

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
New Method Cleaners - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #1**
Initial Response & Material Secured
New Method Cleaners
A22D
Trenton, NJ
Latitude: 40.2303436 Longitude: -74.7744914

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From: Keith Glenn, OSC/Environmental Scientist

Date: 6/20/2013

Reporting Period: June 18, 2013 through June 21, 2013

1. Introduction

1.1 Background

Site Number:	A22D	Contract Number:	S2-10-03
D.O. Number:		Action Memo Date:	6/18/2013
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	6/18/2013	Start Date:	6/18/2013
Demob Date:		Completion Date:	
CERCLIS ID:	NJN000206585	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Emergency Response action taken to address containers that are leaking, bulging, and/or compromised due to rust, missing lids, and disturbance.

1.1.2 Site Description

The City of Trenton and the New Jersey Department of Environmental Protection ("NJDEP") requested the United States Environmental Protection Agency ("EPA") to conduct a removal assessment of the New Methods Cleaners, Inc. Site. Initial EPA requests were received in June 2006 from NJDEP case managers. EPA received additional verbal and email requests from the City of Trenton in August 2012. On March 27, 2013 the Region received a formal request from NJDEP for a removal action consideration under CERCLA.

On April 1, 2013 the Removal Action Branch commenced operations of a removal assessment at the Site and surrounding properties. As part of these operations, hazardous characteristics ("HAZCAT") techniques were conducted on the contents of various containers located inside the facility as well as outside. Numerous containers, a majority of which were 55-gallon drums, were found to be compromised. Drums were noted to be leaking, rusted, and/or bulging. Several containers had been removed of their tops and contents voided, suspected to the ground or the nearby surface water stream. Approximately 30 containers of unknown contents and without labels were found outside of the structures. Two (2) 275-gallon totes associated with a defunct groundwater treatment plant were found inside the building containing unknown liquids. In attempts to identify characteristics of material, nineteen (19) containers were opened and aliquots of the contents were used for HAZCAT purposes. In addition, two (2) containers were sampled via laboratory analysis for volatile organic compounds ("VOCs").

During the RSE and following HAZCAT of material, efforts were made to temporarily stabilize the containers

that were leaking. Drums that were lying on their sides were up-righted and placed in the same area with the other containers. Temporary lids were placed on open-top containers to prevent rain from intruding on the material. Holes located on the sides were patched with sorbert cloths and secured as best as practical. A temporary berm was placed around the bulk of the containers to prevent any potential migration of contents. Although not permanent measures, these activities were done until sufficient analytical data could be received from samples collected of several containers. Such data was received in June 2013.

This area is heavily used by squatters, homeless, and vagrants seeking shelter or loitering for social reasons. It is an environmental justice community based on income levels, residents of minority ethnicity, and additional demographic features.

The Site is currently operated by Bell Boy Cleaners, a dry cleaning facility. The property owner, Selesnick Property, LLC has not paid taxes since 2008. Discussions have occurred with the business owner, who claims that Selesnick Property LLC no longer exists and the property was abandoned. Bell Boy Cleaners does not have a leasing agreement with Selesnick Property and is not paying rent.

Past activities at the Site, such as dumping of perchloroethene, have contributed to contaminated soils, groundwater, and surface water media. EPA personnel have been told that drums of material utilized for the previous dry cleaning operations, not associated with Bell Boy Cleaners, are several of the compromised containers located outside.

This facility has not been owned/operated by any federal, state or local government entity. This is the first removal action undertaken by EPA at the Site.

1.1.2.1 Location

The New Methods Site is located at 310 Prospect Street, Trenton, Mercer County, New Jersey. It is bordered to the north and east by Prospect Street, to the south by East Stuyvesant Avenue, and the west by a vacant lot and stream. The 1.9 acre property includes a 4,200 square-foot structure that currently houses the Bell Boy Cleaners and an unused area. The area is primarily residential with light commercial areas to the south and east. Adjacent to the stream is a paving company that has been in operation since 1948, Barrett Paving. Vacant lands and Power Magnetics, Inc, a company that constructs magnetic and voltage equipment for utilities since 1968, are located to the west. Although no residential properties are located on East Stuyvesant Avenue, the residential properties that line Rutherford Avenue provide access to this southern boundary. Located across the street from the Site is a Senior Citizen Center and Community Recreational Hall that is utilized by area children.

