

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Wolff-Alport Chemical Company Radiological Site RV1 - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #14
Wolff-Alport Chemical Company Radiological Site RV1
A282
Ridgewood, NY
Latitude: 40.6923130 Longitude: -73.9025100

To: Mary Mears, USEPA, Region 2, PAD
Eric J. Wilson, USEPA, Region 02, SEMD
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From: Eric M. Daly, On-Scene Coordinator

Date: 10/14/2013

Reporting Period: October 07, 2013 thru October 13, 2013

1. Introduction

1.1 Background

Site Number:	A282	Contract Number:	EP-S2-10-01
D.O. Number:	0057	Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/23/2012	Start Date:	9/27/2012
Demob Date:		Completion Date:	
CERCLIS ID:	NYC200400810	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Short Term Time Critical Response

1.1.2 Site Description

The original building was subdivided and currently, the site contains several buildings that have been divided into several businesses. The total land area covers 0.75 acres bound by Irving Avenue on the southwest, and Cooper Avenue on the northwest. At one time, a railroad spur extended to the rear of the buildings; now there is an active rail line adjacent to the site within 125 feet. The spur area is presently unpaved and vegetated. The rear of these buildings is partially fenced, mostly overgrown with vegetation, and is used for storage of construction equipment and a couple of small boats. The surrounding neighborhood contains light industry, commercial businesses and residences.

The businesses at the site include a delicatessen and grocery store (1125 Irving Avenue), office space and unoccupied residential apartments with an attached building housing a tire shop (1125 Irving Avenue) and mini-ATV shop; a building with an auto body shop (15-14 Cooper Avenue) and office space; two buildings used for warehouse purposes (1133-1139 Irving Avenue and 1129 Irving Avenue); and a commercial building with an auto repair shop (1127 Irving Avenue).

1.1.2.1 Location

The Site is located at 1127-1129 Irving Avenue, in Ridgewood, New York located on the Brooklyn/Queens border.

1.1.2.2 Description of Threat

The Site contains active businesses that operate within structures formerly used by Wolff-Alport, a processor of materials that contained radioactive properties. The presence of radioactivity has been documented within and underneath the identified buildings, in the soil at the rear of the structures along a former rail spur, underneath the sidewalk along Irving Avenue in front of the former Wolff Alport building. Persons that work in or access the buildings at the Site or traverse the public sidewalk in front of the Site or trespass the rear portion of the Site will be exposed to ionizing radiation by passing over or coming into contact with these impacted areas. The area around the Site is, in part, residential in nature. A deli/grocery store on the corner of Irving and Cooper Avenues may tend to increase the number of persons that access the sidewalk in front of the Site. The railroad spur behind the building appears to be an area that is

accessed by people. Any excavation conducted at the Site, including on Irving Avenue, could result in increased direct gamma radiation exposures to persons working or walking in and around the disturbed area.

Surveys conducted at the Site indicate that elevated levels of radioactivity are present within one foot of the surface at the rear of the Site on the former rail spur. The area consists of bare soil overgrown with weeds. Although the parcel on which the former rail strip is reportedly considered abandoned and current ownership is questionable, the parcel is used to store heavy machinery, crane equipment and, on occasion, vehicles. As a result, the radioactive contamination can be spread offsite under this scenario and potentially be available for inhalation as a particulate since the streets near the Site sustain a significant amount of vehicular movement. Any excavation conducted at the Site, including on Irving Avenue, could result in an increased chance of contaminant migration, both directly on the roadway and through an airborne pathway, which could impact persons near the Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.1 Response Actions to Date

October 23, 2012: EPA OSC meet ERRS on-site. (Mobilization date)

October 24, 2012: EPA OSCs, EPA RIAB, NYC DOHMH, KEMRON, and Weston conducted shielding pilot study at the most elevated radiation levels along Irving Avenue Sidewalk in front of Lot 42 and 44 (Primo Auto Body Bays #1/ #2 and Terra Nova). Shielding study was also conducted inside of Primo Auto #2 Bay. The team also surveyed the sidewalk along Irving Avenue and delineated elevated radiation levels. The area was marked out with pink spray paint (NYC Color Code for survey work). OSC handed written access agreement to Boro Cabinet.

