

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #6  
Progress  
Ashtabula Iron and Metal Site  
C5R2  
Ashtabula, OH  
Latitude: 41.8739139 Longitude: -80.7985901

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**From:** Elizabeth Nightingale, OSC  
**Date:** 4/7/2014  
**Reporting Period:** 3/31/14-4/4/14

**1. Introduction**

**1.1 Background**

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

**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; one extensive pile of metal shavings that contained hazardous substances and had a history of spontaneous combustion; waste oil contaminated soils and a leaking underground storage tank that contained unknown oily waste were also addressed through this action.

#### **2.1.2 Response Actions to Date**

##### **Week's Activities Overview**

**Over the week beginning March 31st, 2014 the following activities were completed:**

- Initiated excavation and disposal of contaminated soil that is below former metal shavings piles. Soil is contaminated with waste oil and has a strong odor.
- Initiated and completed pump out of unknown waste material from the underground storage tank that was discovered just north of the aluminum outbuilding. Waste was shipped off site for proper disposal.
- Initiated excavation and disposal of contaminated soil that surrounded underground storage tank. Tank appears to have leaked into surrounding soil.

##### **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:  
None

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
- Former Railroad Roundhouse
- Maintenance Building

Outside Areas Addressed:

- Bags labeled asbestos - Removed the week of 3/3/14.
- Metal shavings pile complex - Completed shipping of metal shavings piles that contained hazardous substances and had a history of spontaneous combustion offsite for proper disposal on 3/4/14.
- Small containers and drums outside throughout site - shipped for disposal during the week of 3/3/14.
- Rolloff with hazardous constituents - emptied into shippable rolloffs. Shipped offsite for disposal on 3/3/14 and 3/5/14.
- Large ground transformer - removed by First Energy
- Pole mounted transformers - removed by First Energy

Outside areas not yet fully addressed:

- Stained soil below former metal shavings pile. Sampled; results indicated soil contains hazardous substances and elevated levels of total petroleum hydrocarbons. Because this soil is now exposed and sits next to a storm drain that flows directly to the Ashtabula river, we are excavating the soil that we exposed, backfilling with clean fill and reseeding.
- Buried underground storage tank next to the wooden outbuilding. Tank was discovered during last mobilization. It appears that the tank has leaked into the surrounding soil, and may have originally been used to heat the nearby building. Because this tank and waste oil contaminated soil also sit next to a storm drain that flows directly to the Ashtabula river, we plan to empty the tank, render it unusable, and leave it in place. We will also excavate the area around the tank, and remove contaminated soil, properly dispose of it and replace it with clean fill.

##### **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 3/31/14, no exceedances of any site action levels were detected.

A MultiRae was used to monitor volatile organic carbon levels while pumping out the underground storage tank and excavating the soil around it. There were no exceedances of action levels within the breathing zone.

Particulate Daily Averages (measured via upwind and down wind datarams):

**4/1/14**

Downwind: 7.70 ug/m<sup>3</sup> Max: 93.2 ug/m<sup>3</sup> @ 10:51

Upwind: 5.93 ug/m<sup>3</sup> Max: 22.4 ug/m<sup>3</sup> @ 13:51

\*No exceedences of action level 1.5 mg/m<sup>3</sup>

**4/2/14**

Downwind: 17.9 ug/m<sup>3</sup> Max: 562.4 ug/m<sup>3</sup> @ 12:25

Upwind: 16.6 ug/m<sup>3</sup> Max: 821.3 ug/m<sup>3</sup> @ 15:07

\*No exceedences of action level 1.5 mg/m<sup>3</sup>

**4/3/14**

Downwind: 19.3 ug/m<sup>3</sup> Max: 70.4 ug/m<sup>3</sup> @ 10:48

Upwind: 18.0 ug/m<sup>3</sup> Max: 29.9 ug/m<sup>3</sup> @ 0759

\*No exceedences of action level 1.5 mg/m<sup>3</sup>

\*Data Rams were turned off and put inside at 1430 due to rain in the vicinity.

