U.S. ENVIRONMENTAL PROTECTION AGENCY POLLUTION/SITUATION REPORT WESTLINE - Removal Polrep Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Region III

Subject: POLREP #1

Initial WESTLINE

WESTLINE, PA

Latitude: 41.7742780 Longitude: -78.7719440

To:

From: Vincent Zenone, OSC

Date:

Reporting Period: July 2014 to August 2016

1. Introduction

1.1 Background

Site Number: 0355 Contract Number:

D.O. Number: Action Memo Date: 8/17/2016

Response Authority: CERCLA Response Type: Time-Critical

Response Lead: EPA Incident Category: Removal Action

NPL Status: Non NPL Operable Unit:

Mobilization Date: Start Date: 8/17/2016

Demob Date: Completion Date:

CERCLIS ID: RCRIS ID:

ERNS No.: State Notification:

FPN#: Reimbursable Account #:

1.1.1 Incident Category

Removal Assessment / Removal Action

1.1.2 Site Description

The Westline Site (EPA ID# PAD980692537) was a 40-acre located on the northern side of Westline, McKean County, Pennsylvania. During the first half of the 1900s, a lumber processing plant operated on the site. Its chemical plant converted lumber into charcoal, methanol, and acetic acid. In 1952, a fire and explosion caused the facility to close. The owners left the plant's foundation, demolition debris, and a tarlike production waste containing high levels of polycyclic aromatic hydrocarbons (PAHs). This waste material was disposed of, or flowed into, natural or excavated depressions located hundreds of feet away within the town. The site encompassed most of Westline and its adjacent streams, including Kinzua Creek and Turnip Run. The dispersed waste tar deposits were up to nine feet thick. A 1,500-square-foot, six inch thick deposit was removed from behind the Westline Church; an even larger deposit was removed in 1983. Plant-related contaminants were detected mainly in surface soils. Some byproducts of petroleum, such as benzene were detected in groundwater at the Site, but as of 1988, drinking water supply wells were no longer being used. Westline now uses an unpolluted spring for its water supply. This spring is north of the town. The surrounding area is rural, and the town is surrounded by the Allegheny National Forest. Westline has a small, permanent resident population of about 100, which increases seasonally. Hunting and fishing camps are located throughout the town.

The Westline Site was deleted from the National Priorities List in 1992.

In the Fall of 2013, a the owner of a seasonal residence in Westline hired a contractor to install a new driveway from Westline Road onto the property. The area for the driveway was cleared of trees and shrubbery, and the contractor informed the landowner that deposits of a tar substance were observed in the area where the driveway was installed. In the Spring of 2014, the landower had an opportunitity to visit the seasonal residence and observed wood tar seeping to the surface from areas on both sides of the new driveway. After researching the history of the Westline Superfund Site, on July 15, 2014, the landowner contacted the EPA On-Scene Coordinator (OSC) and requested assistance.

1.1.2.1 Location

the portion of the Westline Site subject to the removal assessment was designated as "Area B" during the previous Remedial Action at the Westline Site. Kinzua Creek delineates the southeastern and southern border of the Westline Site .

1.1.2.2 Description of Threat

The Day Chemical Company deposited wood tar material containing phenolic compounds and PAHs into onsite lagoons and into small canals that allowed the material to migrate downhill towards the banks of Kinzua Creek. The site was discovered in July of 1982 during a routine inspection of oil operations in the Allegheny National Forest.

Analysis of the wood tar showed that phenol and 2, 4-dimethylphenol were present at approximately 1,000 mg/k each. Both of these compounds, listed as CERCLA hazardous substances, present in the wood tar deposits, posed a threat to people who come in direct contact with, inhale, or ingest wood tar or wood tar contaminated materials. The dominant and most widely distributed contaminants detected in the soils were polycyclic aromatic hydrocarbons (PAHs). In addition to the direct contact threat to public health, the town is located in a 100-year flood plain, therefore, areas containing wood tar could be subject to erosion if a flood occurs, possibly causing contaminants to enter Kinzua Creek, a tributary to the Allegheny Reservoir.

The Westline Site was added to the NPL on September 8, 1983. Through a 1986 Record of Decision (ROD), EPA conducted a remedial action and addressed the remediation of wood tar and contaminated soil found in an onsite wood tar pit and in some of the interspersed wood tar deposits along Kinzua Creek.

In the early 1990s, although significant contamination remained, EPA determined that the residual contaminated soil and wood tar material remaining onsite presented no potential carcinogenic risk greater than the range of acceptable risks found at other Superfund sites, based on an updated risk assessment using more recent risk criteria for PAHs. Thus the excavation and offsite incineration and disposal of waste from an onsite wood tar pit and the interspersed wood tar deposits along Kinzua Creek was discontinued as the Westline Site had been cleaned up to levels that did not pose a threat to public health or the environment. The selected remedial action for the 1990 ROD amendment was "no further action". Because some wood tar material remained onsite, EPA planned to monitor the site to prevent unacceptable exposure from the wood tar from recurring, and a five-year review would be scheduled. The EPA deleted the Westline Site from the National Priorities List of the nation's most hazardous waste sites in 1992.

