

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Friday, April 28, 2006

From: Art Smith

Subject: MJ Daly Site

101 Oak Street, Ludlow, KY

Latitude: 39.0948330

Longitude: -84.5436330

POLREP No.:	6	Site #:	
Reporting Period:	01/13/2006 through 04/30/2006	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	Contract #	68-S4-02-04
RCRIS ID #:			

Site Description

The EPA removal action was initiated on August 26, 2005 and continued through early January 2006. During this period, all above ground storage tanks were removed for proper disposal, the structure was demolished and the concrete slab taken up over a portion of the site. Site work was suspended and all personnel demobilized on 01/19/06, due to personnel scheduling issues prompted by EPA's continued response to Hurricane Katrina. (See Previous POLREPs and the Action Memos approved for this Site for a more complete description of site background).

Current Activities

Before demobilizing the Site in January 2006, it was discovered that runoff possibly contaminated with hazardous constituents found at the Site was draining into the storm sewer at the northwest corner of the property. On 01/11/06, The EPA OSC directed that a sample be collected. The sample was sent to STL in North Canton, Ohio for TCL VOCs, TCL SVOCs, TAL Metals, and Cyanide analysis. Analytical results received on 01/13/06 disclosed that volatile organic compounds (VOCs) found in soil at the Site were leaching into stormwater runoff, and entering the municipal storm sewer system. Total VOCs in water were found at greater than 20 parts per million (ppm).

Based on these results, the OSC directed that the site be stabilized during the interim period when removal activities were to be suspended, as follows:

- 1) construct a french drain along the building foundation to intercept runoff leaching through contaminated soils.
- 2) provide storage for collection of contaminated runoff.
- 3) install a liner on the most heavily contaminated areas of the site to prevent rainfall infiltration.
- 4) install chain link fencing to secure the site.

Construction of these improvements began on 02/01/06, and was completed on 02/13/06. Since that time a small crew inspects the site weekly and pumps runoff collected in the french drain into a 20,000 gallon Baker Tank staged onsite. Over the last 3 months, approximately 12,000 gallons of contaminated runoff has been collected.

On 02/28/06, an additional \$100k was obligated to cover the ERRS contractor's costs associated with construction of the stabilization measures.

Planned Removal Actions

The City of Ludlow has developed a conceptual design for reuse of the Site. The plans call for the site to be filled in to allow for construction of surface parking, with the remainder of the parcel developed as greenspace. As the area of the site requiring the most fill is currently covered with a concrete slab, EPA plans to construct an engineered cap over contaminated soils. EPA will also install sheet piling to prevent continued intrusion of subsurface water and subsequent contact with contaminated soils. This should cut off the flow of water through the near subsurface and effectively mitigate the offsite migration of

contaminants. It should also eliminate the need for maintenance of the french drain once the sheet piling is installed. EPA's plans for completing the removal action will include monitoring of water levels in the existing monitoring wells and french drain to evaluate the success of cutoff measures.

EPA has gained the concurrence of the Kentucky Department for Environmental Protection (KYDEP) Superfund Branch with this approach. KYDEP wishes to better delineate the groundwater flow regime at Site, and plans on constructing an additional monitoring well adjacent to the Site. KYDEP will approach the City of Ludlow concerning access to City-owned property near the Site where the new well can be installed.

Next Steps

- 1) Complete Action Memo detailing the Scope of Work for Phase 2 of the removal action.
- 2) Meet with ERRS contractor to plan for re-start of removal activities at the Site. Target date for the re-start is June 1, 2006.

Key Issues

The key for beneficial reuse of Site requires an understanding among EPA, KYDEP, and the City of Ludlow regarding institutional controls necessary to preserve the integrity of the cap. Toward this end, EPA will facilitate discussions beginning immediately that would lead to a formal agreement concerning these issues.

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