/06/2004 to 7/28/2004	D.O. #:
Start Date: 7/6/2004	Response Authority: CERCLA
Mob Date: 7/6/2004	Response Type: Time-Critical
Demob Date:	NPL Status: Non NPL
Completion Date:	Incident Category: Removal Action
CERCLIS ID #: OHN 000 508 879	Contract # 68-S5-03-06-0025
RCRIS ID #:	

Site Description

The Herron Avenue Drum Site (Herron) consists of approximately 4 acres of land that has been developed for residential housing in Hamilton County, Cincinnati, Ohio. The Site consists of twenty parcels located along the southern portion of Herron Avenue, and is bordered to the east by the West Fork of Mill Creek, to the west by Cass Avenue, and to the south by Dreman Avenue. The Herron Avenue Site is surrounded by an area of residential properties of the north, west, and south perimeters. The West Fork of Mill Creek and a public playground are located along the eastern perimeter.

Numerous environmental investigations were performed at the Site between 1995-2003. These investigations uncovered several potential environmental concerns at the Herron Site including surface and partially buried drums as well as possible lead contamination. In November 2002, South Cumminsville Community for Better Housing, Inc., purchased the Site for the purpose of developing 20 residential lots. The City of Cincinnati received an easement to install public storm sewers at the Site on October 24, 2002. Two 55-gallon drums with unknown contents (liquid/sludge) were encountered during excavation activities associated with the Herron Avenue sanitary sewer construction project on March 18, 2003. Construction activities were halted with approximately 75 feet of sewer line remaining to be laid to finish the project. A geophysical survey conducted by a City of Cincinnati contractor identified numerous subsurface anomalies across the site.

In July, 2003, the City of Cincinnati requested U.S. EPA assistance in conducting a potential time-critical removal action at the Herron site. The City of Cincinnati noted drums in various stages of deterioration were found along with what appeared to be paint, petroleum, solvent, and foundry sand waste

On July 1, 2003, U.S. EPA performed test trenching at four locations on the City of Cincinnati right-of-way portion of the Site. Three of four test trenching locations identified subsurface drums as the geophysical anomalies, the fourth location revealed tires as the anomaly. Foundry sand was encountered at all U.S. EPA test trench locations to a depth of 10-15' below ground surface. Subsurface drums were noted to be in a deteriorated condition with contents leaking to the surrounding soil and sand. Drum waste contents were noted as liquid solvent, paint, black tar, and debris. Partially buried drums were documented along a 200' area of the creek bank.

U.S. EPA sample results of the foundry sand encountered in the test trenches indicated the presence of total lead at concentrations of up to 446 ppm. Two drum had flashpoints low enough to be considered ignitable waste streams. Drum sample D-7 contained acetone (14,000 ppm), ethylbenzene (21,000 ppm), methyl ethyl ketone (16,000 ppm), toluene (120,000 ppm), and xylenes (73,000 ppm). The

concentration of methyl ethyl ketone (16,000 ppm) exceeded the TCLP regulatory limit of 200 ppm.

In September, 2003 an Action Memo was signed authorizing U.S. EPA removal activities at the Herron Avenue site.

Current Activities

On July 6, 2004, U.S. EPA and their ERRS (EQM) & START (TTEMI) contractors mobilized to the site to prepare for removal activities. A health and safety plan was signed and implemented on site. The U.S. EPA Office of Public Affairs mailed a Herron Avenue Drum Site Fact Sheet to the surrounding neighborhood.

During the week of July 6, 2004, ERRS established work zones and mobilized trailers to site. ERRS began clearing vegetation from the excavation areas. U.S. EPA met with the Cincinnati Fire Dept to complete a Site Contingency Plan. The Site Contingency Plan was distributed to local response agencies. Using a previous site survey conducted by a City of Cincinnati subcontractor, START established a grid system for the excavation area. Twenty-eight grids, approximately 20 meters by 20 meters were mapped out and will be marked on site to follow the progression of excavation and test trenching activities. Site security was initiated during non-working hours. Perimeter warning signs were posted.

During the week of July 13, 2004, START established 8 air monitoring stations at the site perimeter and conducted an initial round of air sampling. Perimeter samples were collected and analyzed for lead. All samples were non-detect. ERRS continued clearing debris and vegetation in the excavation areas. The U.S. EPA conducted a site briefing with City of Cincinnati representatives.

During the week of July 19, 2004, no on-site work.

During the week of July 19, 2004, ERRS completed vegetation clearing in 28 grids. On July 28, 2004, ERRS initiated drum removal in Grid #1.

Planned Removal Actions

Excavation initiated in Grid #1 on July 28, 2004. ERRS will begin removing drums and visibly contaminated soil from the hillside. The excavation will then move back from the hillside towards the middle of the site. Test trenching will be done at 10 meter intervals in the grid to determine if additional drums are present.

Next Steps

- Begin excavation and test trenching in Grids #1, #8, #2, #9;
- Continue perimeter air sampling and air monitoring.

Key Issues

Due to the lack of space available at the Herron site, the City of Cincinnati identified an alternate location owned by the City to stage roll-off boxes pending disposal.

response.epa.gov/herronave