In the Spring of 2014, wood tar was observed seeping from the ground at a residential property in the area. The landowner contacted the On-Scene-Coordinator (OSC) from the EPA after conducting research about previous actions at the location. Upon notification, the OSC coordinated with the EPA Remedial Project Manager (RPM), the commonwealth of Pennsylvnia Department of Environmental Protection (PADEP), and the McKean County Conservation District (MCCD). Information was exchanged and a site visit was planned..

In July, 2014, the OSC commenced with a removal assessment to determine if the change in conditions since the Site was delisted in 1992, posed a threat to public health, welfare or the environment.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On July 17, OSC Zenone, with the landowner's consent, met on-site with representatives from the PADEP Environmental Cleanup & Brownfields Program (ECBP) and the MCCD to observe conditions, gather and exchange information. Several wood tar seeps were observed in a wetland area located on the property. The wood tar was also observed along the right-descending shoreline of Kinzua Creek immediately south of the wood tar seeps observed in the wetland. The wood tar seeps appear to be located in the Westline Site, specifically in Area B described as containing interspersed tar deposits in the Feasibility Study (FS) Report prepared for EPA's Remedial Program in 1986. Observations of the current conditions by the OSC, PADEP-ECBP and MCCD indicated that there had been some change(s) in conditions since EPA completed its onsite remedial activities and delisted the Westline Site. The OSC determined that a more comprehensive removal assessment of the Westline Site was necessary to determine if these changes in conditions posed a threat to public health or the environment which would require removal or remedial action under federal or State jurisdictional authorities. The OSC would follow-up with the Remedial Project Manager (RPM) of record and EPA Regional Management (Removal and Remedial programs); PADEP-EC&BP would follow-up with PADEP's Hazardous Sites Cleanup Act (HSCA) Section; and MCCD would also follow-up as an assisting agency. EPA, PADEP and MCCD to determine if resources were available under each agency's respective authorities to further assess the potential threats posed by the current conditions, and formulate a plan of action to remove or remediate, as may be applicable.

In October 2014, EPA commenced an on-site Removal Investigation/Assessment to determine the potential threats to public health and the environment posed by the current conditions at the Westline Site.

Subsequent to the sampling event conducted by the START contractor in October 2014, the OSC has continued coordinating and exchanging information with MCCD, PADEP-ECBP, PADEP-HSCA, PADEP-W&W, PAFBC, PADOT, EPAR3-BTAG, USFWS, landowner(s) and local utilities. Topics of discussion included, but not necessarily limited to the following: access to private property; access to public property; removal options to address the wood tar observed seeping from the wetland area on either side of the driveway; removal options to address the presumed wetland area and wood tar beneath the driveway; removal options to address wood tar exposed along the right-descending shoreline of Kinzua Creek; removal options to stabilize right-descending shoreline to prevent erosion exposing additional quantities of wood tar; technical advice, guidance and removal options to conduct work within the stream channel of Kinzua Creek;

technical advice, guidance regarding shoreline stabilization as a removal option to stabilize the shoreline and mitigate future exposure of wood tar; facilitating permitting process for the dismantlement and/or relocation of gas lines crossing Kinzua Creek to facilitate access to the creek necessary to conduct removal activities; coordination of efforts with PADOT to prevent potential adverse effects that removal activities might have on the Westline Road bridge abutments; the identification of the Applicable or Relevant and Appropriate Requirements ("ARARs") of Federal and State environmental laws regarding the proposed option(s) for the removal plan of action; ensuring removal activities are consistent with long term remediation plan(s), etc.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

In September 2014, the OSC tasked the EPA Superfund Technical Assistance and Response Team ("START") contractor to prepare for a sampling event at the Site. The START contractor drafted a health and safety plan, sampling plan, and analytical request for the lab.

On October 2, 2014, START collected samples of the on-site wood tar seeps from areas on both sides of the driveway and from the wood tar along the right-descending shoreline of Kinzua Creek. The samples were packaged on ice in coolers, shipped to the assigned laboratories the day they were sampled. Sample analyses indicated an exceedance of the Risk Screening Level ("RSL") (1 x 10-6 risk and HQ - 0.1), updated January 2015, for the following volatile organic compounds (VOCs):

Benzene	5,500 ug/kg
Ethylbenzene	26,000 ug/kg

and for the following semi-volatile organic compounds (SVOCs):

2, 4 – Dimethylphenol	360,000 ug/kg
2 – Methylnaphthalene	97,000 ug/kg
4 – Methyphenol (p-Cresol)	63,000 ug/kg
Naphthalene	76,000 ug/kg

The objective of the sampling activity was to determine the concentrations of chemical compounds present in the wood tar, whether the concentrations of chemical compounds are harmful to public health and/or the environment, and whether another removal/remedial action is necessary at the Westline Site. The sampling activity will also determine whether the Westline Site has been subject to changing conditions since the completion of previous removal and remedial activities at the Westline Superfund Site. If the Westline Site has changed since being delisted from the NPL, these changes may determine that further removal or remedial action could be needed to eliminate the threat of exposure to hazardous substances, pollutants, or contaminants present in surface and subsurface soil on the Westline Site and to ameliorate the migration of contaminants into Kinzua Creek.

