

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #4
Progress
Ashtabula Iron and Metal Site
C5R2
Ashtabula, OH
Latitude: 41.8739139 Longitude: -80.7985901

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From: Elizabeth Nightingale, OSC
Date: 3/3/2014
Reporting Period: 2/24/14-2/28/14

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 February 24th, 2014 the following activities were completed:

- Crew remobilized to site
- Continued to arrange for disposal of staged wastes
- Completed overpacking of small containers for disposal
- Initiated shipping of metal shavings piles offsite for proper disposal
- Generated and submitted sample of soil from below metal shavings piles for laboratory analysis
- Decommissioned cylinders found on site
- Conducted radiation survey of building on southern property (ODH lead)

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). All 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).

While removing the piles of metal shavings from the property we discovered an area of soil that appears to be heavily stained with waste oil beneath the shavings piles with a strong odor. We sampled this soil and sent the sample to the lab for analysis.

Ohio Department of Health (ODH) completed a radiation survey of the utility building on the Southern property based on elevated readings that we got during the site assessment. ODH determined that a naturally occurring radioactive material was present in some of the bricks used in the building, but not at levels of concern.

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. Disposal is scheduled for the week of 3/3/14.
- 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. Disposal scheduled for 3/3/14.

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
- Utility Building on southern property

Outside Areas:

- Bags labeled asbestos - not yet addressed. Removal scheduled for the week of 3/3/14.
- Metal shavings pile complex -majority shipped off site for proper disposal on 2/27/14 and 2/28/14. Remainder will be shipped next week.
- Soil below former metal shavings pile - sampled; results pending
- Small containers and drums outside throughout site - collected, staged and prepared for disposal. Disposal scheduled for the week of 3/3/14.
- Rolloff with hazardous constituents - emptied into shippable rolloffs. Disposal scheduled for the week of 3/3/14.
- Large ground transformer - removed 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 2/24/13, no exceedances of any site action levels were detected.

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 2013. Investigation is ongoing.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Pole Mounted Transformers	Liquid - within pole mounted transformers	6			x
Recyclables	Solid	2 large boxes		x	
Large Ground Transformer	Liquid	1			x
Metal Shavings	Solid		319002		x
Metal Shavings	Solid		319003		x
Metal Shavings	Solid		319004		x
Metal Shavings	Solid		319005		x
Metal Shavings	Solid		319006		x
Metal Shavings	Solid		319007		x
Metal Shavings	Solid		319008		x
Metal Shavings	Solid		319009		x
Metal Shavings	Solid		319010		x
Metal Shavings	Solid		319011		x
Metal Shavings	Solid		319012		x
Metal Shavings	Solid		319013		x

2.2 Planning Section**2.2.1 Anticipated Activities**

Planned removal activities on-site included:

- 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 planned site activities, if needed, included 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 week, we will work to dispose of staged waste, asbestos piles, rollofs, and non-hazardous waste. We anticipate that disposal of these wastes will be completed the week of March 3, 2014.

EPA's Health Physicist anticipates returning to the site the week of 3/3/14 to collect and properly dispose of the radium source from the roundhouse.

We will also receive soil sampling results back for the soil below the metal shavings piles. Next steps for that area will be evaluated upon review of results.

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 February 27, 2014. START costs are estimated through February 28, 2014.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$450,000.00	\$140,041.00	\$309,959.00	68.88%
TAT/START	\$25,000.00	\$23,370.00	\$1,630.00	6.52%
Intramural Costs				
Total Site Costs	\$475,000.00	\$163,411.00	\$311,589.00	65.60%

* 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

2/25/14

EPA: 0

ERRS: 5

START: 1

2/26/14

EPA: 1

ERRS: 5

START: 1
Ashtabula Fire Department:1

2/27/14
EPA: 1
ERRS: 5
START: 1
OEPA: 1
Ashtabula Fire Department:1

2/28/14
EPA: 1
ERRS: 5
START: 1
ODH: 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/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

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 #4 Last Updated 3/3/2014