

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

Date: Tuesday, July 29, 2008

From: Richard Haworth

Subject: POLREP 2

Applebee Road Tannery Waste Landfill

Applebee Road, Milton, NH

Latitude: 43.4964000

Longitude: -70.9656000

POLREP No.:	2	Site #:	
Reporting Period:	12 Mar 08 - 25 Jul 08	D.O. #:	
Start Date:		Response Authority:	CERCLA
Mob Date:		Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	NHN000103222	Contract #	
RCRIS ID #:			

Site Description

The Site is located principally on property owned by the Milton Mills Cemetery Association on Applebee Road, and to a lesser degree on adjacent residential property at 524 Applebee Road. Lot numbers 111 and 112 on Map 9 in the Milton Tax Assessor's Office represent their location together with surrounding parcels. The boundaries of the Site are residential property to the north, the Salmon Falls River (the NH/ME state boundary) to the east, residential property to the south, and Applebee Road to the west.

The Site is located in a rural-residential setting, with approximately 186 people in a one-half mile radius. Site property is generally flat and at-grade with Applebee Road, then drops steeply to the Salmon Falls River and flood plain/wetland below. At this time, graves are limited to a small portion of the available land. There is a baseball field between existing graves and the slope leading down to the River. There is one single-family home on the residential parcel at 524 Applebee Road. The eastern portion of this parcel is wooded, and slopes less steeply toward the River. The Salmon Falls River is a Class B water body, suitable for fishing and swimming.

The results of tests performed on samples collected from the site reveal that chromium and lead are present in exposed tannery waste at concentrations as high as 37,500 ppm and 9,850 ppm, respectively, which are significantly higher than the corresponding benchmarks of 1000 ppm and 400 ppm identified in New Hampshire's Risk Characterization and Management Policy (RMCP).

Current Activities

For activities prior to 22 April 08, please refer to POLREP I.

22 April 08 - The PRP awarded a contract to a cleanup contractor.

24 April 08 - The PRP collected 65 additional samples to better characterize the volume and location of waste.

14 May 08 - The PRP collected 10 additional samples to better characterize the volume and location of waste.

Week of 19 May 08

A kickoff meeting was held at the site on the 20th. It was attended by representatives of the PRP and its contractors, NH Department of Environmental Services (DES) and the OSC. It was agreed that all parties would continue to meet at the site every Friday morning.

An office trailer, generator, and heavy equipment were mobilized. Air monitoring was initiated. Trees and

brush were cleared to establish an access road, and in areas that were expected to be excavated. Stumps will be removed for disposal as waste, and the balance of the trees shipped off site for chipping.

The contractor began excavating tannery waste, and using a track-mounted dump truck with a fully articulating loading platform to transport waste from lower elevations up to the level field on top of the embankment to the river. One stockpile was established for waste, and a second for contaminated soil. Solid waste, such as old cars, was segregated into a third pile. The PRP estimated 104 cubic yards (cy) of waste and 24 cy of contaminated soil were excavated by the end of this week (actual quantities will be given in a final report from the PRP using weights provided by the receiving facility).

Week of 26 May 08

Additional trees were removed as necessary to reach the end of waste deposits. The OSC dispatched a member of EPA's START contractor to check on compliance with the health and safety plan for the site. Amendments to the plan were not necessary. Dust was controlled by wetting work areas with water pumped from the river. Samples of stockpiled waste were collected for disposal analysis. Samples of the soil were collected from areas where tannery had been excavated. The PRP estimated 413 cubic yards (cy) of waste and 324 cy of contaminated soil were excavated by the end of this week.

Week of 2 Jun 08

An estimated 5 cy of suspect asbestos containing material was discovered and sampled (and subsequently shipped off site for disposal). Felled trees were cut up and loaded into a dump trailers for transport off site. Test pits were dug to confirm that the outer extent of the waste area had been reached. Test pits were left open for the OSC to view at the Friday meeting prior to backfilling. Excavation of waste and contaminated soil continued. The PRP estimated 810 cubic yards (cy) of waste and 500 cy of contaminated soil were excavated by the end of this week.

Week of 9 Jun 08

The cleanup contractor demobilized for this week. Excavation could not continue pending analytical results, and shipping waste could not begin pending approval by the disposal facility selected.

Week of 16 Jun 08

Additional soil was excavated, and additional confirmatory test pits were dug. More felled trees were shipped off site. Bark mulch was delivered to be used for slope stabilization. Excavation of waste and contaminated soil continued. The PRP estimated 810 cubic yards (cy) of waste and 587 cy of contaminated soil were excavated by the end of this week.

Week of 23 Jun 08

Excavation of tannery waste and contaminated soil was complete. The PRP estimates that a total of 828 cy of waste and 679 cy of contaminated soil have been excavated.

The site was surveyed to document the revised topography and test pit locations. Backfill soil began arriving on site. Shipping waste off site began this week.

Week of 30 Jun 08

Backfill soil continued to arrive on site and was placed using the dump truck described above. Shipping waste was completed this week.

Week of 7 Jul 08

Backfill placement continued. Spreading bark mulch over the backfilled soil began. Samples were collected from the area where waste and contaminated soil were stockpiled to verify that all contamination had been removed (results verify residual contamination is not present).

The slope was reduced in one area to provide for long-term stability. The resulting volume of clean soil was used as backfill, reducing the amount of soil needing to be purchased from off site.

The toe of the remaining burn dump (not excavated as no tannery waste is present) was armored with rip rap along the lower elevations where flood waters might otherwise cause scouring.

Week of 14 Jul 08

The site was demobilized. All work is complete except for hydroseeding areas impacted by heavy equipment and truck traffic. Hydroseed will be applied after the final site visit.

22 July 08 - A final site visit was held. It was agreed all field work was complete, and hydroseeding should proceed.

Planned Removal Actions

Heavy equipment will be used to excavate tannery waste, soil, and sediment consistent with the relevant RCMP threshold. Excavated material will be transported off site to a secure landfill, and the impacted area restored to the extent practical. Capping and administrative controls may also be employed if, for example, contamination is deeper than three feet, or for other reasons approved by the OSC. Restoration includes, but is not necessarily limited to, backfilling excavated areas, and establishing a vegetative cover.

Personnel will collect samples of waste, soil, and air to comply with the requirements of the Site's health and safety plan, characterize waste, document the effectiveness of the cleanup, and assure the quality of backfill obtained from off-site vendors.

Next Steps

Review a final report due from the PRP documenting the removal action.

Key Issues

Analysis revealed that a limited number of sample points contain lead at a concentration in excess of the state standard. As these locations are associated with a municipal burn dump, and not associated with tannery waste, this soil is not subject to the requirements of the administrative order. Administrative controls will be employed to assure site conditions are documented.

Disposition of Wastes

All tannery waste and associated contaminated soil has been shipped off site.

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