

United States Environmental Protection Agency
Region I
POLLUTION REPORT

Date: Monday, February 14, 2005

From: Hatzopoulos Athanasios

Subject: polrep 3

Troy Mills

unpaved gravel road, Troy, NH

Latitude: 40.4989942

Longitude: -74.3470170

POLREP No.:	3	Site #:	019M
Reporting Period:		D.O. #:	
Start Date:		Response Authority:	CERCLA
Mob Date:	5/19/2004	Response Type:	Time-Critical
Demob Date:		NPL Status:	NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:		Contract #	
RCRIS ID #:			

Site Description

The Site is located in Troy, Cheshire County, New Hampshire. The Site is an approximately 10-acre inactive landfill, consisting of an estimated 2-acre drum burial area, and an estimated 8-acre inactive solid waste landfill. Historical information shows that from 1967 to 1978, Troy Mills Inc., used the 2-acre area as a landfill for the disposal of solid and liquid wastes generated at its off-site facility located in the Town of Troy, New Hampshire. The wastes were drummed in 55-gallon metal containers and consisted primarily of plasticizers including bis(2-ethylhexyl)phthalate (DEHP); and Varsol, a petroleum-based solvent, also known as mineral spirits or Stoddard Solvent.

An estimated 3,886 people reside within 4 radial miles of the Site. Approximately, 3,111 are served by public or private drinking water supply wells. The nearest private drinking water supply well is presumed to be located within 0.5 radial miles of the Site. The nearest public drinking water supply well is located 2.8 miles southeast of the Site. Sensitive environments located within 4 radial miles include 2,173 acres of wetlands, a CWA-protected water body, and habitats for eight State-listed endangered or threatened species.

In September 2002, EPA conducted a Preliminary Assessment and Site Investigation Report (PA/SI) consisting of a geophysical survey, test pit excavation and sample collection activities. The PA/SI confirmed historical information that the 2-acre area of the Site contained approximately 6,000 to 10,000 55-gallon buried drums. Analytical results of the contents of the excavated drums revealed liquids/sludges, consisting of flammable substances, volatile and semivolatile organic compounds (VOCs and SVOCs) as well as inorganic contaminants. Analytical results of surficial and subsurface soil samples, as well as surface water samples collected immediately down gradient from the drum burial areas, confirmed visual observations that the buried drums were releasing the above mentioned substances.

Based on the conditions of the Site, EPA in a September 23, 2002, Closure Memorandum, determined that a time critical removal action under section 300.415 of the National Contingency Plan (NCP) was necessary and appropriate.

Current Activities

May 17-21, 2004

On May 19, EPA, NHDES and ERRS personnel conduct a site walk, meet with the Town of Troy Selectmen and discuss the site access issues and the drum and soil removal activities. The town requests EPA to sample, on a weekly basis during the summer months, their summer swimming recreation area (Sand Dam Pond) to assure that contaminants from the landfill are not migrating into the pond. On May 20, EPA and ERRS personnel discuss and review existing historical information and the characteristics of the site.

May 24-28, 2004

ERRS conducts preliminary test pit excavations on the western face of the drum burial area to assess/confirm the condition and configuration of the drums. The pit excavations reveal that some drums are empty, others contain liquids and/or sludges, and most are rusted and in poor condition. ERRS conducts preliminary estimates on drum excavation production rates.

A project coping meeting between EPA and ERRS is held to discuss project goals and task order requirements. The meeting is documented by Kathy Hunt (EPA CO).

START provides ERRS additional documentation on previous site investigations (GeoInsight Reports) and electronic drawings. ERRS begins planning the activities necessary for site setup work (road construction for access through Troy and Fitzwilliam, storage cell construction, clearing and grubbing, erosion and sedimentation (E&S) controls, command post/satellite office setup, removal of overburden/benching in upper landfill area).

EPA and NHDES meet with officials from the Town of Fitzwilliam and inform/discuss the drum and soil removal action activities to be undertaken by EPA.

June 1–4, 2004

ERRS begins work on the Technical Alternatives Analysis Report (TAAR) and mobilizes personnel on site to work on widening the earthen bridge at the “Fitzwilliam” entrance to the landfill so that material can be delivered for the road work. ERRS works on the containment system, to prevent overflow during heavy rain events.

ERRS develops and submits to EPA a draft Troy Mills Traffic Plan.

EPA begins weekly collection and analysis of surface water samples taken from Sand Dam pond per Town of Troy’s request. Samples are sent to NERL for analysis.

