Updated Excavation and Disposal Plan - former City Scrap & Salvage Co.
Paul Gallagher
to:
Kenneth Bardo
09/10/2012 04:45 PM
Cc:
"Oberster, Alan C."
Hide Details
From: Paul Gallagher <pgallagher@sanbornhead.com>
To: Kenneth Bardo/R5/USEPA/US@EPA,
Cc: "Oberster, Alan C." <alan.oberster@timken.com>
History: This message has been replied to.

1 Attachment

20120910_Waste Profile-Disposal UPDATED.PDF

Hi Ken:

The supplemental PCB Cleanup at the former City Scrap and Salvage site will begin on Wednesday. This message includes an updated soil excavation plan, which also summarizes the soil disposal program. Non-hazardous soil will be disposed of at Countywide Landfill, and hazardous waste soil (based on TCLP lead results for each excavation area) will be disposed of at Envirite of Ohio. In accordance with the *Supplemental PCB Assessment and Soil Management and Disposal Plan*, post-excavation sampling will be conducted at Areas B through E.

Please contact me if you have any questions or comments.

Paul

--
Paul P. Gallagher, P.G., C.P.
Project Director

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From: Paul Gallagher
Sent: Wednesday, August 29, 2012 3:00 PM
To: 'Kenneth Bardo'
Cc: Oberster, Alan C.; 'Knott, Charles J.'
Subject:

Hi Ken:

Here's a summary of our telephone conversation yesterday about the supplemental PCB cleanup at the former City Scrap & Salvage property in Akron, Ohio. Our responses to your four comments in your message below are:

1) Borings B618 and B619 were not associated with the supplemental PCB sampling outlined in our work plan dated July 11, 2012. These soil borings were contingency explorations for the petroleum hydrocarbon investigation near the former auto prep area. We archived the samples obtained from borings B618 and B619, pending the analyses of soil samples obtained from borings located closer to the former auto prep area. Since the total petroleum hydrocarbon concentrations in soils near the former auto prep area were favorable, there was no need to analyze additional samples from outbound borings B618 and B619.
2) At B616, the laboratory was unable to report a lower detection limit due to matrix interferences during the analyses, and the hold time expired before the lab could rerun the analysis. We resampled B616 last week, and the laboratory is currently analyzing a soil sample from this location. We're anticipating that the laboratory can achieve a lower detection (i.e., <1 ppm). The proposed excavation area will be adjusted if the concentration of PCBs at B616 is greater than 1 ppm.
3) The final report will provide the information requested below. As we discussed yesterday, some of the soil may be disposed of at a different landfill, because the TCLP lead concentration in the waste characterization composite sample was slightly greater than 5 milligrams per liter. Once the final disposal arrangements have been made, we will provide a follow-up email that specifies which landfills will be used.
4) Arrangements are being made to install the fence before the road construction activities begin.

Also, the attached figure shows an updated excavation plan. The location of the proposed fence area has been modified to allow TSB Metals to extend the existing concrete pad further to the east. This change allows the size of Excavation Area A to be reduced. Fill soils generated during construction activities for the proposed concrete pad extension will be managed within the proposed fence area.

Based on your verbal approval to proceed with the supplemental cleanup during our conversation yesterday, we will begin the excavation activities once disposal arrangements are finalized.

In a forthcoming email, we will send a draft revised deed restriction for your review. The draft revised deed restriction will: describe the rational for modifying the existing deed restriction, identify the location of the fence for which inspection and maintenance will be required in the future, and establish new boundaries for the existing land use restriction (i.e., the right-of-way for the connector road will not be subject to the existing land use restriction). A final draft deed restriction will be included in the forthcoming final report.

Please contact me if you have any questions or comments. Thank you for your assistance.

Paul

--
Paul P. Gallagher, P.G., C.P.
Project Director

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From: Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]
Sent: Wednesday, August 22, 2012 12:41 PM
To: Paul Gallagher
Cc: Oberster, Alan C.; Knott, Charles J.
Subject: Re: FW: Former City Scrap - Connector Road

Paul, EPA has reviewed your letter of August 16th providing the *Supplemental PCB Assessment and Soil Management and Disposal Plan* for TSB Metals and Recycling, LLC located at 611 Wilbeth Road in Akron, Ohio. EPA provides the following comments:

- Explain why borings B618 and B619 were not sampled and analyzed.
- Sheet No. 2 of 3, Exhibit A reports PCB levels at 0 to 1 feet at B616 at <11.5 ppm. Has this data been validated and accepted? This detection limit is too high to confirm that PCBs are not present above cleanup levels. Conduct additional sampling to confirm PCB levels at this location.
- In the summary report, provide final verification results showing that Areas B, C, and D have been adequately remediated (i.e., PCBs <1 ppm). Also provide the completed manifests for disposal of approximately 900 cubic yards of PCB contaminated soil at the American Landfill in Waynesburg, Ohio.
- Ensure that the cut and fill activities associated with the proposed connector road do not impinge within the proposed fence area where PCBs >1 pppm remain (at Borings B-123, B505, B507, B508, B608). Consider erecting the proposed relocated fence in this area before road construction activities to delineate the area not to be disturbed.

