

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Ashtabula Iron and Metal Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #2**
Progress
Ashtabula Iron and Metal Site
C5R2
Ashtabula, OH
Latitude: 41.8739139 Longitude: -80.7985901

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From: Elizabeth Nightingale, OSC
Date: 12/16/2013
Reporting Period: 12/9/13-12/13/13

1. Introduction

1.1 Background

Site Number:	C5R2	Contract Number:	
D.O. Number:		Action Memo Date:	9/25/2013
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	12/2/2013	Start Date:	12/3/2013
Demob Date:		Completion Date:	
CERCLIS ID:	OHN000510892	RCRIS ID:	OHR000042911
ERNS No.:		State Notification:	Yes
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time critical removal action.

1.1.2 Site Description

Please see initial POLREP.

1.1.2.1 Location

The site is located at 1015 West 30th Street, Ashtabula, Ashtabula County, Ohio. The location coordinates are latitude 41.874396 ° and longitude - 80.798477 °. The site is bounded by mixed industrial and residential neighborhoods in all directions.

1.1.2.2 Description of Threat

Please see initial POLREP.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Please see initial POLREP.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Hazardous substances and materials have been previously documented (or discovered upon arrival for the removal) in and around the following locations on site:

- Main Office Building
- Maintenance Building
- Former Railroad Roundhouse
- Wooden Outbuilding
- Aluminium Outbuilding
- Wooden Office Building / Lab Area

Additionally, numerous containers are located outside throughout the site. Several torn bags labeled asbestos have been identified in one central waste pile. The radium source, and one extensive pile of metal shavings with a history of spontaneous combustion will also be addressed.

2.1.2 Response Actions to Date

Week's Activities Overview

Over the week beginning December 9th, 2013 the following activities were completed:

- Revised the Health and Safety Plan
- Gathered, staged and secured containers from the former railroad roundhouse, the wooden office building/laboratory, the aluminum outbuilding, and outdoor areas near maintenance building. Chemicals removed from the lab included numerous glass containers labeled as various acids including hydrofluoric acid.
- Initiated sampling of staged containers with unknown contents
- Initiated hazcatting samples collected from unknown containers
- After ensuring compatibility, initiated bulking (combining) waste oils from small containers into larger ones for disposal

Update by geographic area:

Below is an update on the status of action for each of the focus areas on site. A map with building names and locations is available in the documents section of the website.

Uncleared buildings:

- Maintenance Building - Not cleared. This building is being used as the chemical staging area and chemical identification/characterization lab.
- Former Railroad Roundhouse - Partially Cleared. Containers have been removed from building, and secured and staged at staging area. Radium source remains in building (secured in lead container) - EPA Health Physicist is handling disposal of this source

Fully Cleared Buildings:

- Main Office Building - Containers have been removed from building, and secured and staged at staging area
- Wooden Outbuilding - Containers have been removed from building, and secured and staged at staging area
- Aluminium Outbuilding - Containers have been removed from building, and secured and staged at staging area
- Wooden Office Building / Lab Area - Containers have been removed from building, and secured and staged at staging area

Outside Areas:

- Bags labeled asbestos - not yet addressed
- Metal shavings pile complex - not yet addressed
- Small containers and drums outside throughout site - collection of containers is ongoing
- Rolloffs with hazardous constituents - not yet addressed
- Large ground transformer - not yet addressed

Air Monitoring and Sampling:

Air monitoring began on 12/2/13, and will be conducted every day work is ongoing on site. During the week of 12/9/13, no exceedances of any site action levels were detected, except for briefly elevated carbon monoxide levels in the maintenance building (carbon monoxide approximately 80 ppm). This was rectified by placing the generator outdoors, which reduced the carbon monoxide to undetectable levels.

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

General notice and 104(e) letters were issued to multiple potentially responsible parties in September 2012. Investigation is ongoing.