October 25-26, 2012: EPA OSCs, EPA RIAB, NYC DOHMH, KEMRON, and Weston tamp down foliage on Lot 31, stack debris, and conduct gross radiation survey to identify hot spots. Crane Company (Auringer) was contacted in person to remove remaining metal plates on Lot 31. The hole in the basement of IS 384 School was sealed.

November 10, 2012: EPA OSCs, EPA RIAB, NYC DOHMH, KEMRON, and Weston performed survey and delineated elevated radiation at Primo #1, Primo #2, and Terra Nova.

December 10, 2012: Radon canisters were placed in IS-384 crawl space area and throughout Audrey Johnson Daycare. The basement area of IS-384 and portions of Audrey Johnson Daycare were surveyed using the Rad7. One Rad7 unit was left in the IS-384 crawl space (where the sealed hole is located) to capture data for a three day period.

December 13, 2012: The radon canisters were picked up from IS-384. The Rad7 that was left for two days in IS-384 had some technical problems. The instrument was set up again on 12/13/12 and left it for collection until 12/19/12. The radon canisters were picked up from Audrey Johnson Daycare as well and all the canisters brought to the laboratory on 12/14/12. The Rad7 was used to complete the survey of the basement, offices and classrooms of Audrey Johnson Daycare. All quick survey readings using the Rad7 in both schools showed no increase above background in any of the occupied spaces. However, in one of the electrical closets in the basement of Audrey Johnson Daycare (A closet with an open window to Moffat Street) there were slight increased readings.

December 18, 2012: Radon canisters were placed in both Primo bays as well as Terra Nova. OSC Daly, Weston and NYC Health observed the workers in all three bays from 9 AM-5 PM to assist in determining the occupancy factor. The observers used the diagrams from the previous gamma delineation survey study to identify radiation level areas within the buildings. A chart was filled out with personnel, times and location specifics. This along with previous information/employee interviews will be used to determine the occupancy factor needed for the shielding calculations. OSC Daly is still working with the EPA attorney to gain access to the deli. This radon sampling will need to be performed separately.

December 19, 2012: The Rad7 was removed from IS-384 and then brought to Audrey Johnson Daycare basement closet for a three day run.

December 21, 2012: The radon canisters were picked up from both Primo bays and Terra Nova. The canisters were brought to the laboratory. The Rad7 was picked up from Audrey Johnson Daycare and then used to perform quick surveys at the Primo and Terra Nova Facilities.

December 27, 2012: The radon results for IS-384 and Audrey Johnson Daycare came back below the EPA action level of 4 pCi/l.

January 02, 2013: Bi-weekly inter-agency phone conference.

January 03, 2013: EPA OSC received the signed access agreement from the Bethel Church of God/Lot 31.

January 08, 2013: EPA OSCs met with NYC DOT to go over sidewalk shielding specifics and permit requirements.

January 09, 2013: The radon results for Primo and Terra Nova came back. There were a few readings that were slightly above the EPA action level of 4 pCi/l. Additional sampling will be performed in these areas to confirm these results.

January 10, 2013: EPA, NYC DOHMH and Weston performed the radiological survey on Lot #30 (Boro Cabinets) and Lot #31 (Old railroad spur).

January 15, 2013: The technical group had a phone conference discussing the shielding recommendation document compiled by EPA and NYC DOHMH.

January 23, 2013: David Weiss, Lot 46, faxed the signed access agreement.

January 28, 2013: OSC Daly visits Lot 46 tenants to set up radon sampling and analysis for February 4-6, 2013.

February 4, 2013: Radon canister placement at Deli Basement, Deli main floor, and Apartment # 2 (Lot 46). Canisters also placed at Primo #1 and Terra Nova for verification sampling.

