United States Environmental Protection Agency Region III POLLUTION REPORT

Date: Wednesday, September 28, 2005

From: Dominic Ventura

Subject: Initiation of Action

Elkton Farm Firehole 183 Zeitler Rd., Elkton, MD Latitude: 39.6292184 Longitude: -75.8681150

POLREP No.: 8 Site #: A3DH RS

Reporting Period: September, 2005 **D.O.** #:

Start Date:Response Authority:CERCLAMob Date:Response Type:Time-CriticalDemob Date:NPL Status:NPL

Completion Date: Incident Category: Removal Action

CERCLIS ID #: Contract #

RCRIS ID #:

Site Description

Refer to previous polreps.

Current Activities

Under the IAG with the USACE the following documents were generated in preparation for a removal action: Project Management Plan (PMP) and a Scope of Work (SOW). The PMP is a document which lays out the overall approach to the USACE management of the removal. "The United States Environmental Protection Agency (EPA) is the lead agency on this project and is responsible for funding, public relations, and legal issues associated with the project and has overall responsibility for project delivery. The EPA will review and approve all remedial designs and work plans, providing funding to USACE ERRO. The EPA is responsible for all coordination with the site owner and with MDE. The State of Maryland Department of the Environment (MDE) is a primary stakeholder. The project should meet the substantive requirements of the MDE. The EPA is the lead agency on this project and it will determine which rules and regulations are the primary applicable, or relevant and appropriate requirements (ARARs) and goals for the remediation. The EPA will continue to coordinate and liaison with MDE, however MDE approval is not required. The United States Army Corps of Engineers has responsibility to develop the project and award the contract to investigate and remove MEC and explosives contaminated soil at the site and oversee the development of work plans and procedures, which must be acceptable to the USEPA. MDE and other stakeholders will be given information copies for their review. USACE will review plans and submittals for acceptance with concurrence from the USEPA."

On September 9, 2005, EPA and MDE officials met with USACE Baltimore District Officials at USACE offices. Purpose of meeting was to discuss responsibility for removal action and potential for USACE to assist with necessary funding, whether partial of total. On September 19, 2005 both groups met again at MDE offices in Baltimore to further discuss. USACE informed that they will cost share, specifically pay for their internal project management/oversight costs. EPA indicated that they would be willing to go forward with funding the lions share of the project, namely contractor costs and that the extent of the removal action would be limited to the 55 acre farm as outlined in the Action Memo.

On September 15, 2005 the FOSC met with the Project Management team (EPA, USACE, MDE and INFOPRO) at Edgewood to discuss finalization of work plans and site security issues. Site security was initiated on September 15, 2005. This subcontractor working for INFOPRO will man the site during day light hours.

On September 28, 2005 the Action Memo was authorized by the Director EPA R3 Hazardous Site Cleanup Division. The FOSC will work to implement the Action Memo by way of a new site specific IAG with the USACE Baltimore District.

Planned Removal Actions

Surface and subsurface removal of discarded military munitions and ordnance from the 55 acre site as

described in Action Memo. Further investigation outside this area to be conducted by MDE under their voluntary cleanup program.

Next Steps

- Issuance of delivery order by USACE to INFOPRO;
- finalization of work documents including HASP and general disposal plan;

response.epa.gov/elktonfarmfirehole