The START contractor also was tasked to hand-auger boreholes on-site to approximate perimeter of the subsurface wood tar where contamination had expressed itself (seeped) to the surface. Two of the boreholes encountered subsurface wood tar at a depth of less than approximately three (3) feet. The other six boreholes did not show wood tar to a depth of approximately three (3) feet, indicating that the subsurface wood tar deposits appearing as surface seeps in "Area B" of the Site, and from the subsurface upon the right-descending shoreline of Kinzua Creek may be relatively small in comparison to the wood tar lagoons and deposits addressed during the previous removal and/or remedial actions.

Subsequently, the OSC has continued coordinating and exchanging information with the MCCD, PADEP-ECBP, PADEP-HSCA, PADEP-W&W, PAFBC, PADOT, EPA Regional BTAG, USFWS, landowner(s) and local utilities. Topics of discussion have included, but not necessarily have been limited to the following: access to private property; access to public property; removal options to address the wood tar observed from the wetland area on both sides of the driveway; removal options to address the presumed wetland area and wood tar beneath the driveway; removal options to address wood tar exposed along the right-descending shoreline of Kinzua Creek; removal options to stabilize right-descending shoreline to prevent erosion exposing additional quantities of wood tar; technical advice, guidance and removal options to conduct work within the stream channel of Kinzua Creek; technical advice, guidance regarding shoreline stabilization as a removal option to stabilize the shoreline and mitigate future exposure of wood tar; facilitating the private entity permitting process for the dismantlement and/or relocation of gas lines crossing Kinzua Creek to facilitate access to the creek necessary to conduct removal activities; coordination of efforts with PADOT to prevent potential adverse effects that removal activities might have on the Westline Road bridge abutments; the identification of the Applicable or Relevant and Appropriate Requirements ("ARARs") of Federal and State environmental laws regarding the proposed option(s) for the removal plan of action; ensuring removal activities are consistent with long term remediation plan(s), etc.

Taking into consideration the advice and guidance from the aforementioned agencies and entities, the OSC had concluded that the removal plan of action will be undertaken in two concurrent phases of operation to mitigate the threats to public health, welfare and the environment due to changes in conditions in Area B since the Site was delisted in 1992: [1] actions to remove the wood tar from along the right-descending shoreline of Kinzua Creek, stabilize the shorelines and mitigate the future potential of additional quantities of wood tar from being released into Kinzua Creek, and [2] actions to remove and/or mitigate the surface seeps of wood tar on both sides of the driveway.

On July 14, 2016, the OSC submitted a Request for Approval and Funding for a Removal Action at the Westline Site into the Regional concurrence chain

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On August 17, 2016, the Request for Approval and Funding for a Removal Action at the Westline Site was approved.

2.1.2 Response Actions to Date

Defensive action, deployment of caution tape around the perimeter of the wood tar seeps from the wetland on either side of the driveway were implement and maintained by the OSC for the duration of the removal assessment

On August 17, 2016, the Request for Approval and Funding for a Removal Action at the Westline Site was approved.

On August 18, 2016, at the request of the OSC, the EPAR3 Contracting Officer issued a Task Order to the ERRS contractor to implement the removal plan of action.

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

EPA has conducted a potentially responsible party search.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal

2.2 Planning Section

2.2.1 Anticipated Activities

ERRS to mobilize RM, FCA, Safety Officer, T&D Coordinator and Engineer on-scene on August 23, 2016, to meet with the OSC, review the removal plan of action, conduct site tour and commence implementing logistics, and mobilizing resources to fully implement the removal plan of action.

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

2.2.2 Issues

ARARs and post-removal site controls dialogue continue.

2.3 Logistics Section

ERRS to mobilize RM, FCA, Safety Officer, T&D Coordinator and Engineer on-scene on August 23, 2016, to meet with the OSC, review the removal plan of action, conduct site tour and commence implementing logistics, and mobilizing resources to fully implement the removal plan of action.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

Vincent Zenone, OSC

2.5.2 Liaison Officer

2.5.3 Information Officer

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

- 1. Pennsylvania Department of Environmental Protection (PADEP)
- 2. Pennsylvania Fish and Boat Commission (PAFBC)
- 3. Pennsylvania Department of Transportation (PADOT)
- 4. McKean County Conservation District (MCCD)

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

Administrative Record