February 5, 2013: Rad 7 Survey at Deli Basement, Deli main floor and Apartment #2

February 6, 2013: Deli Basement PIC survey conducted. Rad7 ran for 2 hours.

February 7, 2013: Radon canister results for Deli Basement, Deli main floor, and Apartment # 2 (Lot 46) are all below 4 pCi/l. However, there were elevated radon readings near basement hole that exhibited readings at approximately 3 pCi/l. Radon canisters results for Primo #1 and Terra Nova were below 2.5 pCi/l. The Rad7 readings showed increased Thoron near the basement hole which is consistent with previous investigation of holes/drains in the area. Further radon sampling for these areas are being planned.

February 13, 2013: Bi-weekly inter-agency phone conference.

March 21, 2013: NYC DOHMH Health Physicist submitted revised proposed shielding document with new Lead layer options.

March 25, 2013: Property surveyor and fencing subcontractors were selected. The tentative start date for the surveying of Lot 31 is April 8, 2013. Fencing subcontractor will tentatively begin installation on April 9, 2013.

April 08, 2013: OSC and ERRS Mobilizes at the Site to prepare Lot #31 for fencing and shielding operations.

April 09, 2013: Property boundary survey and fence installation begins.

April 10, 2013: Monthly inter-agency phone conference.

April 16, 2013: Concrete Shielding is installed on Lot #31 (Railroad Spur Property) on the ground along the back of Primo #2 and Terra Nova section of the building. The fencing installation continues. Terra Nova Representatives (Lot #44) agrees with shielding proposal.

April 17, 2013: Rock and clean fill was dropped off and spread in the area of the office trailer (Moffat Street Gate) to form a capped section. The capped section serves multiple purposes. First it serves as shielding of the elevated radioactive soil. The Ludlum 19 readings of the capped area ranges from 10-15 microR/Hr. The Ludlum 19 readings at the edge of the capped area are 35-40 microR/Hr. Secondly, this cap will prevent spread of contaminated soil and will be the "clean" zone. This area will be utilized as the command post for upcoming operations as well as used for parking vehicles and equipment staging. The fencing installation continues. Once the fence is complete, the uncapped area will be off limits.

April 19, 2013: Fence is completed. OSC meets with radon mitigation system specialist to perform a walkthrough at the Terra Nova facility.

May 02, 2013: Property Owner for Lot #42 (Primo #2/Terra Nova) agrees to shielding proposal.

May 05, 2013: Property Owner for Lot #44 (Primo #1) agrees to shielding proposal.

May 08, 2013: Monthly inter-agency phone conference.

May 14, 2013: Primo Representative (Tenant at Lot # 42 and Lot # 44) agrees with shielding proposal.

May 23, 2013: KEMRON Response Manager provides OSC with cost estimate for remainder of response action.

June 03, 2013: OSC and KEMRON mobilize at site. The electrician installed an outlet for the radon mitigation system at Terra Nova Facility. Geotextile fabric and rock/soil mix were dropped off at Lot #31 in order to continue the coverage of the railroad spur property.

June 06, 2013: Rock/soil mix covering complete at Railroad Spur property. OSC and KEMRON demobe from Site.

June 13, 2013: NYS and NYC requested EPA's assistance in surveying the perimeter around the Wolff Alport Site. Video phone conference with EPA management, OSCs, EPA Health Physicist, NYC DOHMH, NYC DEP, NYS DOH, and NYS DEC.

June 19, 2013: Monthly inter-agency phone conference.

June 26, 2013: The Action Memo was revised by OSC Daly and OSC Ferriola and then sent to RPB and RAB Management.

July 01, 2013: Perimeter Survey phone conference with EPA management, OSCs, EPA Health Physicist, NYC DOHMH, NYC DEP, NYS DOH and NYS DEC.

July 12, 2013: Perimeter Survey phone conference with EPA management, OSCs, EPA Health Physicist, NYC DOHMH, NYC DEP, NYS DOH and NYS DEC.

July 17, 2013: Monthly inter-agency phone conference.

