

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #3
Progress
Ashtabula Iron and Metal Site
C5R2
Ashtabula, OH
Latitude: 41.8739139 Longitude: -80.7985901

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From: Elizabeth Nightingale, OSC
Date: 12/19/2013
Reporting Period: 12/16/2013-12/19/2013

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 had been previously documented (or were 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 were located outside throughout the site. Several torn bags labeled asbestos were 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 through this action.

2.1.2 Response Actions to Date

Week's Activities Overview

Over the week beginning December 16th, 2013 the following activities were completed:

- Completed sampling of staged containers with unknown contents
- Completed hazcatting samples collected from unknown containers to categorize contents for disposal
- After ensuring compatibility, continued and completed bulking (combining) of select wastes from small containers into larger ones for disposal
- Initiated and completed the majority of overpacking of small containers and 55 gallon drums of waste into 85 gallon drums for disposal
- Generated and submitted samples of disposal waste streams for laboratory analysis
- Secured the site, the buildings containing hazardous waste, and posted site perimeter with additional no trespassing signs

All known hazardous substance containers have been collected from throughout the site and secured within the maintenance building (except the radium, which is secured in a lead container within the railroad roundhouse, and one drum outside the maintenance building). The majority of the containers have been packaged for disposal pending receipt of sample analysis results. Several non-containerized waste streams that are located outside still need to be addressed (see below).

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/container staging area.
- Former Railroad Roundhouse - Partially Cleared. Containers have been removed from building, 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 (all containers of hazardous substances have been removed from these buildings):

- Main Office Building
- Wooden Outbuilding
- Aluminium Outbuilding
- Wooden Office Building / Lab Area

Outside Areas:

- Bags labeled asbestos - not yet addressed
- Metal shavings pile complex - not yet addressed
- Small containers and drums outside throughout site - collected, staged and prepared for disposal
- Rolloffs with hazardous constituents - not yet addressed
- Large ground transformer - scheduled for removal by First Energy
- Pole mounted transformers - removed by First Energy

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 12/16/13, no exceedances of any site action levels were detected. Elevated volatile organic carbon (VOC) levels of up to 18 PPM were detected at points during hazardous categorization and bulking, but workers were wearing appropriate levels of PPE. When these activities were completed, the VOCs went down to 0 PPM.

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>
Pole Mounted Transformers	Liquid - within pole mounted transformers	6			x
Recyclables	Solid	2 large boxes		x	

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

Over the next few weeks, we will work offsite to coordinate disposal of staged waste. As soon as disposal has been coordinated, we will return to site, and ship the staged waste for proper disposal. We anticipate that disposal will be fully arranged in mid-February.

When we return in February, we will also properly dispose of the metal shavings pile that has combusted, the empty drums and small containers, the rolloff(s) – 1 or 2 pending analytical results, the asbestos waste that is outside in the center of the site, and other hazardous substances as necessary.

EPA's Health Physicist anticipates returning to the site the week of 1/20/14 to collect and properly dispose

of the radium source from the roundhouse.

First Energy has taken 6 pole mounted transformers offsite, and anticipates returning next week to remove and properly dispose of the ground level transformer.

While we are off site, our technical contractor will visit the site weekly to verify that the site and the wastes are still secure. OEPA will also do periodic inspections over that period as well.

Keys to the buildings and the gate have been left with the Ashtabula Fire Chief, and OEPA in case of emergency.

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 19, 2013. START costs are estimated through December 20, 2013.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$450,000.00	\$82,848.00	\$367,152.00	81.59%
TAT/START	\$25,000.00	\$16,372.00	\$8,628.00	34.51%
Intramural Costs				
Total Site Costs	\$475,000.00	\$99,220.00	\$375,780.00	79.11%

* 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

12/16/13

EPA: 2

ERRS: 6

START: 1

OEPA: 0

Liberty (OEPA Tire Removal Contractor): 3

12/17/13

EPA: 1

ERRS: 6

START: 1

OEPA: 1
Ashtabula Fire Department: 1
Liberty (OEPA Tire Removal Contractor): 3

12/18/13
EPA: 1
ERRS: 6
START: 1
OEPA: 0
Ashtabula Fire Department: 1
Liberty (OEPA Tire Removal Contractor): 3

12/19/13
EPA: 1
ERRS: 5
START: 1
OEPA: 1
Liberty (OEPA Tire Removal Contractor): 3

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/M³ 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
epaosr.org/aim

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

7. Situational Reference Materials

n/a

POLREP #3 Last Updated 12/19/2013