From: Paul Gallagher <pgallagher@sanbornhead.com>
To: Kenneth Bardo/R5/USEPA/US@EPA
Cc: "Knott, Charles J." <charles.knott@timken.com>, "Oberster, Alan C." <alan.oberster@timken.com>
Date: 08/16/2012 08:22 AM
Subject: FW: Former City Scrap - Connector Road

Hi Ken:

For your review and approval, this message includes a letter that summarizes the findings of recent soil sampling at the former City Scrap and Salvage property. The attached letter also includes the Soil Management and Disposal Plan associated with the proposed connector road. The City of Akron wants to begin construction activities in early September 2012, so that the connector road can be completed before the asphalt plants in northeast Ohio close for the winter season. We are proposing to complete supplemental PCB cleanup activities in late August, before the construction activities begin.

I will call you this morning to review the schedule and our proposed approach, which was previously outlined in our message below.

Thank you. We appreciate your help.

Paul

--
Paul P. Gallagher, P.G., C.P.
Project Director

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From: Paul Gallagher
Sent: Wednesday, July 11, 2012 12:15 PM
To: 'Kenneth Bardo'
Cc: 'Oberster, Alan C.'
Subject: FW: Former City Scrap - Connector Road

Hi Ken:

We're sending this message to summarize the upcoming supplemental soil sampling activities at the former City Scrap and Salvage property (Site). The attached Work Plan for Supplemental PCB Cleanup Activities is based on your message below and our follow-up telephone conversation. The objective of the supplemental soil sampling is to further develop our understanding of the distribution of PCBs in soils within the eastern portion of the fenced area, where the conditions of the prior PCB cleanup restricts how excavated soils can be managed. The findings of the supplemental soil sampling will be the basis for our development of a Soil Management and Disposal Plan, which will be submitted for your approval.

The City is still working out some of the contracting issues for the road, but they hope to start the road construction later this summer. We have tentatively scheduled activities for the soil sampling to begin later this week, and we anticipate that we will complete the Soil Management and Disposal Plan for your review in early August.

Please contact me if you have any questions or comments regarding the soil sampling plan.

Thanks for your help.

Paul

--
Paul P. Gallagher, P.G., C.P.
Project Director

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From: Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]
Sent: Friday, June 22, 2012 6:30 PM

To: Paul Gallagher
Cc: Oberster, Alan C.
Subject: Re: Former City Scrap - Connector Road

paul, took a look at the info and offer the following observations.

- much of the cut-and-fill area for the connector road is outside of the restricted (fenced) area and does not require an action.
- the cut area within the restricted (fenced) area is not fully characterized for PCBs. the perimeter 7 samples have some detections both above and below 1 ppm and the 6 samples within the cut area all have detections below 1 ppm.
- EPA recommends that the eastern-half of the cut area within the restricted (fenced) area have a least 6 samples taken to confirm if PCB levels remain at <1 ppm at 0-2'.
- also, the western edge of the cut area adjacent to the new concrete pad should have at least 3 samples taken at 0-2' to see if PCB levels are >1ppm.
- based on these sample results, manage cut soils within the restricted (fenced) area accordingly. that is, soils with <1ppm PCBs can be used as fill. soils with PCBs >1ppm but <10 ppm can be managed onsite within the restricted (fenced) area if room is available or disposed of properly offsite if room is not available.
- the new fence may be placed at the perimeter of the cut area/edge of the new connector road feeding the new auto prep building.
- update Exhibit A and B of the deed restriction to define the new restricted area when work is complete.
- have a company representative onsite during the cut activities within the restricted (fenced) area to observe if anything unusual is encountered at depth (i.e., waste material, staining, etc.) that needs to be segregated and characterized to determine if it is appropriate fill material or should be properly disposed of offsite.