June 7–11, 2004

On June 7, EPA meets with DRED to discuss site access issues in order to use the railbed for the transportation of the wastes to the treatment and disposal facilities.

ERRS continues to work on the TAAR which is 85% complete. ERRS gathers additional information on waste characterization and continues the site preparation activities including road construction, storage cell construction, clearing and grubbing and E&S controls. Site preparation work is estimated to be 65% complete. Two office trailers, a decon trailer, a storage container and a 150 KW generator are delivered to the main command post area on site. A crew of 1 RM, 5 equipment operators, 5 laborers and one Chemical Technician are currently being used for site work.

On June 9, EPA and ERRS meet with the Troy and Fitzwilliam Fire and Police Departments and discuss the project approach, public safety (truck access to and from the landfill, traffic control, security, signage, hours of operation, etc).

June 14-18, 2004

On June 15, a “dry run” is made in down town Troy with a large trailer dump truck which verified that Water Street is the best route to transport the wastes from the landfill to the disposal facilities. A Town of Troy police detail is used to assist with Traffic Control during the dry run. EPA contacts the NHDOT regarding permits to place traffic control signs along Route 12. NHDOT states that they will provide suggestions on signage/permits.

START delineates the perimeter of the drum area so that an excavation grid can be established.

ERRS continues work on the site preparation activities including road construction, storage cell construction, clearing and grubbing, installation of E&S controls, and begins to strip overburden materials in drum area. A crew of 1 RM, 6 equipment operators, 1 truck driver, 3 laborers, and 1 Chemical Technician are being used for site work. Site preparation work is estimated to be 75% complete.

One trailer is delivered to the satellite command post location and is placed in an area that is owned by the Town of Troy, approximately 150 feet south of Former RR Depot Bldg.

June 21-25, 2004

ERRS awards subcontract for the 30 mL liner to Texas Environmental Plastics with delivery set for June 28, 2004. ERRS completes road construction and continues to work on other site preparation activities including storage cell construction, clearing and grubbing and installation of E&S controls in the railbed. A 2nd trailer is delivered to the satellite command post. The 16 oz. Geotextile fabric for the cell is delivered

on June 25.

ERRS continues on planning and procurement for the removal activities. T&D RFPs for soil and liquids are put out and responses are being evaluated. Bids are also solicited for the installation of gates to secure the entrances to the site. A crew of 1 RM, 4 equipment operators, 1 truck driver, 3 laborers, and 1 Chemical Technician are currently being used for site work. Site preparation work is estimated to be 90% complete.

Manned security, during non-working hours, begins on site and will continue on a daily basis throughout the removal activities.

June 28-July 2, 2004

The 30 mL liner is delivered on June 29.

On June 30, EPA attends Fitzwilliam Selectman's meeting to discuss the ongoing activities at the site. Access to the DRED rail bed gets approved as a result of the EPA's June 7 meeting with DRED.

ERRS completes rail bed road and cell construction. A crew of 1 RM, 4 equipment operators, 1 truck driver, 3 laborers, and 1 Chemical Technician are used for site work. Site preparation work is estimated to be 97% complete.

July 5-9, 2004

The ERRS Health and Safety Officer and a foreman mobilize to the site to assist the drum and soil removal activities. On July 7, ERRS meets with Meadowood Fire Department personnel to discuss using both departments to supply breathing air.

The ERRS fence subcontractor arrives on site on July 7 to discuss gate installation. Gates are scheduled to be installed next week. ERRS decides not to fit new gates to existing gate posts on the railbed due to complications with installation. Posts on both existing swing gates on the rail bed will be extended to improve visibility by truckers.

ERRS receives bids on both existing stockpiled soil and anticipated bulk liquids. ERRS is investigating the options to send the soil without fabric to ESMI in New Hampshire. The soil with fabric may go to either GSI in Canada or Waste Management in New Hampshire. ERRS is investigating the option to send the bulk liquids to Cycle Chem in New Jersey.

Representatives of the EPA's Remedial Program and NHDES, visit the site on July 7, to view the progress and discuss waste characterization and disposal issues.

START collects surface water samples from Sand Dam pond for chemical analysis. Samples are sent to NERL for analysis.

July 5-10, 2004

START establishes grids using a GPS in the upper drum area. ERRS completes the site preparation and initiates the excavation of drums and soil to be temporarily staged on site. ERRS starts to bench down and conducts trench excavations in the northeast corner of the upper drum area. Drums are located in the vicinity of groundwater in the upper drum area during initial trenching activities.

