U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Princeton Recycles - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #5**
Progress
Princeton Recycles
A25K
Princeton, NJ

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Date: 6/17/2016
Reporting Period: 1/23/16-6/17/16

1. Introduction

1.1 Background

Site Number:	A25K	**Contract Number:**	EPS21502
D.O. Number:	0014	**Action Memo Date:**	12/23/2015
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	8/31/2015	**Start Date:**	8/31/2015
Demob Date:	5/4/2016	**Completion Date:**	
CERCLIS ID:	NJR000048397	**RCRIS ID:**	
ERNS No.:		**State Notification:**	07/22/2015
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Soil contamination associated with metal recycling

1.1.2 Site Description

The Site is a former paper and metal recycling business located on Basin Street in Princeton, New Jersey. The recycling business began operations in 1955 and ceased operations in 2003. Allegedly operations at the facility included draining PCB transformers and the burning of wire casings. In 2014 and 2015 NJDEP performed extensive sampling of the surface and subsurface soil on the Site and determined the extent of PCB, lead, SVOC and dioxin contamination. Levels of all of these contaminants exceed the RMLs in Site soils. PCB concentrations (mainly Aroclor 1260) were found as high as 2,800 parts per million (ppm) in surface soils. Lead concentrations were detected as high as 11,300 ppm. Benzo(a)pyrene and dioxin were detected as high as 17 ppm and 1.3 parts per billion (ppb), respectively.

The Site is located in a residential neighborhood and is directly adjacent to a tributary to the Stoney Creek. The Site property is unsecured and accessible to trespassers. The results from the NJDEP sampling indicate there has been a release of CERCLA designated hazardous substances at the Site, which is a facility under Section 101(9) of CERCLA. Based on the available information, a CERCLA removal action is warranted at the Site. An Action memorandum signed by the Region 2 ERRD Director on August 10, 2015 authorized funding for the excavation and off-site disposal of contaminated soil. An Action Memorandum authorizing a ceiling increase of $1,265,000 for a total project ceiling of $3,245,000 was signed by the Regional Administrator on 12/23/2016. This Action Memorandum also authorizes a Change in Scope to account for additional soil excavation and 12-Month and $2M Exemptions.

1.1.2.1 Location

The Site is located at 409 Basin Street in Princeton, New Jersey (Block 11503, Lots 2 & 8). Lot 2 is 0.27 acres in size and contains a dwelling and lot 8 is 0.37 acres in size and is undeveloped. The Site also includes adjacent parcels that have been impacted by the spread of contamination including 403 Basin Street (Block 11503, Lot 1), 413 Basin Street (Block 11503, Lot 3), 417 Basin Street (Block 11503, Lot 7) and multiple Lots in Block 11301. The Site is in a residential neighborhood bordered by lands owned by Princeton University. Residences are located immediately to the south along Basin Street. A Princeton University apartment complex is located within 200 feet to the west of the Site. A tributary to Stoney Creek

flows from west to east along the north boundary of the Site.

The Site is located at 40° 19' 59.44" (latitude) / -74° 39' 19.6" (longitude).

1.1.2.2 Description of Threat

Analytical data generated from NJDEP soil sampling events in 2014 and 2015 found the above hazardous substances at concentrations well above the EPA RMLs. Elevated concentrations of these contaminants were found in surface soils (0-6 inches BGS) and down to five feet BGS. It is estimated that approximately 7,500 tons of soil will need to be removed from the Site to address the release of hazardous substances.

It is believed that the mechanism for past releases on the Site include improper management of transformer waste oils (PCBs), burning of wire and debris (dioxin and benzo(a)pyrene) and uncontrolled storage of metallic wastes (lead). The threat of future releases from the Site exists through the spread of soil contamination through surface water run-off, windblown dust and/or human tracking.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Beginning in 2014, NJDEP performed extensive soil sampling at the Site to delineate the extent of contamination. As of June 2015, NJDEP had performed four iterative rounds of soil sampling at the Site. Surface soil (0 – 6") was sampled within the main Site property in May 2014. Forty-six samples were collected. With the exception of two samples, all results showed elevated levels of PCBs, lead and/or benzo(a)pyrene above NJDEP's residential standards.

A second round of delineation samples were collected by NJDEP in August 2014. The original 46 sample locations were expanded to eighty-three locations; both deep samples within the Site where contamination had been detected and surface samples along the outer perimeter of the Site. The results indicated deeper contamination (18"– 24") in some areas. There was additional horizontal contamination above acceptable levels to the north, west and east of the main Site property. In addition to the PCB, metals, and SVOCs analyses, the second round included dioxin samples from where an open burn pit was thought to have been located. Dioxin results were as high as 1.3 ppb in this area.