**4/4/14**

\*Data Rams not used due to rain.

**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 #	Disposal	Reuse
Aerosols Flammable	Gas	3600 pounds	12735476 JJK	x	
Asbestos containing material	Solid	1 ton	204663SB	x	
Broken Glass, Non Hazardous	Solid	450 pounds	12735475 JJK	x	
Formic Acid	Liquid	25 pounds	12735476 JJK	x	
Hazardous Debris	Solid	1 - 20 cyd roll off	12735410 JJK	x	
Hazardous Debris	Solid	1 - 20 cyd roll off	12735411 JJK	x	
Hazardous Waste Liquid	Liquid	4050 pounds	12735475 JJK	x	
Hazardous Waste Liquid	Liquid	5400 pounds	12735476 JJK	x	
Hazardous Waste Solid (Mercury Contaminated Glass)	Solid	450 pounds	12735475 JJK	x	
Hydrochloric Acid	Liquid	400 pounds	12735476 JJK	x	
Large Ground Transformer	Liquid	1		x	
Liquid Labpack, Non Hazardous	Liquid	7200 pounds	12735475 JJK	x	
Metal and waste oil contaminated soil	Solid	20 tons	001	x	
Metal and waste oil contaminated soil	Solid	20 tons	002	x	
Metal and waste oil contaminated soil	Solid	20 tons	003	x	
Metal and waste oil contaminated soil	Solid	20 tons	004	x	
Metal and waste oil contaminated soil	Solid	20 tons	005	x	
Metal and waste oil contaminated soil	Solid	20 tons	006	x	
Metal and waste oil contaminated soil	Solid	20 tons	007	x	
Metal and waste oil contaminated soil	Solid	20 tons	008	x	
Metal and waste oil contaminated soil	Solid	20 tons	009	x	
Metal and waste oil contaminated soil	Solid	20 tons	010	x	
Metal and waste oil contaminated soil	Solid	20 tons	011	x	
Metal and waste oil contaminated soil	Solid	20 tons	012	x	
Metal and waste oil contaminated soil	Solid	20 tons	013	x	
Metal and waste oil contaminated soil	Solid	20 tons	014	x	
Metal and waste oil contaminated soil	Solid	20 tons	015	x	
Metal and waste oil contaminated soil	Solid	20 tons	016	x	
Metal and waste oil contaminated soil	Solid	20 tons	017	x	
Metal and waste oil contaminated soil	Solid	20 tons	018	x	
Metal and waste oil contaminated soil	Solid	20 tons	019	x	
Metal and waste oil contaminated soil	Solid	20 tons	020	x	
Metal and waste oil contaminated soil	Solid	20 tons	021	x	