From: Paul Gallagher <pgallagher@sanbornhead.com>
To: Kenneth Bardo/R5/USEPA/US@EPA
Cc: "Oberster, Alan C." <alan.oberster@timken.com>
Date: 06/21/2012 04:11 PM
Subject: Former City Scrap - Connector Road

Hi Ken,

Thanks for calling me today. I have attached the updated figures that I mentioned. As we discussed, here's the key issues that we have identified regarding the proposed connector road through the western portion of the site:

1) The existing fence will need to be permanently moved before the connector road is built, and a portion of the site will become a public road. Therefore, the recorded deed restriction will need to be revised to recognize the following: 1) the new fence location and 2) the change in land use where the public road is located. When the proposed construction activities are finished, the City of Akron will acquire the property on which the connector road is located.

2) The road cut will require soils that are currently located within the fenced area to be reused as fill near the eastern end of the site. As shown on the attached figures, a portion of the excavated soils will have concentrations of PCBs greater than 1 ppm, so they will need to be managed appropriately.

3) The City of Akron wants to begin earthwork this summer, and we're trying to support their schedule.

It would be great if you could call me tomorrow to discuss the procedural issues that we should consider before committing to the City of Akron's proposed schedule. Once we have talked though the procedural issues (e.g., would this be a modification to the prior cleanup or would it need to follow the self-implement rules?) then we will provide a more detailed plan.

Thanks for your help.

Paul

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Paul P. Gallagher, P.G., C.P.
Project Director

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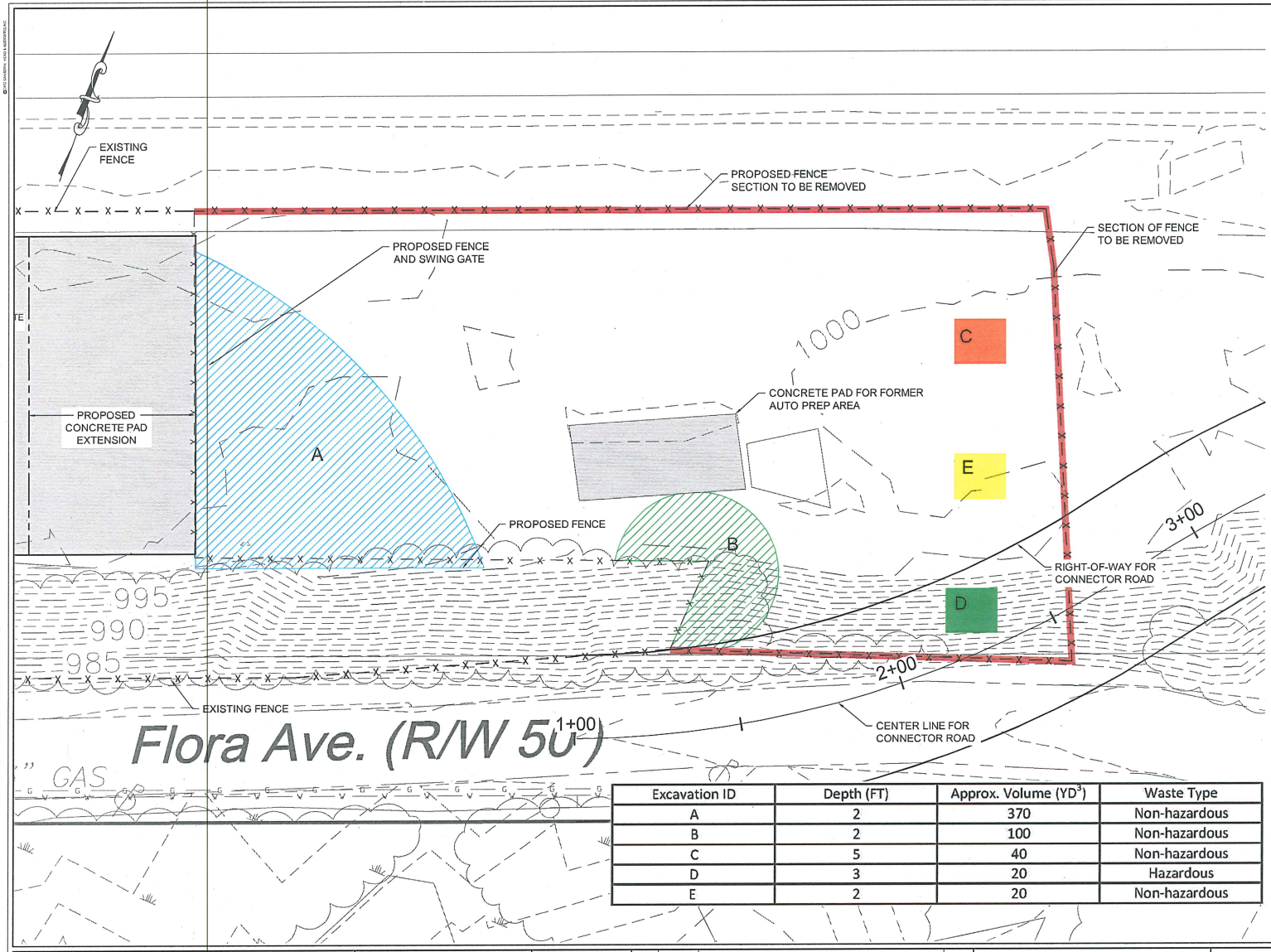
[attachment "20120605-Connector Road Historic PCBs-.pdf" deleted by Kenneth Bardo/R5/USEPA/US] [attachment "20120816 USEPA Work Plan ltr.pdf" deleted by Kenneth Bardo/R5/USEPA/US]



