

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

Date: Monday, June 19, 2006

From: Art Smith

To: Shane Hitchcock, EPA Region 4

Fazi Sherkat, KYDEP

Subject: Phase 2 Begins

MJ Daly Site

101 Oak Street, Ludlow, KY

Latitude: 39.0948330

Longitude: -84.5436330

POLREP No.:	7	Site #:	
Reporting Period:	06/01/2006 - 06/18/2006	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 which was initiated in August 2005 and halted in January 2006 was re-started on June 1, 2006. The scope of work for Phase 2 activities involves construction of a cap and a sheet pile wall to isolate an area of high VOC contamination in soil (total VOCs in soil > 10,000 ppm), and to cutoff the offsite migration of contaminants discharging into a nearby storm drain. (See Previous POLREPs and the Action Memos approved for this Site for a more complete description of site background).

An Action Memo clarifying the Scope of Work required to complete the removal action was signed on June 5. The ERRS Task Order was modified on June 14 by adding \$450,000 in removal funding.

The estimated time to complete work is by the end of August 2006. During this time, the OSC will continue discussions with KYDEP and the City of Ludlow to facilitate reuse of the site once the removal action is complete.

Current Activities

OSC Smith and the ERRS Contractor (CMC, Inc.) mobilized to the Site on June 1 to resume removal activities. Work activities during this period focused on connection of utilities, site preparation, completing demolition of structural components, and beginning of pile driving operations. Over 2,000 gallons of leachate was collected from the french drain constructed in the abandoned railroad right of way.

On June 8, soils exposed behind a retaining wall for the former tank farm at the northeast corner of the site exhibited a noticeable presence of solvent odors. As this represents an additional contamination source outside the limits of the proposed cap, EPA's contractors will prepare a proposal for further soil sampling to delineate areas requiring excavation and/or capping.

On June 14, excavation of soils in the former tank farm reveals caused sustained readings on the PID above 5 organic vapor units (o.v.u.) over a period of 5 minutes, with maximum values of up to 70 o.v.u. As this exceeds the action level established in the Health and Safety Plan (HASp), all exposed site workers were required to wear Level C PPE in this area to cover soils unearthed during the excavation. Once soils were covered w/plastic, no detectable levels of VOCs above background were recorded, and work continued in Level D PPE.

Pile driving activities began on June 16, and approximately 35 linear feet of piling has been completed through June 17. Sheet pile wall sections are currently being driven to a depth of about 12' below grade. By observation, these sections appear to be in good contact with a competent clay layer logged during previous soil borings taken at the site.

Planned Removal Actions

- continue pile driving operations.
- continue leachate collection.
- complete arrangements for offsite treatment of approximately 16,000 gallons of leachate.
- evaluate options for disposition of soils in tank farm area.

Next Steps

- design and construct an engineered cap over those areas where contaminated soils are present in order to prevent potential exposure to hazardous substances.
- monitoring of water levels in the existing monitoring wells and french drain to evaluate the success of cutoff measures.
- Re-grade the Site to allow for positive drainage.
- Re-seed the newly graded areas to prevent soil erosion.

Key Issues

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.

Because soil contamination will be managed in place at the Site, institutional controls on future land use will be required. Toward this end, EPA, the Kentucky Department for Environmental Protection (KYDEP) Superfund Branch, and the prospective purchaser for the Site have engaged in preliminary discussions on negotiating a covenant under Kentucky law. This agreement will require that the prospective purchaser prepare a Corrective Action Plan, which is the vehicle for implementing the institutional controls required at the Site. EPA and KYDEP will approve the Corrective Action Plan, prior to the drafting of the covenant.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$1,100,000.00	\$708,823.00	\$391,177.00	35.56%
IAGs (Bureau of Reclamation)	\$75,000.00	\$0.00	\$75,000.00	100.00%
RST/START	\$30,000.00	\$26,027.00	\$3,973.00	13.24%
Intramural Costs				
Total Site Costs	\$1,205,000.00	\$734,850.00	\$470,150.00	39.02%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

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