

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
St Lawrence and Atlantic Railroad - Removal Polrep
Initial and Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I

Subject: POLREP #1
First and Final POLREP
St Lawrence and Atlantic Railroad

North Stratford, NH
Latitude: 44.7521279 Longitude: -71.6309452

To:
From: Michael Nalipinski, FOSSC
Date: 4/11/2014
Reporting Period: July 23, 2013 to April 14, 2014

1. Introduction

1.1 Background

Site Number:	Contract Number:
D.O. Number:	Action Memo Date:
Response Authority: CERCLA	Response Type: PRP Oversight
Response Lead: PRP	Incident Category: Removal Action
NPL Status: Non NPL	Operable Unit:
Mobilization Date: 7/29/2013	Start Date: 7/23/2013
Demob Date: 12/2/2013	Completion Date: 4/14/2014
CERCLIS ID:	RCRIS ID:
ERNS No.:	State Notification: NHDES #20121015
FPN#: N/A	Reimbursable Account #:

1.1.1 Incident Category

Oversight of a Time Critical Removal Action conducted by the Responsible Party (RP) under New Hampshire Department of Environmental Services (NH DES) enforcement authorities. EPA conducted reviews of the railroad's plans, facilitated meetings during which response actions were negotiated (between NH DES and the railroad), and conducted occasional field visits. EPA's involvement resulted in the railroad adequately completing appropriate response actions without entering into the EPA enforcement process.

1.1.2 Site Description

The St. Lawrence & Atlantic Railroad owns and operates a rail line located along a railroad corridor that runs through the Town of North Stratford, NH and includes a railroad bridge that crosses the Connecticut River and continues to the Town of Bloomfield, VT. The railroad bridge is constructed on steel girders that span the river on several granite rock abutments and one steel-framed support. The deck of the bridge consisted of creosote-treated railroad ties that weeped into the Connecticut River.

1.1.2.1 Location

The eastern side of railroad bridge originates in the center of North Stratford, NH, spans the Connecticut River for approximately 100 yards, and enters a residential area in Bloomfield, VT. The geographic coordinates for the site are: latitude 44.7521279 and longitude -71.6309452.

1.1.2.2 Description of Threat

In April of 2008 the NH DES became aware of substantial amounts of creosote from the railroad ties on the bridge decking dripping into the Connecticut River. The bridge abutments are on both the NH and VT banks necessitating coordination between the two states. Stained soil was observed on the banks and sheens were documented in the river. NH DES worked with the railroad using various enforcement instruments. NH DES requested assistance from the EPA on March 7, 2013 to expedite clean up activities.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See Section 1.1.2.2.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

The St. Lawrence & Atlantic Railroad and the NH DES have been working through administrative and field

activities necessary to eliminate the threat to the Connecticut River and the adjacent river banks since April 2008.

The railroad initiated gross removal of creosote from the bridge by vactoring the ties in July 2013. Replacement of the ties was initiated and completed from August 5 to 15, 2013. Washing of the granite bridge abutments and soil removal from the banks concluded in November of 2013. The soil was excavated to below NH DES Soil Remediation Standards for PAHs. During the aforementioned activities booms were placed in the river to minimize the release of creosote sheens and sedimentation.

The site restoration/stabilization activities were installed, maintained and determined to be effective by EPA and the NH DES during site visits which occurred in the winter/spring of 2013/14.

The railroad submitted, and NH DES accepted (after consultation with EPA), the "Remedial Action Implementation Report" prepared by Drumlin Environmental, LLC. The remedial action report is included in the documents section of the www.epaosc.org/STLawrenceRailroad website.

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

The St. Lawrence & Atlantic Railroad accepted responsibility for implementing response actions necessary to mitigate the creosote releases to the Connecticut River and river banks in NH and VT. EPA provide technical support to NH DES during negotiations with the railroad, by reviewing documents and attending site visits.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Railroad ties		500		biomass	incineration
Soil		7.66 tons			landfill
Boom and vactor material		10 yds			landfill

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

NH DES will evaluate the areas along the river banks to ensure they area adequately stabilized and in compliance with the NH Wetlands Permit.

2.2.1.2 Next Steps

None.

2.2.2 Issues

None.

2.3 Logistics Section

None.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

The railroad controlled all access to the site during the response activities because the rail line remained operational during the removal action.

2.5.2 Liaison Officer

2.5.3 Information Officer

The NH DES was the lead Public Information Officer for this removal action. Several interviews with the local media occurred during the removal action.

3. Participating Entities

3.1 Unified Command

The NH DES was the lead agency providing frequent and direct oversight of the railroads activities.

3.2 Cooperating Agencies

The EPA FOOSC and the Vermont Department of Environmental Conservation staff attended meetings and conducted field oversight during this action.

4. Personnel On Site

There are currently no personnel on-site, as the removal action has been completed.

5. Definition of Terms

N/A.

6. Additional sources of information

6.1 Internet location of additional information/report

6.2 Reporting Schedule

No further reports are anticipated relative to this removal action.

7. Situational Reference Materials

N/A.