United States Environmental Protection Agency
Region I
POLLUTION REPORT

Date: Wednesday, November 29, 2006
From: AmyJean McKeown

Subject: AC Lawrence Leather Company Sludge Lagoons
0 Oxford Street, South Paris, ME
Latitude: 44.2083000
Longitude: -70.5167000

POLREP No.:	5	**Site #:**	01BG
Reporting Period:		**D.O. #:**	0054
Start Date:	8/2/2006	**Response Authority:**	CERCLA
Mob Date:	8/14/2006	**Response Type:**	Time-Critical
Demob Date:		**NPL Status:**	Non NPL
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:	MED985466093	**Contract #**	68-W-03-037
RCRIS ID #:			

Site Description
From approximately 1952 to 1977, the A.C. Lawrence Tannery (Tannery) facility, formerly located on the west bank of the Little Androscoggin River, used a metal trough to transport their waste to settling lagoons on the southeast bank of the Little Androscoggin River.

In the 1970's, the South Paris Publicly Owned Treatment Works was constructed and began accepting waste from the Tannery. In 1977, the lagoons ceased receiving wastes and a soil cap was placed over the sludge lagoons. The Tannery closed in 1985.

The land surrounding the Site is primarily wooded. A residential development is planned immediately south of the Site and currently the nearest residences are approximately 2000 feet northeast along Oxford Street. The land use on the west side of the river is industrial/commercial. The Site is located over a mapped sand and gravel aquifer.

This inactive seven acre Site is referred to as lot 7 on the Town of Paris, Maine Property Map R2. The cause of the contamination is from a non-oil manufacturing source (Tannery).

It is bounded:

- to the north by Little Androscoggin River;
- to the south by a residential development;
- to the east by Oxford Street; and,
- to the west by a railroad right-of-way and the Little Androscoggin River.

Current Activities
Week of 9 October 2006

On 9 October 2006, OSC Rice, who was covering responsibilities for OSC McKeown, EPA Chemist Clifford, START member Burton who assumed SL responsibilities for SL Lynch, RM Quinlan with two operators and two laborers were on-site. Site activities included the continued excavation on Lagoon 05 and load-out activities of the chromium-contaminated soil.

On 10 October 2006, MEDEP representative Paradis visited to observe site activities and progress.

On 11 October 2006, excavation was completed on Lagoon 05. SL Burton mapped Lagoon 05 using a Trimble GPS unit. The maximum depth of the excavation was 6 feet below ground surface and the average depth was 5 feet below ground surface. START member Burton collected 19 samples at a depth of six inches below ground surface along the riverbank. The sample locations are adjacent to Lagoon 1 and located approximately 10 feet further out from the initial riverbank samples collected 5 October 2006.

On 12 October 2006, although excavation was not possible due to heavy rainfall, and the accumulation of water in the lagoons, load out operations continued.

On 13 October 2006, excavation on Lagoon 04 began.

1,247.33 tons of chromium-contaminated soil was sent to Juniper Ridge Landfill.

Number of Samples collected
56
Samples Analyzed on-site
68
Samples analyzed by NERL
6
Samples analyzed by Shaw Laboratory(for disposal purposes)
3

Week of 16 October 2006

On 16 October 2006, START member Burton, RM Quinlan with two operators and two laborers were on-site. ESAT chemist Wafo provided analytical services. Activities included the excavation of Lagoon 04 and stockpiling and load out of chromium contaminated soil.

On 17 October 2006, RM Lutsic took over site from RM Quinlan. OSC McKeown returned to the site from on-call duties. START member Burton collected 23 samples at a depth of 0 to 6 inches below ground surface. The sampling locations were selected based upon previous sampling information, and were marked and located by GPS.

On 18 October 2006, all excavation possible on Lagoon 04 was completed. A distinctive boundary does not exist between Lagoon 01 and Lagoon 04 and portions of Lagoon 04 are under the existing load out rotary. SL Burton mapped Lagoon 04 using a Trimble GPS unit. The maximum depth of the excavation was 7 feet below ground surface and the average depth was 5.5 feet below ground surface. MEDEP Paradis came to the site to meet with OSC McKeown.

The soil is now being shipped to the Waste Management Crossroads Landfill located in Norridgewock, ME.