1.1.2.2 Description of Threat

Actual releases of hazardous substances from onsite containers have been documented. The HAZCAT operation indicated container contents are highly flammable, containing chlorinated compounds, and/or with high alkalinity. Samples were collected from two containers and analyzed for VOCs. Results were received in June 2013 and indicated the presence of dichloroethene, trichloroethene, and tetrachloroethene. Labels on several containers included the following: isopropyl alcohol, methyl alcohol, and staticol (a trade name product with glycol ethers). Containers were found to be compromised with contents spilled onto the ground, near a surface water creek, and throughout the rear of the subject property. Several containers were also found to be bulging, rusted out, and free of sealed tops presenting a hazard to human health and the environment. Heavy rains have also been causing overtopping conditions of several drums that are void of covers, causing additional spills onto the soil.

The hazardous substances listed below were observed to be present at the Site during the removal site evaluation in April 2013.

Compound	Statutory Source for a Hazardous Substance			
	311(b)(2) CWA	307(a)CWA	112 CAA	3001 RCRA
1,2-Dichloroethene		X		X
Trichloroethene	X	X	X	X
Tetrachloroethene		X	X	X
Methyl Alcohol			X	X
Staticol (trade name with glycol ethers)			X	

The following hazardous substances are unlisted hazardous wastes with characteristics designated as a hazardous substance under Resource Conservation and Recovery Act ("RCRA") §3001. This material was analyzed through field instrumentation that gives the hazard characteristic of the substance.

- Approximately 6 containers of flammable liquids;
- Approximately 1 drum of high alkalinity;
- Approximately 2 containers indicating the presence of chlorides, a corrosive;
- Approximately 20 containers of unknown contents.

The mechanisms for releases to the environment are from poor handling practices and storage of materials due to abandonment. Along with poor housekeeping, most containers are located in an unsecure location and exposed to adverse weather elements. Human contact and interference with the containers is evident as several empty containers are located along the surface water creek and used as tables, chairs, and toilets. Common routes of exposure to these materials include dermal contact, ingestion, and inhalation.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Analytical results indicate that chlorinated solvents are present in the compromised containers. Refer to the 1.1.2 for additional information.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

No previous actions have been taken by EPA or any other federal, state or local entity to address the compromised containers of hazardous substances.

Following HAZCAT of material and sample analysis of several containers, a representative of Selesnick Property LLC was contacted. Michael Selesnick was given a Notice of Federal Interest dated June 4, 2013 identifying the containers, contents of such, and the poor conditions that are leading to an active release. The notice, sent via certified mail, gave the property owner until June 18, 2013 to respond with availability to perform the stability, cleanup, and removal of materials. On June 18, 2013 EPA received a letter from Mr. Selesnick indicating that he does not own the property, conveying no action to be taken on behalf of Mr. Selesnick or Selesnick Property LLC.

2.1.2 Response Actions to Date

The ERRS contractor was identified and activated on June 18, 2013. The following day, all parties met at the facility to commence stabilization activities. Significant overgrowth around several containers was removed and an inventory of containers was conducted. Several drums were found to have broken through previous temporary measures designed to prevent further migration. Those conditions were addressed. Plans were formulated for over-packing containers, content transfer, and bulking like materials.

On June 19, 2013 all containers located outside were secured in over-pack drums. The highly flammable material located in tanks associated with an old dry cleaning unit were evacuated using pumps. This material was transferred to three 55-gallon drums and remains secured inside the facility. The material located in 275-gallon totes associated with the former pump and treatment unit was transferred into five 55-gallon drums and secured inside the facility until disposal.

Samples were collected from each container. All like materials, based on HAZCAT results, generated composite samples for bulked materials. A request for bid has been generated by the ERRS contractor for analysis of composite samples for disposal purposes. Samples are expected to be sent to the laboratory on June 24, 2013.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Following HAZCAT of material and sample analysis of several containers, a representative of Selesnick Property LLC was contacted. Michael Selesnick was given a Notice of Federal Interest dated June 4, 2013 identifying the containers, the contents of such, and the poor conditions that are leading to an active release. The notice, sent via certified mail, gave the property owner until June 18, 2013 to respond with availability to perform the stability, cleanup, and removal of materials. On June 18, 2013 EPA received a letter from Mr. Selesnick indicating that he does not own the property, conveying no action to be taken.

Mr. Selesnick continues to state that his company, Selesnick Property LLC, is no longer in existence. The company has not paid taxes on the Site property since 2008. As such, Mr. Selesnick claims that he no longer owns the land and is therefore not responsible for the conditions presented at the Site.

The Region 2 Office of Regional Council (ORC) has dedicated an attorney for this Site.

