

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Wednesday, January 11, 2006

From: Art Smith

Subject: Demobe planned for 1/13/06

MJ Daly Site

101 Oak Street, Ludlow, KY

Latitude: 39.0948330

Longitude: -84.5436330

POLREP No.:	5	Site #:	
Reporting Period:		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 on October 19, 2005, due to a funding shortfall. Work began again on November 11 and was suspended for the Christmas/New Year's Holiday, resuming on January 3, 2006.

All building demolition has been completed, and floor slab removal is 85% complete.

Sampling data shows that the highest concentration of contaminants exists below the north building. The remaining 15% of concrete floor remains on the north portion of the site, and serves as a barrier from infiltration until further soil analysis and soil removal plans are completed.

The site will be stabilized and secured for a temporary shut down beginning January 13.

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

Current Activities

As of 1/11/06 the concrete floor slabs from the southern and center buildings have 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. Slight chemical odors have been observed at the center, and slightly north, along the site. Low-level 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 along the perimeter and no odors have been observed outside of the site boundary lines. Particulate readings continue to remain below the action level for the site.

Several underground drainage pipes have been excavated during slab removal. On 1/9/06, drains exiting the building through the wall at the west end of the foundation were plugged with a mortar compound, in order to slow down the migration of water from the site.

On 1/10/06, an allocation of \$100,000 was received to raise the site task order ceiling from \$450,000 to \$550,000 so that the current phase of work can be safely completed by 1/13/06.

On 1/11/06, START collected a sample of run-off water, upstream of the storm drain at the northwest corner. The sample was sent to STL in North Canton, Ohio for TCL VOCs, TCL SVOCs, TAL Metals,

and Cyanide analysis. A 24-hour turnaround time was requested and sample results are expected on Friday, January 13, 2006. The results will be used to determine whether further action regarding runoff into the storm drain is necessary.

Planned Removal Actions

- 1) Continue concrete slab removal and demolition up to boundary line at north end.
- 2) Complete recycling of all construction and demolition debris collected from slab removal.
- 3) Ensure plugging of visible drainage holes on the west end of the foundation.
- 4) Leave the foundation, soil, and remaining slab in a suitable state for future sampling.

Demobilization will occur on 1/13/06 resulting in a temporary site shutdown. All equipment, including trailers and utilities, will be removed from the site. Nightly site security operations will be dismissed at this time, and a safety fence with warning signs will be set up around the perimeter of the site.

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.).

Consider need for construction of a sump at the northwest corner upstream of the storm drain based on analysis of runoff from the site.

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 01/10/2006:

- 1) 164 tons of scrap metal transported to River Steel.
- 2) 1,734 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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