Excavation ID	Depth (FT)	Approx. Volume (YD^3)	Waste Type
A	2	370	Non-hazardous
B	2	100	Non-hazardous
C	5	40	Non-hazardous
D	3	20	Hazardous
E	2	20	Non-hazardous

NOTES:

1. THE BASE MAP WAS DRAWN FROM AN AUTOCAD DRAWING NAMED "EM-410762.DWG" PROVIDED BY RE WARNER.
2. THIS FIGURE DEPICTS THE PROPOSED EXCAVATION AREAS FOR PCB REMEDIATION ACTIVITIES TO SUPPORT THE RELOCATION OF THE EXISTING FENCE, WHICH IS AN ENGINEERING CONTROL FOR A USEPA-APPROVED CLEANUP IN 2009.
3. THE OBJECTIVE OF THE PROPOSED EXCAVATION ACTIVITIES IS TO REMOVE SOILS WITH PCB CONCENTRATIONS GREATER THAN 1 PART PER MILLION (PPM).
4. FOR THE EXCAVATION AREA IN WHICH VERIFICATION SAMPLING IS NOT PROPOSED, THE SIZE OF THE EXCAVATION IS BASED ON EXISTING ANALYTICAL RESULTS FOR THE EXPLORATIONS DEPICTED ON THIS FIGURE. REFER TO TABLE 1 FOR A SUMMARY OF THE EXISTING ANALYTICAL RESULTS.
5. FOR THE EXCAVATION AREAS IN WHICH VERIFICATION SAMPLING IS PROPOSED, THE DEPICTED SIZES OF THE EXCAVATIONS SHOULD BE CONSIDERED PRELIMINARY. THE ACTUAL SIZES OF THE EXCAVATIONS WILL BE BASED ON ANALYTICAL RESULTS OBTAINED DURING POST-EXCAVATION VERIFICATION SAMPLING, WHICH WILL BE CONDUCTED IN ACCORDANCE WITH THE PROCEDURES ESTABLISHED FOR THE USEPA-APPROVED CLEANUP IN 2009.
6. SOIL ANALYTICAL OBTAINED FROM AREA D FOR DISPOSAL PURPOSED WAS ABOVE THE NON-HAZRDOUS DISPOSAL LIMIT OF 5 MG/KG. EXCAVATED SOIL FROM THIS AREA WILL BE DISPOSED OF OFF-SITE AT A HAZARDOUS FACILITY.

LEGEND:

- EXISTING 2-FOOT ELEVATION CONTOUR
- 990 — EXISTING 10-FOOT ELEVATION CONTOUR
- PROPOSED 2-FOOT ELEVATION CONTOUR
- 1000 — PROPOSED 10-FOOT ELEVATION CONTOUR
- X — X — X — X — EXISTING FENCE
- AUTO PREP AREA

- A — EXCAVATED TO 2 FEET; NO VERIFICATION SAMPLE ANTICIPATED
- B — EXCAVATE TO 2 FEET; VERIFICATION SAMPLING REQUIRED
- C — EXCAVATE TO 5 FEET; VERIFICATION SAMPLING REQUIRED
- D — EXCAVATE TO 3 FEET; VERIFICATION SAMPLING REQUIRED
- E — EXCAVATE TO 2 FEET; VERIFICATION SAMPLING REQUIRED

NOT FOR CONSTRUCTION

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GRAPHICAL SCALE: 15' 7.5' 0' 15' 30'

NO.	DATE	DESCRIPTION	BY

DRAFT

DRAWN BY: T. REED/D. DOMBROWSKY
DESIGNED BY: T. REED
REVIEWED BY: P. GALLAGHER
PROJECT MGR: P. GALLAGHER
PIC: P. GALLAGHER
DATE: SEPTEMBER 2012

SOIL MANAGEMENT PLAN
TSB METALS RECYCLING
AKRON, OHIO

WASTE PROFILE AND DISPOSAL

PROJECT NUMBER: 2927.01

SHEET NUMBER: 1