2.1.4 Progress Metrics

The following table will be completed following the analysis of samples collected to finalize the waste streams associated with the New Method Cleaners Site.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Flammable Liquid					
Spent Activated Carbon					
Chlorinated Solvent					

2.2 Planning Section

2.2.1 Anticipated Activities

ERRS will deliver the collected samples to the awarded laboratory for analysis. This data will be used to generate a request-for-bid for disposal of the materials. Following such, the contractors and EPA will return to the New Method facility and organize the transport of containers to the awarded treatment/disposal facility. All materials should be removed from the facility by July 19, 2013.

2.2.1.1 Planned Response Activities

Obtain analytical data of samples collected for disposal purposes and commence the transport of materials to a disposal facility.

2.2.1.2 Next Steps

Maintain the security of the containers and prepare for disposal.

2.2.2 Issues

None to report.

2.3 Logistics Section

ERRS and Region 2 are dealing with any logistical issues or concerns.

2.4 Finance Section

2.4.1 Narrative

ON June 18, 2013 the acting director for ERRD verbally authorized a project ceiling of \$75,000 for this removal action, of which \$50,000 are utilized for the mitigation contractor.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$50,000.00	\$0.00	\$50,000.00	100.00%
TAT/START	\$5,000.00	\$0.00	\$5,000.00	100.00%
Contingency	\$20,000.00	\$0.00	\$20,000.00	100.00%
Intramural Costs				
USEPA - Direct	\$10,000.00	\$0.00	\$10,000.00	100.00%
USEPA - InDirect	\$28,000.00	\$0.00	\$28,000.00	100.00%
Total Site Costs				
	\$113,000.00	\$0.00	\$113,000.00	100.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Safety is being provided by the ERRS contractor and the OSC.

2.5.2 Liaison Officer

The Liaison Officer is not activated for this removal action.

2.5.3 Information Officer

The information officer is not activated for this removal action.

3. Participating Entities

3.1 Unified Command

UC is not necessary for this response.

3.2 Cooperating Agencies

NJDEP and the City of Trenton has been working with EPA on this project.

4. Personnel On Site

All personnel departed the site following activities on June 20, 2013:

1 EPA OSC
3 ERRS

5. Definition of Terms

Definition of Terms

Assisting and Cooperating Agencies - Agencies who are assisting the EPA response, but are not a part of Unified Command.

E Goods - Electronic machines which contain hazardous components. Emergency Response - any activity undertaken by the Operations Section which mitigated an immediate threat to human health or the environment.

FRP - Facility Response Plan. Under the Clean Water Act, as amended by the Oil Pollution Act, a plan for responding, to the maximum extent practicable, to a worst case discharge, and to a substantial threat of such a discharge, of oil. Required by certain facilities that store and use large quantities of oil.

Household Hazardous Waste - Small quantity waste from households that contain corrosive, toxic, ignitable, or reactive ingredients is hazardous. This includes pesticides, paint, solvents, etc.

Hazardous Debris - Debris which contains compounds that make it inappropriate for municipal landfill disposal

Monitoring - Using equipment which will give limited real-time information about constituents in environmental media. This method is used most often for air and water testing.

RCRA - Resource Conservation and Recovery Act.

RMP- Risk Management Plan. Under the Clean Air Act, certain facilities with large quantities of toxic potentially air born chemicals whose releases may impact human populations are required to submit to EPA a plan for hazard assessment, prevention, and emergency response.

Sampling -The process of taking environmental media for analysis at a laboratory of its constituents. These tests may require multiple days to complete, but test for a wider array of constituents than monitors.

Small Container - any container with a potential capacity of less than 5 gallons.

TRI - Toxic Release Inventory - A publicly available EPA database that contains information on toxic chemical releases and other waste management activities reported annually by certain covered industry groups as well as federal facilities. This inventory was established under the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) and expanded by the Pollution Prevention Act of 1990.

Unified Command - A structure based on the Incident Command System (ICS) that brings together the Incident Commanders of all major organizations involved in the incident in order to coordinate an effective response, while at the same time allowing each to carry out their own jurisdictional, legal, and functional responsibilities.

White Goods - Large home electronics such as refrigerators, washing machines, and dryers.

WW - Wastewater Treatment Facilities

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaossc.org/NewMethodCleaners

6.2 Reporting Schedule

An additional POLREP will be generated following the removal of material.

7. Situational Reference Materials

No information available at this time.

POLREP #1 Last Updated 6/24/2013