The drum shredder is mobilized to the site on July 8. ERRS completes the Updated Traffic Control and Erosion and Sedimentation Plans and submits them to EPA on July 9.

ERRS meets with personnel from local fire departments of Troy, Fitzwilliam and Meadowood on July 10 to discuss fire and emergency response procedures.

START collects surface water samples from Sand Dam pond for chemical analysis. Samples are sent to NERL for analysis.

July 12-31, 2004

ERRS fence subcontractor begins gate installation on July 13, and a 21k baker tank for collection of stormwater runoff at the pad arrives on site on July 14. ERRS meet with NHDES personnel on July 13 to discuss soil characterization issue. Dave Bowen from NHDES RCRA is working on characterization determination and comfort letter for disposal facilities. Determination should be completed within 2 weeks. Additional samples are obtained from the stockpiled soil for disposal characterization.

ERRS continues excavation of drums and soil. Drums are segregated by content (liquid/sludge/solid) and placed in designated areas of the drum staging pad. After drum contents are removed, the drums are

shredded and staged. The drums are found four feet from the surface down to a depth of 12 feet. Drums contain sludge and liquids and a mixture of fabric and/or sludge. Liquids are segregated and containerized in the excavation and removed using a vacuum skid for transport to the drum staging/processing pad. Once liquids are removed the drums are transferred to the pad and processed through a drum shredder. The shredded drums and solid/sludge waste are solidified and staged in a designated part of the cell. The visibly contaminated soil surrounding the drums is excavated and staged. In addition any soil during the drum excavation activities that looks discolored is excavated and staged. EPA samples the staged soil, sludge and liquid waste streams for disposal characterization.

ERRS begins and completes the construction of railbed bypass so that Troy and Fitzwilliam residents may use instead of the rail bed currently closed to the removal action activities.

On July 22, EPA, ERRS, NHDES and NHDOH attend a public meeting held to inform the Town of Troy and Fitzwilliam on the removal activities at the Site. EPA, ERRS, and NHDOH are the speakers. Approximately 45 residents attend.

EPA meet with ERRS and NHDES personnel regarding soil characterization and disposal options. EPA is currently awaiting NHDES's waste determination memo regarding NHDES criteria for soils remaining on site.

August 2-14, 2004

ERRS continues excavation of drums and soil. During the drum removal process, the stained soil in the excavated areas is screened with the PID. Anything over 1000 over the PID scale is removed and transferred to the contaminated soil stockpile area. The contaminated soils are consolidated in approximate 200 ton piles. Additional sampling for disposal is conducted from each end-dump and consolidated into 8-point composites. During this time period, most of the processing of the waste streams is being done in the excavation area. The pad is used primarily for shredding of drums and equipment decontamination.

ERRS conducts test to compare adsorption of Dri-Zorb (corncob product) to sawdust. Corncob product adsorbed 50% more. However, due to the higher cost of the corncob when compared to sawdust, ERRS will use sawdust to solidify the sludge waste. The empty drums are shredded and added to sludge pile.

Conference call is held between EPA, ERRS and START personnel regarding downgrading from Level B to Level C in the drum pad area. Amendment is to be drafted by START and personal air monitoring is to be conducted by ERRS.

EPA receives determination letter from the NHDES indicating that they considered MEK in the waste material as F-listed, but soils would not carry the F-list provided materials were disposed in NH at levels below 30,000 mg/kg, which is the NH Risk S2 level. ERRS will continue to seek profile approval at ESMI for the soils. Back-up facility for soil would be Waste Mgmt in NH.

On August 11, Charter Environmental is on site to remove liquids from 10k tanks. Transporter is All-State Power Vac. Approximately 4,610 gallons of waste flammable liquids are transported to Cycle Chem. Inc., in New Jersey to be burned as alternate fuel. ERRS hires the services of the Town of Troy Police Department to assist with traffic control. The police detail will be provided on any future day that wastes are to be transported from the site to the disposal facilities.

The ERRS T&D coordinator indicates that soils are accepted by ESMI and that loadout will commence next week. ERRS and EPA discuss screening the soil to remove solidified product, fabric and rocks.

August 16-28, 2004

ERRS continues excavation of drums and contaminated soils. Contaminated soils are screened for rock and fabric volume reduction and staged for transport and disposal. The unearthed drums are emptied and the wastes are segregated into two waste streams, liquid and sludge. The empty drums are shredded and added to the waste stream pile. The sludge is further solidified with sawdust for transport.