July 23, 2013: The Action Memo was revised and reviewed by RPB Management.

July 25, 2013: Perimeter Survey phone conference with EPA management, OSCs, EPA Health Physicist, NYC DOHMH, NYC DEP, NYS DOH and NYS DEC.

July 26, 2013: Perimeter Survey Plan finalized by EPA OSCs, EPA Health Physicist, NYC DOHMH, NYC DEP, NYS DOH and NYS DEC.

July 29, 2013: Perimeter Survey Field Teams mobilized at Wolff Alport Site (EPA -OSCs Daly and Ferriola, Oleg Povetko, Mazeeda Khan, NYC DOHMH, NYS DOH, Weston and KEMRON). Survey instrumentation utilized includes: Rad7 (Radon/Thoron Gas detection), Fluke Pressurized Ion Chamber Radiation Survey Meter (Hand held Gamma Radiation detection) and Mobile Detection System (Vehicle Gamma Radiation detection). Surface soil samples may be obtained by NYS DOH if elevated readings are discovered. Radon canisters were placed in the Terra Nova office to obtain radon results after the mitigation system was modified on June 03, 2013.

August 5, 2013: Perimeter Survey completed.

September 4, 2013: OSC at the Site for mobilization and staging of two (2) 20'Conex Storage Containers and one (1) Office Trailer Generator. Weston Personnel was on-site to start labeling items and taking information in Primo #1.

September 8, 2013: Mobilization of OSC, ERRS (Foreman and two (2) Techs) and one (1) Weston Tech. Site Command Post Trailer set up. Railroad Spur Lot cleared of brush for staging. The labeling and inventory of Primo #1 equipment continues.

September 9, 2013: Mobilization of additional ERRS Personnel (Operator and one (1) tech). Primo #1 cleanout commences. Equipment being systematically relocated to staged storage containers Railroad Spur Property (Lot 31).

September 10, 2013 thru September 13, 2013: Relocation of equipment to storage containers continued. OSC Ferriola visited Site to finalize lead (Pb) Shielding design. A six foot deep pit was discovered under a wooden stage in the rear of Primo #1. Primo #2 Compressor is located on the stage. OSC Gallo coordinated site work on September 12th and September 13th.

September 15, 2013: Primo #1 stage dismantling and compressor relocation.

September 10, 2013 thru September 13, 2013: Relocation of equipment to storage containers continued. OSC Ferriola visited Site to finalize lead (Pb) Shielding design. A six foot deep pit was discovered under a wooden stage in the rear of Primo #1. Primo #2 Compressor is located on the stage. OSC Gallo coordinated site work on September 12th and September 13th.

September 15, 2013: Primo #1 stage dismantling and compressor relocation.

September 16, 2013: Primo #1 Pit cleared of debris. Gamma survey performed on the pit soil using the Ludlum 19. There were two areas (approximately 5'x3' each) that gave a reading of 500 microR/hr (\approx 333 microR/hr using PIC conversion) on contact. These same areas gave readings of 275 microR/hr (\approx 183 microR/hr using PIC conversion) at 3' above the soil surface. The average reading on contact throughout the pit was 225 microR/hr (\approx 150 microR/hr using PIC conversion). Relocation of materials from Terra Nova started.

September 17, 2013: Eighty yards of clean soil received to fill pit in Primo #1. Gamma survey was performed on the pit area with the clean fill and the readings ranged from 50 microR/hr to 100 microR/hr (\approx 33 microR/hr to 67 microR/hr using PIC conversion) on contact. Terra Nova vehicle was relocated to railroad spur and covered.

September 18, 2013: Primo #1 floor drain cleared and sewer piping located in the pit was capped. The filling of the pit with clean soil was completed and graded. Fence repairs made on the East side of the Fence as well as the gate on Cooper Avenue.

September 19, 2013: OSC Pellegrino is on-site to oversee activities. The lead shielding and wire mesh placement on the floor has commenced. Primo #1 Air Compressor was relocated to the front of the bay.

