

**United States Environmental Protection Agency**  
**Region IV**  
**POLLUTION REPORT**

**Date:** Wednesday, December 21, 2005

**From:** Art Smith

**Subject:** Removal Action - Update

MJ Daly Site  
101 Oak Street, Ludlow, KY  
Latitude: 39.0948330  
Longitude: -84.5436330

<b>POLREP No.:</b>	4	<b>Site #:</b>	
<b>Reporting Period:</b>		<b>D.O. #:</b>	0042
<b>Start Date:</b>	8/26/2005	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	8/26/2005	<b>Response Type:</b>	Emergency
<b>Demob Date:</b>		<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>		<b>Incident Category:</b>	Removal Action
<b>CERCLIS ID #:</b>	A4KJ/KYD008856668	<b>Contract #</b>	68-S4-02-04
<b>RCRIS ID #:</b>			

**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, due to a funding shortfall. As of the date of this report, all building demolition is completed, and floor slab removal is 50% complete.

Work at this site will be suspended for the Christmas/New Year's Holiday and will resume on January 3, 2006.

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

**Current Activities**

From 11/30/05-12/1/05, demolition of the southern concrete structure at the site was completed. Perimeter and work zone air monitoring was conducted during building demolition. Perimeter air sampling for asbestos was also conducted during demolition due to the presence of non-friable asbestos containing material in the roofing tar of buildings at the site. Four perimeter samples and one work zone sample were collected daily during building demolition for analysis of PCM Asbestos by NIOSH Method 7400. All samples were below actionable levels.

On 12/2/05 the remaining Asbestos Containing Material was loaded and transported for disposal to Epperson Landfill.

On 12/2/05, building demolition was completed and concrete slab removal was initiated. Concrete slab removal was started at the southern end of the site and will progress to the north. As of 12/14/05 the entire slab from the southern-most building has been removed and disposed of at Epperson Landfill. The surficial soils under the slabs are being monitored for odors and screened with PID for the presence of VOCs. No odors have been observed to date; low-levels VOC readings (<0.5 ppm) have been observed in some areas of the exposed sub-slab soils. Surficial soil screening will continue throughout the concrete slab removal and disposal activities.

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 12/20/05, several concrete tank supports were removed from behind the second southernmost building. The excavation uncovered black-stained soil and visible sheen in some places. PID showed VOC readings at 25 ppm on top of the soil, though readings several feet away matched ambient levels. The stained soil was covered and the concrete debris was removed.

### **Planned Removal Actions**

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

Demolition and removal of the concrete slab will cease at the edge of the north building, (work is estimated to reach this point by mid-January, 2006). Sampling data shows that the highest concentration of contaminants exists below the north building. The slab will remain as a barrier for infiltration until further soil analysis and soil removal plans are completed.

### **Next Steps**

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.).

Construction of a sump at the northwest corner of the Site to evaluate the rate at which solvent-contaminated runoff accumulates.

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.

Additional funding requests have been submitted by the OSC in order to complete the current phase of the removal action.

### **Disposition of Wastes**

As of 12/15/2005:

- 1) 164 tons of scrap metal transported to River Steel.
- 2) 1,141 tons of construction debris transported to Epperson Landfill.
- 3) 2,800 gallons of residual wastes (oil/water) transported to Permafix facility.
- 4) 107 tons of stabilized material (pigment/sludge) transported to Epperson Landfill
- 5) 105 tons of ACM transported to Epperson Landfill

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