A total of 2,090 tons of contaminated soil is transported to ESMI for thermal desorption. In addition 4,697 gallons of waste flammable liquids generated from the drums are transported off site by Clean Harbors, to their facility located in Braintree, Ma. The liquids will be burned as alternate fuel. All liquids from this point will be transported Clean Harbors facility in Braintree.

Charter arrives on site with representatives from Stablax Canada to collect a sample of the sludge material. At this time, ERRS is trying to gain acceptance of the sludge waste stream into Stablax, Canada. If Stablax cannot accept it, ERRS is concurrently investigating the Clean Harbors, Samia facility

located in Canada as a backup facility.

August 30-September 18, 2004

ERRS continues excavation of drums and contaminated soils. Contaminated soils are screened for rock and fabric volume reduction and staged for transport and disposal. The unearthed drums are emptied and the wastes are segregated into two waste streams (liquid and sludge). The empty drums are shredded and added to the sludge waste stream pile. The sludge is further solidified for transport with sawdust.

From August 30- September 18, approximately 1,110 tons of contaminated soil is transported to ESMI for thermal desorption. In addition 3,483 gallons of waste flammable liquids generated from the drums are transported off site by Clean Harbors.

An operations meeting is held between EPA and ERRS to review ways to increase productivity considering screening operation and potentially mixing sludge with kiln dust.

NHDES on site as well as Metcalf and Eddy personnel for the RI/FS work when the drum and soil removal work is complete.

ERRS receives notification from Stalex that they rejected the sludge waste because of the high leaching content. However ERRS, receives approval of sludge waste into Clean Harbors at Sarnia, Canada.

ENPRO Services is on site with Vactor unit and operator to pump out sludge tanks for transfer to the staging pad for solidification. ERRS will no longer solidify in the mud tanks in order to preserve the structural integrity of tanks. Approximately 2,400 gallons pumped and left in the Vactor. Vacuum pump used to transfer sludges instead of Vactor pump due to flammability concern.

ERRS constructs a mixing cell in the northwest corner of the drum processing pad. All drum emptying and all sludge solidification will now take place in the drum staging pad.

ERRS changes sorbent pads and booms in the containment system. The contaminated pads are added to the sludge pile waste stream.

EPA and NHDES representatives visit site to discuss final soil disposition. The decision is made to use 1000 ppm on the PID as a screening level to determine contaminated soil left in the excavated areas versus clean. After reviewing the analytical results of the trench soil piles, NHDES approves that the soil can be reused as soil cover in the excavated areas. ERRS updates Sampling and Analysis Plan to reflect discussions and will collect soil samples to confirm screening level.

ERRS begins clearing and grubbing of trees and installs E&S controls on the lower drum area.

September 20 to October 16, 2004

ERRS continues the excavation of drums and contaminated soils. Contaminated soils are screened for rock and fabric volume reduction and staged for transport and disposal. The unearthed drums are emptied and the wastes are segregated into two waste streams, liquid and sludge. The empty drums are shredded and added to the sludge waste stream. The sludge is further solidified for transport with sawdust.

From September 20 to October 16, approximately 4,555 tons of contaminated soil is transported to ESMI for thermal desorption. 3,780 gallons of waste flammable liquids generated from the drums are transported off site by Clean Harbors.

During this period a representative from Clean Harbors and Capital Environmental visit site to discuss the sludge loadout to Clean Harbors Sarnia facility in Canada. They assist ERRS with ignitability test to the sludge waste stream to test each load prior to loadout. 1,180 cubic yards are transported to Clean Harbors, Sarnia facility for landfill. ERRS treats and discharges approximately 12,500 gallons of rain water from the drum pad.

ERRS procures driller for abandoning wells in the area of the former dewatering pit MW-203P, 203D & 203S. ERRS contacts John Regan of the NHDES who agreed that grouting the wells is sufficient for abandonment. ERRS hires Technical Drilling to abandon wells MW-203P, 203D, and 203S

Numerous representatives from NHDES visit site to tour operation. Two EPA OSCs also on site to view operations.

The EPA OSC and Roger Duwart of the EPA Remedial Program hold meeting with NHDES, START, Metcalf and Eddy (M&E) to discuss post excavation sampling. M&E will develop a sampling

plan to include sampling for both purposes. ERRS will provide information to M&E to assist them in putting their plan together. M&E will conduct groundwater and surface water sampling in November 2004 and will be able to use the ERRS facilities. Two distinct purposes for sampling were identified as follows: To determine what additional soils need to be excavated (as compared to NHDES Leachability GW-1) and to determine human health and ecological risk from remaining soils.

