Message

From: Gavlas, Sean [Sean.Gavlas@WestonSolutions.com]
Sent: 9/28/2018 2:22:17 PM
To: Moore, Gary [Moore.Gary@epa.gov]
Subject: RE: F.J. Doyle - Building (Urgent)

Gary,

We'll also need to get access to those 4 properties where you want to collect the additional drainage samples. Let me know how you want to go about that. I can see if Jason can obtain property information or we can head up there and knock on doors.

Sean Gavlas
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sean.gavlas@westonsolutions.com

From: Moore, Gary [mailto:Moore.Gary@epa.gov]
Sent: Friday, September 28, 2018 8:06 AM
To: Gavlas, Sean <Sean.Gavlas@WestonSolutions.com>
Subject: RE: F.J. Doyle - Building (Urgent)

We need to talk.

From: Gavlas, Sean [mailto:Sean.Gavlas@WestonSolutions.com]
Sent: Friday, September 28, 2018 8:01 AM
To: Moore, Gary <Moore.Gary@epa.gov>
Subject: RE: F.J. Doyle - Building (Urgent)

Good Morning Gary,

Is this a green light on wipe sampling next week or will it be addressed sometime prior to demolition/disposal?

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From: Evan Wortman [mailto:e.wortman@erllc.com]
Sent: Thursday, September 27, 2018 3:45 PM
To: Moore, Gary <Moore.Gary@epa.gov>
Cc: Don Edgington <d.edgington@erllc.com>; Delgado, Paige <Delgado.Paige@epa.gov>; Gavlas, Sean <Sean.Gavlas@WestonSolutions.com>
Subject: RE: F.J. Doyle - Building (Urgent)

Hi Gary, historically we have not considered scarp metal a CERCLA waste and have utilized scarp yards in the past for recycling. We typically do some due diligence and confirm with state DEQ that the selected scrap has no violations or issues first. However, I think wipe sampling would be a good idea and we would need to decon the metal if the wipe samples came back above the 100 ug/100 cm2. Cost of sheet metal recycling is pretty low right now so would be cheaper to landfill than to decon and recycle.

The wood can just be mixed with soil instead of profiling separately as construction debris. We'll include a certain percentage of wood, PPE, visqueen, concrete, rock, etc in the soil profile for both the TSCA and non-TSCA waste streams so its all covered.

From: Moore, Gary <Moore.Gary@epa.gov>
Sent: Thursday, September 27, 2018 1:18 PM
To: Evan Wortman <e.wortman@erllc.com>
Cc: Don Edgington <d.edgington@erllc.com>; Delgado, Paige <Delgado.Paige@epa.gov>; 'Gavlas, Sean' <Sean.Gavlas@WestonSolutions.com>
Subject: F.J. Doyle - Building (Urgent)

Evan:

I talked with our TSCA PCB person, Jim Sales, about the building at it appears that it will not be easy to be able to recycle the metal associated with the building demo. First of all, we will probably not find a metal recycler that would be CERCLA approved. Secondly, it appears that we could dispose of the metal and wood at a non-TSCA landfill if the wipe samples of the metal are less than 100 ug/100 cm2 total PCBs and the wood is less than 50 mg/kg total PCBs. Otherwise, we can just send the material to a TSCA landfill that can accept construction debris but I am not sure what profile sample they would need.

I need you guys to determine the most cost effective way to do this. I guess the wipe samples and wood sample would be no different than our profile samples (a little different with the wipe). Please research this for me and confirm what we need to do exactly to dispose. Do you guys have someone that is well versed in the TSCA PCB regulations.

Thanks

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