In December 2014 and June 2015, a third and fourth round of samples were collected to complete the delineation of the horizontal extent of the surface contamination and to delineate the extent of vertical contamination in the sample points that had not reached an uncontaminated zone. Additional dioxin samples were also secured.

Overall the sample results indicate that the soil throughout the Site is contaminated with PCBs, lead, and benzo(a)pyrene above both NJDEP residential and non-residential standards and EPA RMLs. Dioxin is found above the NJDEP Action Level in several "burn pit' locations on the Site.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Excavation and site restoration operations were completed in the reporting period. All of the excavation area has been excavated and backfilled with clean certified fill to date. A total of 6,573.15 tons of non-TSCA contaminated soil was trucked to the Swedesboro NJ landfill. A total of 5,278.29 tons of TSCA characterized soil was shipped for disposal to the Wayne Disposal Inc. landfill in Belleville, MI.

Site restoration activities have been completed including the planting of replacement trees and the seeding of the excavation and disturbed areas. A watering program has been put in place for the summer of 2016 to ensure the survival of the replacement trees.

2.1.2 Response Actions to Date

The following response actions have been implemented to date:

- Developed a site health and safety plan, quality assurance project plan, and community air monitoring plan.
- Mobilized an Emergency and Rapid Response Services (ERRS) contractor to establish support zones, contaminant reduction zones, and exclusion zones. Initial work included marking out underground utilities and establishing excavation and staging areas.
- Established engineering controls to assure proper management of excavated materials (*i.e*. dust suppression, lined soil staging area, erosion and sedimentation control).
- Conducting air monitoring in order to monitor proper site management of excavated soil and protection of site workers and community members in close proximity to the site.
- Excavated and stockpiled approximately 9,425 tons of contaminated soil (a TSCA pile and a ID-27 pile).
- Transported 5,278.29 tons of TSCA regulated soil to Wayne Disposal, Inc. in Belleville Michigan.
- Transported 6,573.15 tons of PCB contaminated soil characterized as non-TSCA, industrial solid waste to the Gloucester County Solid Waste Landfill in Swedesboro, NJ.
- Determined acceptable local backfill sources. Backfilling of the excavation has been performed as digging progressed.
- Completed an off-site assessment of the Alexander Creek floodplain and adjacent areas located north and northeast of the Site.
- Completed full restoration of the Site and all disturbed areas.
- Demobilized the Site on May 4, 2016

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

EPA sent a notice of liability letter to the property owner of the Site (Block 11503, Lots 2& 8) . EPA has placed a lien on these properties.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
TSCA	Soil	5,278.29 tons		Landfill	Wayne Disposal Inc., Belleville, MI
Non-TSCA	Soil	6,573.15 tons		Landfill	Gloucester Co. Landfill, Swedesboro, NJ

2.2 Planning Section

2.2.1 Anticipated Activities

- Continued implementation of the watering plan

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

Completion of reports documenting the work.

2.2.2 Issues

None

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

An Action Memorandum authorizing a ceiling increase of $1,265,000 for a total project ceiling of $3,245,000 was signed by the Regional Administrator on 12/23/2016. This Action Memorandum also authorizes a Change in Scope to account for additional soil excavation and 12-Month and $2M Exemptions.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$2,675,000.00	$2,515,415.09	$159,584.91	5.97%
TAT/START	$300,000.00	$280,000.00	$20,000.00	6.67%
Intramural Costs				
Total Site Costs	$2,975,000.00	$2,795,415.09	$179,584.91	6.04%

* 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

No safety issues to date.

2.5.2 Liaison Officer

Pat Seppi from EPA PAD has been assiting with community outreach. Meetings have been held with the Princeton University Community and the Town officials to discuss the site activities including EPA's air monitoring.

2.5.3 Information Officer

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

Representatives from NJDEP visited the completed Site in May 2016 and met with the OSC. NJDEP representatives expressed satisfaction with the work completed during this site visit. EPA will be providing NJDEP with a Site completion Report in July.

4. Personnel On Site

None - Site Demobed May 4, 2016

prior to the demobe in the period 6 ERRs and 1 RST and 2 OSCs (split 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

No information available at this time.

POLREP #5 Last Updated 6/17/2016