The total amount of chromium-contaminated soil sent to Juniper Ridge Landfill for 16, and 17 October 2006 was 707.98 tons. As of 18 October 2006 a total of 374.84 tons of chromium-contaminated soil was sent to the Waste Management Crossroads Landfill in Norridgewock, ME.

Number of Samples collected
40
Samples Analyzed on-site
43
Samples analyzed by NERL
6
Samples analyzed by Shaw Laboratory (for disposal purposes)
3

Week of 23 October 2006

On 23 October 2006, OSC McKeown, SL Lynch, RM Lutsic with one operator and one laborer were on-site. Activities for the week included the relocation of the access road for load-out trucks and the continued excavation of Lagoon 04.

On 26 October 2006, excavation of the remaining portions of Lagoon 04 was completed and backfill activities resumed. Load-out activities continued.

On 27 October 2006, excavation began on Lagoon 01 and the adjacent riverbank.

2,424.04 tons of chromium-contaminated soil were sent to the Waste Management Crossroads Landfill in Norridgewock, ME.

Number of Samples collected
29

Samples Analyzed on-site
29
Samples analyzed by NERL
3
Samples analyzed by Shaw Laboratory
0

Week of 30 October 2006

On 30 October 2006, OSC McKeown, SL Lynch, RM Lutsic with one operator and two laborers were on site. Activities for the week included the continued excavation of Lagoon 01 and the riverbank.

The backfill of Lagoon 04 was completed.

Number of Samples collected
42
Samples Analyzed on-site
42
Samples analyzed by NERL
7
Samples analyzed by Shaw Laboratory (for disposal purposes)
4

Week of 6 November 2006

On 6 November 2006, OSC McKeown, SL Lynch, RM Lutsic with one operator and two laborers were on site. Activities for the week included the continued excavation of Lagoon 01 and the riverbank.

On 7 November 2006, ME DEP Representative Paradis was on site to discuss removal activities with OSC McKeown.

The total amount of chromium-contaminated soil sent to the Waste Management Crossroads Landfill in Norridgewock ME for the week was 848.80 tons.

Number of Samples collected
30
Samples Analyzed on-site
30
Samples analyzed by NERL
2
Samples analyzed by Shaw Laboratory (for disposal purposes)
5

Week of 13 November 2006

On 13 November 2006, OSC McKeown, SL Lynch, RM Lutsic with one operator and two laborers were on-site. Load out of contaminated soil continued.

On 14 November 2006, SHAW Engineer Larry Nesbitt met with RM Lutsic to discuss options for the completion the removal action.

On 15 November 2006, EPA Section Chief Dave McIntyre arrived on site to observe the removal action and and discuss possible options for completion with OSC Rice, who was covering OSC responsibilities for OSC McKeown.

On 16 November 2006, START Project Leader (PL) Eric Ackerman conducted a site audit.

The total amount of chromium-contaminated soil sent to the Waste Management Crossroads Landfill in Norridgewock ME for the week was 901.08 tons.

Week of 21 November 2006

On 21 November 2006, OSC McKeown and one equipment operator were on site. Activities for the week included the demobilization of the water truck, two dump trucks, and one dozer. There was no excavation or load out activities completed this week due to the Thanksgiving holiday.

Planned Removal Actions

• Excavate the sludge from the lagoons and the river bank;
• Backfill excavated areas with 6" of compost and the original cap material;
• Stabilize the slope to minimize erosion and conduct ecological restoration;
• Dispose of the materials in accordance with the Off-Site Rule; and
• Coordinate with local community to evaluate preferred future land use in order to guide restoration activities to support beneficial site reuse.

Next Steps

* Continue with the excavation of chromium-contaminated soil.
* Continue shipping contaminated off-site for disposal.
* Install sheet piling along the river.

Key Issues

Since starting the excavation of Lagoon 1, we have calculated that there is 32,000 tons of soil to be excavated and shipped off-site within this lagoon at a estimated cost of $1.8 million dollars. OSC McKeown has estimated that to finish the removal action we will need $2.6 million dollars. We have been evaluating other options to complete this removal action. OSC McKeown has been in contact with both EPA and MEDEP management to discuss the options for the completion of the removal action. Since the Federal Government is operating under a continuing resolution, we have not received our Regional removal allowance and are not able to fund the completion of the removal action at this time.

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