September 20, 2013: OSC Pellegrino is on-site to oversee activities. The lead shielding and wire mesh placement on the floor continues. Cecilia Echols (Public Affairs) visited the Site and passed out the updated fact sheet to the community.

September 22, 2013: The masons visited the site to finalize the preparation for concrete pour in Primo #1. The doors in the Terra Nova Office were raised. Terra Nova relocation of equipment continues.

September 23, 2013: The concrete pour in Primo #1 commenced. OSC Ferriola and Mazeeda Khan (EPA/RIAB) visited the site during the concrete shielding installation. Relocation of Terra Nova equipment continues.

September 24, 2013: The masons finished the concrete edges in Primo #1. The Ludlum 19 Post Shielding Gamma Survey of Primo #1 was conducted. The majority of the concrete floor readings were 50 microR/hr (\approx 33 microR/hr using PIC conversion) or lower. One area against the wall of Primo #2 had a reading of 75

microR/hr (≈50 microR/hr using PIC conversion). Tentative plans are being made for NYC and NYS representatives to survey Primo #1 with a PIC. Terra Nova relocation of equipment continues.

September 25, 2013: Cecilia Echols (Public Affairs) visited the Site and passed out the updated fact sheet to new locations in the community. Terra Nova relocation of equipment continues

September 26-27, 2013: OSC Pellegrino is on-site to oversee activities. Terra Nova relocation of equipment continues. Steel ramp materials for Primo #1 received and construction started.

September 29, 2013: Terra Nova relocation of equipment continues. Primo #1 small pit (water piping) located in the front of the bay is being shielded with lead (Pb) and concrete. Shielding specifics for the sidewalk along Irving Avenue utilizing a non-slip steel material are being developed.

September 30, 2013: Terra Nova relocation of equipment complete and concrete pour preparation commenced. After consultation with EPA and NYC Health Physicists, it was determined that a transition from 6 inches of concrete to 4 inches of concrete in the front of Primo #2 is sufficient shielding with 1/8 inches of lead (Pb). The transition will start at 19 feet from the entrance. This transition will lessen the pitch of the steel ramp.

October 01, 2013: Primo #1 Steel Ramp primer coating applied. The concrete prep and the laying of the wire mesh/lead (Pb) shielding continues in Terra Nova. The Federal Government announces shutdown. The shutdown will not affect the work at Wolff since it has been designated as Excepted.

October 02, 2013: Concrete Pour in the main area of Terra Nova. The Primo #1 Steel Ramp was painted with the non-slip coating.

October 03, 2013: OSC Pellegrino is on-site to oversee activities until 10/05/13. Cleanout of Terra Nova Office conducted. Interior office walls and floor prepped for concrete pour.

October 04, 2013: Terra Nova Office concrete poured and interior sheetrock spackled.

October 05, 2013: Terra Nova Office floor tiled. Materials ordered to replace storage closet.

October 06, 2013: Terra Nova tile grout put down. Sheetrock sanded and painted. Baseboard put up.

October 07, 2013: Terra Nova Office being finalized and the storage closet construction started. NYC Health Physicist and Weston are conducting post-shielding PIC surveys in Primo #1 and Terra Nova. Primo #1 sewer line back up. All readings were below 75 microR/hr with the exception of two areas in Primo #1 (an area in the left rear corner and one area that shares a wall with Primo #2). Both areas will be addressed.

October 08, 2013: Post shielding survey identified higher levels of gamma radiation near the left rear corner of Primo #1 (109 microR/hr with the PIC). This area was covered by a wooden stage and debris when the initial survey was conducted. Dirt and then lead (Pb) were placed inside the cinder blocks before being filled with concrete. This did not bring the gamma radiation down with a reading of 150 microR/hr with the Ludlum 19 (Approximately 100 microR/hr with the PIC conversion). The cinderblock section is now being entirely wrapped in lead and then a concrete bench poured over it to seal in the lead. The lead shielding alone provided enough to bring the reading down to 50 microR/hr using the Ludlum 19. NYC Department of Health and NYC DEP were contacted about Primo #1 sewer backup. Terra Nova storage closet construction continues.