2.1.4 Progress Metrics

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

2.2 Planning Section

2.2.1 Anticipated Activities

Planned removal activities on-site include:

- a) Developing and implementing a site-specific Health and Safety Plan, including an Air Monitoring Plan, and a site Emergency Contingency Plan;
- b) Developing and implementing a Site Work Plan that includes a Site Security Plan;
- c) Securing, characterizing, and sampling known and suspected hazardous substances, contained or uncontained, at the site;
- d) Consolidating and packaging hazardous substances, pollutants and contaminants for transportation and off-site disposal;
- e) Decontaminating contaminated structures as necessary;
- f) Transporting and disposing of all characterized or identified hazardous substances, pollutants, wastes, or contaminants that pose a substantial threat of release (except NORM) at a Resource Conservation and Recovery Act/CERCLA-approved disposal facility in accordance with EPA's Off-site Rule (40 C.F.R. § 300.440), as applicable;
- g) Removing and reusing or disposing of NORM in accordance with CERCLA and with all applicable state regulations; and
- h) Taking any other response actions to address any release or threatened release of a hazardous substance, pollutant and contaminant that the U.S. EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.

Additional site activities may include security, perimeter air monitoring, and decontamination on the site, as needed to complete the removal action.

2.2.1.1 Planned Response Activities

Please see above.

2.2.1.2 Next Steps

Next week, work to categorize unknown substances, identify disposal waste streams, collect samples of waste streams, overpack containers and prepare waste for disposal will continue.

2.2.2 Issues

None.

2.3 Logistics Section

ERRS is managing logistics.

2.4 Finance Section

2.4.1 Narrative

ERRS costs are estimated through December 13, 2013. START costs are estimated through December 13, 2013.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$450,000.00	\$63,802.29	\$386,197.71	85.82%
TAT/START	\$25,000.00	\$11,318.00	\$13,682.00	54.73%
Intramural Costs				
Total Site Costs	\$475,000.00	\$75,120.29	\$399,879.71	84.19%

* 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

OSC is serving in this role.

2.5.2 Liaison Officer

OSC is serving in this role.

2.5.3 Information Officer

OSC is serving in this role.

3. Participating Entities

3.1 Unified Command

n/a

3.2 Cooperating Agencies

OEPA

ODH

Ashtabula Fire Department

First Energy

4. Personnel On Site

12/9/13

EPA: 1

ERRS: 5

START: 1

OEPA: 0

Liberty (OEPA Tire Removal Contractor): 0

12/10/13

EPA: 1

ERRS: 5

START: 1

OEPA: 2

Liberty (OEPA Tire Removal Contractor): 1

12/11/13

EPA: 1

ERRS: 5

START: 1

OEPA: 0

Liberty (OEPA Tire Removal Contractor): 0

12/12/13

EPA: 1

ERRS: 5

START: 1

OEPA: 0

Liberty (OEPA Tire Removal Contractor): 0

12/13/13

EPA: 2

ERRS: 5
START: 1
OEPA: 1
Liberty (OEPA Tire Removal Contractor): 0

5. Definition of Terms

ATSDR	Agency for Toxic Substances and Disease Registry
BZ	Breathing Zone
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
DNR	Department of Natural Resources
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
ERRS	Emergency and Rapid Response Service
NG/M ³	nanograms per cubic meter
NCP	National Oil and Hazardous Substance Pollution Contingency Plan
NOAA	National Oceanic and Atmospheric Administration
NPL	National Priorities List
NRC	National Response Center
OEPA	Ohio Environmental Protection Agency
ODH	Ohio Department of Health
OSC	On Scene Coordinator
PPE	Personal Protective Equipment
PPM	Parts per million
RCRIS	Resource Conservation and Recovery Act Information System
RP	Responsible Party
RRT	Regional Response Team
START	Superfund Technical Assessment and Response Team
US FWS	United States Fish and Wildlife Service
USCG	United States Coast Guard

6. Additional sources of information

6.1 Internet location of additional information/report
epaossc.org/aim

6.2 Reporting Schedule
POLREPs will be issued weekly during weeks when onsite activities occur.

7. Situational Reference Materials

n/a