

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #7
Final
Ashtabula Iron and Metal Site
C5R2
Ashtabula, OH
Latitude: 41.8739139 Longitude: -80.7985901

To:
From: Elizabeth Nightingale, OSC
Date: 4/14/2014
Reporting Period: 4/7/14-4/11/14

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:	4/11/2014	Completion Date:	4/11/2014
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 during the removal action) 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 April 7th, 2014 the following activities were completed:

- Completed excavation and disposal of contaminated soil that was below metal shavings piles along the western property boundary removed through this action. Soil was contaminated with waste oil and had a strong odor. Area was backfilled with clean fill and seeded.
- Completed excavation and disposal of contaminated soil that surrounded underground storage tank. Tank had leaked into surrounding soil. Tank was destroyed to prevent reuse and left in place. Area was backfilled with clean fill and seeded.

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. A map depicting the outdoor areas addressed through this action will be available in the final project report (currently in development).

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
- Contaminated soil below area where metal shavings were removed.
- Area surrounding buried underground storage tank next to the wooden outbuilding.

Air Monitoring and Sampling:

Air monitoring began on 12/2/13, and was conducted every day work was ongoing on site (conditions permitting).

During the week of 4/7/14, rainy conditions did not permit deployment of datarams. 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.

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	
Contaminated Water (UST)	Liquid	698 gallons	296697	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	

Non Hazardous Debris	Solid	20 tons	319033	x	
Non Hazardous Debris	Solid	1 roll off (1 ton est)	319034	x	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 Contaminated Soil (UST)	Solid	22 tons	100	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	

Regional Metrics		
This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored	0
	Cubic yards of contaminated sediments removed and/or capped	0
	Gallons of oil/water recovered	698 gallons
	Acres of soil/sediment cleaned up in floodplains and riverbanks	0
Stand Alone Assessment	Number of contaminated residential yards cleaned up	0
	Number of workers on site	7
Contaminant(s) of Concern	various acids, corrosives, flammable liquids and solids, leachable lead containing waste, radium, metal containing waste, waste oil, and others	
Oil response Tracking		
Estimated volume	Initial amount released	N/A
	Final amount collected	N/A
CANAPS Info	FPN Ceiling Amount	N/A
	FPN Number	N/A
	Body of Water affected	N/A
Administrative and Logistical Factors (Check X where applicable)		
Precedent-Setting HQ Consultations (e.g., fracking, asbestos)	Community challenges or high involvement	x Radiological
x More than one PRP	Endangered Species Act / Essential Fish Habitat issues	Explosives
AOC	Historic preservation issues	Residential impacts

UAO	NPL site	Relocation
DOJ involved	Remote location	Drinking water impacted
Criminal Investigation Division involved	Extreme weather or abnormal field season	Environmental justice
Tribal consultation or coordination or other issues	Congressional involvement	High media interest
Statutory Exemption for \$2 Million	Statutory Exemption for 1 Year	Active fire present
x Hazmat Entry Conducted – Level A, B or C	Incident or Unified Command established	Actual air release (not threatened)

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

Our last day on site was April 11, 2014.

Over the course of the removal action at this facility, we obtained additional information about site history and subsurface site conditions that led 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.

2.2.2 Issues

Please see above.

2.3 Logistics Section

ERRS managed logistics.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

OSC served in this role.

2.5.2 Liaison Officer

OSC served in this role.

2.5.3 Information Officer

OSC served 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

4/7/14
EPA: 1
ERRS: 5
START: 1

4/8/14
EPA: 1
ERRS: 5
START: 1

4/9/14
EPA: 1
ERRS: 5
START: 1

4/10/14
EPA: 1
ERRS: 5
START: 1

4/11/14
EPA: 0
ERRS: 5
START: 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

Reporting is complete for this action.

7. Situational Reference Materials

n/a