

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Thursday, November 17, 2005

From: Art Smith

Subject: Removal Work Resumes
MJ Daly Site
101 Oak Street, Ludlow, KY
Latitude: 39.0948330
Longitude: -84.5436330

POLREP No.:	3	Site #:	
Reporting Period:	10/20/2005-11/17/2005	D.O. #:	0042
Start Date:	8/26/2005	Response Authority:	CERCLA
Mob Date:	8/26/2005	Response Type:	Emergency
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	A4KJ/KYD008856668	Contract #	68-S4-02-04
RCRIS ID #:			

Site Description

The EPA removal action was initiated on August 26, 2005 and continues to date. During September-October, 2005, all above ground storage tanks were removed for proper disposal. Site work was temporarily suspended from October 19-November 11, 2005.

(See Previous Polreps and the Action Memos approved for this Site for a more complete description of site background).

Current Activities

On 11/3/05, EPA Region 4 approved a Ceiling Increase Action Memo for the MJ Daly Site to complete Phase I activities. The following activities were approved in the Ceiling Increase Action Memo to be conducted under Phase One of the removal action:

- Complete decontamination and removal of the 10,000 square foot warehouse building.
- Continue site security and other provisions to deter unauthorized access.
- ☐ Additional characterization of the extent of soil contamination and delineation of source area(s).
- ☐ Complete discussions with local government officials concerning reuse plans.
- ☐ Establish site-specific soil cleanup objectives
- ☐ Evaluation and selection of source control method(s)(e.g., soil vapor extraction, soil excavation, etc.).

On 11/8/05, ERRS mobilized personnel and equipment to the site to resume removal activities. Mobilization was completed on 11/9/05.

On 11/10/05, ERRS received disposal approval for the solidified pigment waste temporarily staged on-site. ERRS initiated load-out and transport of the material to Epperson Landfill.

From 11/11/05-11/17/05, demolition of the central concrete and metal structure at the site was conducted. Perimeter and work zone air monitoring was conducted during building demolition.

Perimeter air monitoring continues on a daily basis for nuisance particulates and VOCs during removal activities. No VOCs have been detected to date. Particulate readings continue to remain below the action level for the site. On 10/12/05, perimeter air sampling for asbestos was initiated due to the presence of non-friable asbestos containing material in the roofing tar of buildings at the site. The sampling will continue for the duration of the building demolition. The results of the initial samples yielded non-detect values.

On 11/15/05, KY DEP and EPA inspected the adjacent Premiere Pigment Facility with the building owner and operator. Subsurface piping connecting the operational facility to the MJ Daly Site were observed to be disconnected/capped at the Premiere Pigment Facility.

Planned Removal Actions

- 1) Continue building demolition.
- 2) Continue recycling and disposal of construction and demolition debris.
building scrap metal.
- 3) Continue off-shift site security.

Next Steps

Demolition of all buildings onsite is anticipated to be completed by the end of 2005.

In advance of selecting the appropriate source control method(s), the following additional activities are planned for the near term:

- Targeted removal of the concrete floor slabs to facilitate characterization of the volatile organic contamination in soil at the Site. This effort requires careful planning to avoid the airborne release of volatiles from areas where soil is known to be heavily contaminated effort. Plans are to initiate floor slab removal in December at the south end of the site and proceeding in a northerly direction. This work will be monitored with instrumentation sufficient to detect the presence of volatile organic compounds in air, and activities will cease upon discovery of strong odors or other indications that established air toxics criteria may be exceeded.
- Construction of a sump at the northwest corner of the Site to evaluate the rate at which solvent-contaminated runoff accumulates. This is necessary to determine whether liquid phase product is trapped beneath the slab at the north end of the Site or whether the organics partition from the soil into shallow groundwater at more dilute concentrations. EPA will also provide a means of collecting runoff from the sump and storing it onsite, until such time as disposal/treatment of this wastestream is arranged.

Key Issues

The lead OSC for the Site remains unable to direct daily removal operations, due to the continuing EPA response in the aftermath of Hurricane Katrina. EPA Region 5 continues to assist EPA Region 4 by allowing an OSC stationed in Cincinnati, OH to provide oversight of field operations at the Site during this period.

Disposition of Wastes

As of 11/16/2005:

- 1) 104 tons of scrap metal transported to River Steel.
- 2) 240 tons of construction debris transported to Epperson Landfill.
- 3) 2,800 gallons of residual wastes (oil/water) transported to Permafix facility.
- 4) 48 tons of stabilized material (pigment/sludge) transported to Epperson Landfill.

response.epa.gov/mjdalysite