October 18-30, 2004

ERRS continues excavation of drums and contaminated soils. Contaminated soils are screened for rock and fabric volume reduction and staged for transport and disposal. The unearthed drums are emptied and the wastes are segregated into two waste streams, liquid and sludge. The empty drums are shredded and added to the sludge waste stream. The sludge is further solidified for transport with sawdust.

ERRS places sorbent pads into the trenches to collect the accumulated LNAPL and also places pads on the road ditch to capture any possible product that may escape into the environment. Rainwater collected by the drum pad sumps is treated and discharged. ENPRO an ERRS subcontractor, is on site as needed to assist ERRS with the liquid/sludge transfer and solidification. The 10,000-gallon fractioning tank is decontaminated in preparation for its removal from site.

A total of 2,376 tons of contaminated soil are transported to ESMI for thermal desorption. 4,659 gallons of waste flammable liquids are transported to the Clean Harbors Braintree Disposal Facility, and 320 cubic yards of sludge to the Samia Landfill.

Various EPA, NHDES, and Town of Troy representatives mobilized to the site for a presentation marking the removal action progress achieved to date.

ERRS conducts tours of the site for groups of visiting students from Franklin Pierce College, both of which are located in Rindge, New Hampshire, and from Keene State College, located in Keene, New Hampshire.

START collects surface water samples for VOC, SVOC, and metals and has them analyzed for content at NERL.

November 1-13, 2004

ERRS continues excavation of drums and contaminated soils. Contaminated soils are screened for rock and fabric volume reduction and staged for transport and disposal. The unearthed drums are emptied and the wastes are segregated into two waste streams (liquid and sludge). The empty drums are shredded and added to the sludge waste stream. The sludge is further solidified for transport with sawdust.

ERRS removes and replaces sorbent boom into the drainage ditch and the wetland located west of Access Road A to collect any migrating LNPL. ENPRO is on site as needed to assist ERRS with liquid/sludge transfer and solidification. ENPRO vacuums approximately 4,800 gallons of liquid from the trenches. Service Tech Inc., an ERRS subcontractor is on site to replace the carbon within the water treatment system filtration tanks. The used carbon is added to the sludge pile.

A total of 2,668 tons of contaminated soil is transported to ESMI for treatment, and 600 cubic yards of sludge is transported to the Samia Landfill.

ERRS conducts a tour of the site and related activities for a group of students from The Meeting School located in Ridge, NH. EPA Branch Chief Art Johnson and OSC Mike Barry mobilized to the site to conduct a walk through with OSC Hatzopoulos. EPA Remedial Program Manager (RPM) Roger Duwart and two M&E representatives mobilized to the site to conduct a bid walk with area drilling contractors for monitoring well installation.

November 15-27, 2004

ERRS continues excavation of drums and contaminated soils. Contaminated soils are screened for rock and fabric volume reduction and staged for transport and disposal. The unearthed drums are emptied and the wastes are segregated into two waste streams, liquid and sludge. The empty drums are shredded and added to the sludge waste stream. The sludge is further solidified for transport with sawdust.

ERRS continues screening fabric and rocks out of the pile of trench spoils, treats and discharges 4,415 gallons of water contained within the water treatment system fractioning tank, and completes the drum excavation activities. ENPRO is on site as needed to assist ERRS with sludge transfer and solidification.

A total of 3,203 tons of contaminated soil is transported to ESMI for treatment. 2,928 gallons of waste flammable liquids are transported to the Clean Harbors Braintree, and 235 cubic yards of sludge to the

Sarnia Landfill.

November 29 to December 3, 2004

ERRS continues regrading the excavation area and screening fabric and rocks out of the pile of trench spoils. The Bobcat and the 5,000-gallon fractioning tank are decontaminated, silt fence is installed in the lower drum area to control runoff, and 5,045 gallons of water contained within the water treatment system fractioning tank are treated and discharged. An ERRS surveyor is on site to establish elevations and mark locations targeted for post-excavation soil coring/sampling. ENPRO is on site to assist ERRS with decontaminating the vactor. ERRS replaces the culvert at the junction of Rockwood Pond Road and the site access road.

A total of 1,874 tons of contaminated soil is transported to ESMI for treatment. 425 gallons of waste flammable liquids are transported to the Clean Harbors facility, and 175 cubic yards of sludge to the Sarnia Landfill.

Metcalf & Eddy is on site with New Hampshire Boring, located in Londonderry, New Hampshire, to install a series of monitoring wells.

