

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Caswell, Strauss & Co., Inc. - 1660 Oak Tree Road - Removal Polrep
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #3
Final
Caswell, Strauss & Co., Inc. - 1660 Oak Tree Road
A296
Edison, NJ
Latitude: 40.5727545 Longitude: -74.3431445

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Date: 8/27/2013

Reporting Period:

1. Introduction

1.1 Background

Site Number:	A296	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/15/2012	Start Date:	10/15/2012
Demob Date:	2/28/2013	Completion Date:	7/3/2013
CERCLIS ID:	NJC200400968	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

The property is a commercial property owned by Extra Space Properties Thirty Six, LLC and utilized as a self storage facility by Extra Space Storage.

1.1.2 Site Description

The Site presently consists of approximately 4.65 acres of land located within a tract, identified in the Edison Tax Map as Block 546-1, Lot 39A in Edison Township, Middlesex County, New Jersey.

1.1.2.1 Location

The Site is within the footprint of land that was once owned by Caswell, Strauss & Co., Inc. prior to 1959. At various times from the 1940s to 1959, Caswell carried out a lead smelting operation on the land it owned including the Site.

The Site is situated in a suburban area characterized by residential, commercial retail and office development and vacant land and is improved with a 30-year-old, 93,875 SF, 1,024-unit self-storage facility. Site improvements include 10 separate one and two story buildings and ancillary site work. Two of these 10 buildings were built in 1998/99. The buildings are of slab-on-grade construction, and the superstructures of the older buildings are a composite of structural steel and masonry bearing walls. The two newer buildings are built entirely of light gauge steel.

1.1.2.2 Description of Threat

Lead is a cumulative poison where increasing amounts can build up in the body eventually reaching a point where symptoms and disability occur. Particularly sensitive populations include children and pregnant women, because of the fetal transfer of lead. Cognitive deficits are associated with fetal and childhood exposure to lead. An increase in blood pressure is the most sensitive adverse health effect from lead exposure in adults. Effects of kidney, nervous system, and heme-forming elements are associated with increasing blood lead concentrations, both in children and adults. Other symptoms include decreased physical fitness, fatigue, sleep disturbance, aching bones, abdominal pains and decreased appetite.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The Site was referred to the Environmental Protection Agency by the New Jersey Department of Environmental Protection in November 2011. The referral letter is included in Appendix B. Between January and May, 2012, EPA collected soil samples from a total of 29 residential properties located on Hilltop Road, Libby Court and Henry Street. The analytical results identified lead in concentrations greater than the EPA residential screening level of 400 parts per million at twelve of the 29 properties sampled. The properties where lead was identified have at least one quadrant or drip line location with lead greater than the action level of 400 ppm. From the twelve properties, the results for lead in quadrant surface samples ranged from 34 ppm to 5,610 ppm. Samples collected from below the surface (6" – 12") ranged from 13 ppm to 5,320 ppm. The concentration of lead in samples collected from depths below one foot ranged from 7.7 ppm to 10,100 ppm. Drip line samples ranged from 11.6 ppm to 2,670 ppm.

In addition to the residential properties, the EPA collected soil samples from two commercial properties located within the historic footprint of the former Caswell, Strauss & Company, Inc. property at 1660 and 1670 Oak Tree Road and one commercial property located adjacent to this property at 1680 Oak Tree Road. Analytical results identified lead in concentrations greater than the EPA commercial screening level of 800 ppm on all three properties. Lead was detected in concentrations ranging from 12 ppm to 61,100 ppm on the 1660 Oak Tree Road property and from 1.0 ppm to 175,000 ppm on the 1680 Oak Tree Road Property.

Given the topography of the Site and the natural and manmade drainage pathways, surface water runoff from the Extra Space Storage property (1660 Oak Tree Road) drains directly onto the adjacent lots to the north, east and west. The highest lead concentrations were found at 2" – 6" below ground surface depth at the Extra Space Storage property and in an area immediately adjacent to the fence line on the Air Products property (1680 Oak Tree Road).

During the sampling event, the EPA observed surface water runoff from the Extra Space Storage property draining and pooling on the neighboring properties. Based upon the sampling conducted by the EPA, surface water runoff containing lead contaminated soils is believed to have migrated from the Extra Space property onto the adjacent commercial and residential areas.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

After returning from an extended break following Hurricane Sandy, the contractor for Extra Space resumed remediation efforts and completed the remediation of the affected areas by December 31, 2012. Restoration activities at the site were completed by the end of February 2013. The following activities were completed by the PRP:

- The old perimeter fence surrounding the areas of concern on the northern, eastern and western property boundaries was removed and replaced with a new perimeter fence, which allowed for work to be conducted to address the soil contamination in these areas.
- Excavation of elevated concentrations of lead was conducted in three areas of concern. In the remaining areas of concern, the area was excavated to a depth of approximately four inches and then capped with either an impervious surface (i.e. concrete) or at least two feet of clean material (i.e. soil).
- Drainage improvements were made to the northern and eastern boundaries of the property to limit the amount of runoff the adjacent residential properties receive.
- Restoration activities conducted included the installation of several trees along the northern property boundary as well as grass.
- Approximately 40 tons of hazardous, lead contaminated soil (D008) was shipped off site for treatment and disposal to the Clean Earth of North Jersey facility in Jersey City, NJ.

EPA received the Final Closure Report incorporating all comments for the work conducted at this property on July 3, 2013.

On July 3, 2013, the region certified that the PRPs have fully met the terms of an AOC.

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

A CERCLA Settlement Agreement and Order on Consent for Removal Action was signed on July 25, 2012 by the property owner of 1660 Oak Tree Road for work to be conducted on their property. The work includes implementation of measures to eliminate direct contact with lead contaminated surface soils and to prevent the migration of lead contaminated soil via surface runoff and air currents to any lands adjacent to the property, design and construction of surface water runoff control measures to prevent surface water runoff

from the property from migrating onto adjacent properties, post-excavation sampling, site restoration, and maintenance activities as needed. This PRP Removal with enforcement instrument action (BB1) is not a takeover of the ongoing fund lead removal (RV1) that is being conducted on the adjacent residential properties. The PRP was deemed not liable for the work on the residential properties, only the property currently owned by the PRP.

2.1.4 Progress Metrics

Approximately 40 tons of hazardous, lead contaminated soil (D008) was shipped off site for treatment and disposal to the Clean Earth of North Jersey facility in Jersey City, NJ.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
D008	soil	20 Tons	011130567	stabilization	landfill
D008	soil	20 Tons	011130568	stabilization	landfill

2.2 Planning Section

2.2.1 Anticipated Activities

There are no further anticipated activities at this site.

2.2.1.1 Planned Response Activities

There are no further planned response activities at this site.

2.2.1.2 Next Steps

2.2.2 Issues

2.3 Logistics Section

Not applicable

2.4 Finance Section

2.4.1 Narrative

The work was conducted by the PRP under an AOC with the EPA.

2.5 Other Command Staff

2.5.1 Safety Officer

No safety issues were encountered during this reporting period.

2.5.2 Liaison Officer

Not applicable.

2.5.3 Information Officer

Not applicable.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

Extra Space Properties Thirty Six, LLC.
Environ Corporation
USEPA
Edison Department of Health

4. Personnel On Site

1 - EPA OSC
3 - Environ personnel

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.