Metal and waste oil contaminated soil	Solid	20 tons	022	x	
Metal and waste oil contaminated soil	Solid	20 tons	023	x	
Metal and waste oil contaminated soil	Solid	20 tons	024	x	
Metal and waste oil contaminated soil	Solid	20 tons	025	x	
Metal and waste oil contaminated soil	Solid	20 tons	026	x	
Metal containing waste	Solid	20 tons	319002	x	x
Metal containing waste	Solid	20 tons	319003	x	
Metal containing waste	Solid	20 tons	319004	x	
Metal containing waste	Solid	20 tons	319005	x	
Metal containing waste	Solid	20 tons	319006	x	
Metal containing waste	Solid	20 tons	319007	x	
Metal containing waste	Solid	20 tons	319008	x	
Metal containing waste	Solid	20 tons	319009	x	
Metal containing waste	Solid	20 tons	319010	x	
Metal containing waste	Solid	20 tons	319011	x	
Metal containing waste	Solid	20 tons	319012	x	
Metal containing waste	Solid	20 tons	319013	x	
Metal containing waste	Solid	20 tons	319014	x	
Metal containing waste	Solid	20 tons	319015	x	
Non Hazardous Debris	Solid	20 tons	319027	x	
Non Hazardous Debris	Solid	20 tons	319028	x	
Non Hazardous Debris	Solid	20 tons	319029	x	
Non Hazardous Debris	Solid	20 tons	319033	x	
Non Hazardous Debris	Solid	1 roll off (1 ton est)	319034	x	
Paint Related Material	Liquid	4050 pounds	12735476 JJK	x	
Pole Mounted Transformers	Liquid	6		x	
Radium 226	Solid	1 coin		x	
Recyclables	Solid	4 large boxes full			x
Waste Acetic Acid	Liquid	25 pounds	12735476 JJK	x	
Waste Corrosive Liquid, Acidic, Inorganic (Chromic Acid)	Liquid	450 pounds	12735476 JJK	x	
Waste Flammable Liquid (Gasoline)	Liquid	2250 pounds	12735475 JJK	x	
Waste Flammable Liquid (Methanol)	Liquid	450 pounds	12735476 JJK	x	
Waste Flammable Liquids (Wood Stain)	Liquid	25 pounds	12735476 JJK	x	
Waste Grease, Non Hazardous	Liquid	450 pounds	12735475 JJK	x	
Waste Hydrofluoric Acid	Liquid	25 pounds	12735476 JJK	x	
Waste Inorganic Liquid, Non Hazardous	Liquid	2250 pounds	12735476 JJK	x	
Waste Inorganic Solid, Non Hazardous	Solid	900 pounds	12735475 JJK	x	
Waste Latex Paint, Non Hazardous	Liquid	450 pounds	12735476 JJK	x	
Waste Nitric Acid	Liquid	50 pounds	12735476 JJK	x	
Waste Oil, Non Hazardous	Liquid	9450 pounds	12735475 JJK	x	
Waste Organic Liquid, Non Hazardous	Liquid	450 pounds	12735475 JJK	x	
Waste Solid Labpack, Non Hazardous	Solid	900 pounds	12735476 JJK	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 complete work to address the leaking underground storage tank next to the wooden outbuilding; and complete work to address the contaminated soil that we exposed earlier in the removal action. Our last day on site is anticipated to be April 11, 2014.

**2.2.2 Issues**

Over the course of the removal action at this facility, we obtained additional information about site history and subsurface site conditions that leads us to believe that there may be a layer of contaminated soil below the site surface. As described previously, when we removed a pile of metal shavings along the western site boundary we uncovered waste oil contaminated soil. While we were excavating in the center of the site to remove asbestos containing material, we also uncovered waste oil contaminated soil with a strong odor about 2 feet below surface. A former employee stopped by and stated that metal shavings processing was the primary focus of the business on site for many decades, and oily metal shavings piles covered the entire site. A historical aerial photo that we found shows many piles of metal shavings across the site. This available information leads us to believe that waste oil from oily metal shavings piles may have migrated into the ground, and may exist subsurface across the site. Therefore, at the completion of the EPA time critical removal action, EPA will refer the site back to the Ohio EPA for further consideration.

**2.3 Logistics Section**

ERRS is managing logistics.

**2.4 Finance Section**

**2.4.1 Narrative**

ERRS costs are estimated through April 3, 2014. START costs are estimated through April 4, 2014.

**Estimated Costs \***

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$450,000.00	\$302,745.00	\$147,255.00	32.72%
TAT/START	\$45,000.00	\$33,186.00	\$11,814.00	26.25%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$495,000.00</b>	<b>\$335,931.00</b>	<b>\$159,069.00</b>	<b>32.14%</b>

\* 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

3/31/14  
EPA: 0  
ERRS: 1  
START: 0

4/1/14  
EPA: 1  
ERRS: 5  
START: 1  
City of Ashtabula: 1

4/2/14  
EPA: 1  
ERRS: 5  
START: 1  
OEPA: 2

4/3/14  
EPA: 1  
ERRS: 5  
START: 1

4/4/14  
EPA: 1  
ERRS: 5  
START: 1

#### 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<sup>3</sup> 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](http://epaossc.org/aim)

##### 6.2 Reporting Schedule

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

#### 7. Situational Reference Materials

n/a