December 6-10, 2004

ERRS continues the surveying activities, screens fabric and rocks out of the pile of trench spoils, decontaminates equipment, and begins decommissioning the drum processing pad. The processed gravel used as the pad base is added to the stockpile of contaminated soil, and the underlying geotechnical fabric and LLDPE liner are staged separately for transportation to the Sarnia Landfill. The ENPRO vactor, the EPA office trailer, the 5,000-gallon fractioning tank, the Bobcat, the 30-kilowatt generator, and the CRZ trailer are demobilized from the site.

A total of 2,604 tons of contaminated soil is transported to ESMI for treatment. 4,982 gallons of liquid from the water treatment system are transported to the Clean Harbors facility, and 280 cubic yards of sludge to the Sarnia Landfill.

ERRS subcontractor Kennedy Drilling, located in Fitzwilliam, New Hampshire, mobilizes to the site with a truck-mounted Geoprobe® soil probing machine to collect soil cores from 32 sampling stations within the excavation area. ERRS subcontractor, American Drilling Services located in Sterling, Massachusetts, mobilize to site with a drill rig equipped with a hollow-stem auger to complete the soil borings and subsurface soil sampling. A drill rig is utilized due to the Geoprobe® encountering refusal repeatedly within the lower drum area. The soil samples are collected using split spoons.

Soil samples are collected by ERRS as grabs from each soil core at the midpoint between ground surface and groundwater, and from immediately above the groundwater for VOC, SVOC, and metals analyses at Severn Trent Laboratories, located in Colchester, Vermont. EPA RPMs Duwart and James Chow are on site to observe the initial sampling activities, and Metcalf & Eddy representative Bob Shoemaker is on site as observer for the duration of sampling activities.

Metcalf & Eddy personnel is on site with New Hampshire Boring to complete installation of monitoring wells, collect wetland soil and surface water samples, and to develop the monitoring wells installed over the previous two weeks.

EPA representatives Steve Novick and Sharon Fennelly mobilize to the site and conduct a walk through with OSC Hatzopoulos.

December 20-31, 2004

ERRS continue decontaminating equipment and decommissioning the drum pad. The LLDPE liner and geotechnical fabric from the drum pad, and the sheared pieces of the hoppers and product bulking containers are placed into four roll-off containers and get transported to the Sarnia Landfill. ERRS replaces the sorbent pads within the trenches and conducts general site cleanup in preparation for demobilization. North Country mobilizes to the site and decontaminates the 21,000-gallon fractioning tank. Baker Tank demobilizes the 21,000-gallon fractioning tank. A front-end loader gets demobilized from site by Hertz and Service Tech demobilizes the water treatment trailer.

A total of 451 tons of contaminated soil are transported to ESMI for treatment, and the last of the sludge material, totaling approximately 70 cubic yards, get transported to the Sarnia Landfill.

Metcalf & Eddy personnel are on site to collect a series of groundwater samples.

January 10-February 4, 2005

ERRS completes covering of the excavated fabric with soil and continues the erosion and control

measures in addition to the demobilization of equipment from the site. ERRS places barricades to isolate trenches for maintenance activities. ERRS removes and replaces sorbent material in each of three trenches. EPA and NHDES are on site to discuss trench maintenance. EPA and NHDES agree that the most efficient way to remove the LNPL from the trenches is to skim it at each trench from all manholes at the same time. ERRS builds a pumping system that enables the skimming of each entire trench at one time. ERRS performs the skimming of the LNPL into transports it into a 21K tank.

ERRS demobilizes the Lull Fork lift, 75k generator and 320 excavator.

Wastes generated and transported off site as of December 31, 2004

- 1) 7,678, 55-gallon drums have been excavated.
- 2) 21,000 tons of contaminated soil has been generated and shipped off site. Segregation was done based on the 800 ppm PID screening level based on comparison data from the off site laboratory.
- 3) 2,100 cubic yards of sludge from shredding and consolidation operations have been generated and shipped off site.
- 4) 29,924 gallons of flammable liquids from the excavated drums have been recovered and shipped off site.
- 5) 1,085 trucks have been used to transport wastes and other material from the site.

Planned Removal Actions

ERRS will continue to monitor the trenches and conduct erosion and control measures as necessary. ERRS will remobilize to the site in the spring of 2005 and cover the excavated areas with geotextile fabric followed by two feet of clean soil. In addition the covered areas will be vegetated.

Next Steps

ERRS will remobilize to the site in the spring of 2005.

Key Issues

There are no issues at this time.

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