United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Thursday, July 6, 2006
From: Art Smith

Subject: Pile Driving Operations Continue
MJ Daly Site
101 Oak Street, Ludlow, KY
Latitude: 39.0948330
Longitude: -84.5436330

POLREP No.:	8	**Site #:**	
Reporting Period:	6/19/2006 through 6/30/2006	**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 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.

Current Activities

ERRS personnel onsite for this work is as follows:
• 1 Project Manager (PM)
• 1 Field Clerk
• 4 Equipment Operators

Equipment onsite is as follows:
• 1 CAT EL300 excavator w/rotary hammer attachment for pile driving
• 1 CAT 205LC excavator w/grappler attachment for handling sheet pile sections
• 1 CAT 205LC excavator w/hoe ram attachment for breaking concrete
• 1 small track excavator for trenching
• 1 CAT 926E loader w/fork attachment for loading sheet pile sections onto trailer @ staging area.
• 1 track loader ("Dump Trac") for pulling sheet pile sections from staging to site.
• 4 pickup trucks

Pile driving operations are about 75% complete as 3 of the 4 wall sections have been installed. Occasional refusal is encountered, requiring frequent use of the hoe ram to break up concrete discovered below grade. Work activities continue in Level D PPE, as daily monitoring with a PID reveals VOC concentrations in the exclusion zone ranging from non-detect to less than 2 organic vapor units (o.v.u.). Work interruptions due to equipment breakdowns and late afternoon thunderstorms occurred on several days during this reporting period.

On 06/21/2006, a concrete sump was discovered about 6' BLS while driving sheet pile through that area. Although sump contained waste liquids, driving sheet pile through this area with 18' sections should isolate this material.

BOR Rep Jeff Hart arrived onsite @ approximately 1630 hrs. to serve as the OSC's representative and

will remain in this capacity until the removal action is completed.

On 06/22/2006, OSC Smith conducted a site walkthrough with EPA Region 4, and KYDEP Superfund Branch personnel.

On 06/23/2006, OSC Smith demobilized the Site.

Next Steps

- complete pile driving operations (anticipated NLT 07/15/2006).
- schedule offsite treatment of approximately 16,000 gallons of leachate.
- finalize cap design and begin construction of cap.
- construct drainage system around upgradient sections of sheet pile wall.- Re-grade the Site to allow for positive drainage.
- Re-seed the newly graded areas to prevent soil erosion.

Key Issues

- On 06/22/2006, EPA, KYDEP and the City of Ludlow met concerning post-removal land use restrictions at the site. The City of Ludlow intends to take the property via eminent domain, and has requested that EPA prepare a report citing what restrictions will be required. EPA and KYDEP will prepare a draft document containing the land use restrictions.
- EPA issued a Work Authorization to the U.S. Department of Interior, Bureau of Reclamation (BOR) in the amount of $75,000 to provide a federal government representative at the site in the OSC's absence.

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