October 09, 2013: Primo #1 framing and concrete pour in rear corner cinderblock area. Terra Nova storage closet construction continues. Post Shielding Survey diagram emailed out to the technical group. Wolff Monthly Phone Conference. OSC met with Arctic Glacier manager to discuss NYC DEP visiting area to conduct dye test from the facilities on both sides of Irving Avenue.

October 10, 2013: OSC Pellegrino overseeing site activities on 10/10/13 and 10/11/13. Overhead lighting and air compressor hookup installed in Primo #1. Equipment transfer from Primo #2 to Primo #1 started. Shelving and some supplies transferred from storage to Terra Nova.

October 11, 2013: Primo #1 compressor air line complete. Transfer of equipment continues from Primo #2 to Primo #1. NYC DEP performed dye test on sewer system. No blockage from Primo #1, Primo #2 and Terra Nova. The deli basement drains to Cooper sewer. Arctic Glacier facility (on opposite side of Irving Avenue from Primo and Terra Nova) experiencing blockage. NYC DEP will return on 10/16/13.

October 13, 2013: Transfer of equipment continues from Primo #2 to Primo #1. Expansion joints being cut into Terra Nova concrete floor.

2.1.3 Enforcement Activities, Identity of Potentially

Responsible Parties (PRPs)

The Wolff-Alport Chemical Company is the responsible party but this company went out of business in the 1950's.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

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2.2 Planning Section

2.2.1.1 Planned Response Activities

Relocate equipment from Primo #2 to Primo #1 and storage containers. Prepare Primo #2 for concrete shielding pour.

2.2.1.2 Next Steps

NYC DEP return for dye test in Arctic Glacier. Revise work schedule based on specialized steel delivery dates.

2.2.2 Issues

Federal Government Shutdown on 10/01/13 will not affect operations at Wolff Alport Site as the site work has been deemed Excepted.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

On September 25, 2012 authorization was granted by the Director of the Emergency and Remedial Response Division. A total project ceiling of \$350,000 was authorized, of which \$250,000 was for mitigation contracting.

On August 21, 2013, the Action Memorandum was signed to document the September 25, 2012 verbal authorization. This Action Memo also requested an increase of \$1,540,000, of which \$1,200,000 is for mitigation contracting. This increase raises the current total site ceiling from \$350,000 to \$1,890,000 and raises the mitigation contracting ceiling from \$250,000 to \$1,450,000. An exemption was also requested from the twelve month limitation for the duration of the removal action. Weston costs up to this point were assessment cost and not the removal cost from the action memo. The Action Memo ceiling for Weston is \$70,000. Extramural Contingency Costs are \$370,000.

On September 10, 2013, the ERRS Task Order was modified to increase the total working mitigation funding from \$250,000 to \$850,000.

On October 8, 2013, 500 hours were added to the Weston RST TDD.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$850,000.00	\$755,000.00	\$95,000.00	11.18%
TAT/START	\$180,711.17	\$82,694.96	\$98,016.21	54.24%
Intramural Costs				
USEPA - Direct	\$250,000.00	\$243,251.18	\$6,748.82	2.70%
USEPA - InDirect	\$707,912.00	\$79,428.17	\$628,483.83	88.78%
Total Site Costs				
	\$1,988,623.17	\$1,160,374.31	\$828,248.86	41.65%

* 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

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

Agency for Toxic Substances and Disease Registry (ATSDR)

United States Department of Energy (US DOE)
New York State Department of Conservation (NYS DEC)
New York State Department of Health (NYS DOH)
New York City Department of Health and Mental Hygiene (NYC DOHMH)
New York City Department of Environmental Protection (NYC DEP)

4. Personnel On Site

OSC Daly
OSC Pellegrino
Weston-One Tech
KEMRON-One RM, One Operator, Three Techs, Four Concrete Finishers and Two Welders/Tile Finishers

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.

POLREP #14 Last Updated 10/22/2020