

Elk Township Super Fund Clean up

Report #1

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Removal Assessment activities continued during the operational period with containers opened, HazCat techniques performed, and samples collected for laboratory analysis. Samples of surface soils and surface waters were also collected and sent for analysis. Preliminary results show beyond a reasonable doubt that materials located inside the containers have hazardous substances. Results also show surface soils impacted with the same compounds as those found inside the containers. As such, EPA is moving forward with a removal action at the property. EPA concluded assessment activities on September 27, 2013.

EPA continued to work with numerous partners including Gloucester County officials, NJDEP, U.S. Fish and Wildlife, and local officials. Twenty-four hour Site security continued to be maintained with the aid of a security firm.

2.1.2 Response Actions to Date

To view removal actions completed during other operational periods, please refer to previous Pollution Reports.

From September 22, 2013 through September 29, 2013 EPA moved and staged containers located in Areas 3 and 4 (refer to Area Designation Map). On-scene managers utilized the techniques listed in previous Pollution Reports to identify containers for HazCat. Two sampling teams collected HazCat aliquots and transferred them to the on-Site laboratory. Chemists used the HazCat system to identify containers of interest; those that exhibited non-neutral characteristics. A number of these containers were revisited and had samples collected. These samples were sent to off-Site laboratories for TCL VOCs, SVOCs, TAL Metals, PCBs, Pesticides, Herbicides, PAHs, and RCRA characteristics.

On September 27, 2013 EPA went to the Federal District Court located in Camden, NJ. Based on the analytical results of container content, the deteriorated conditions of the containers, and impacts to the human health and environment, a Magistrate Judge issued an Administrative Warrant for a Removal Action at the property. EPA secured initial funding for the commencement of Removal activities.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The Superior Barrel and Drum Co. Inc. is the owner of the facility. The president of the company is listed as Thomas Toy. During the inventorying of containers, numerous totes were found with other

company names. These totes had non-hazardous labels and indicated the contents to be residual waste. Companies listed include Container Recyclers of Camden, SRS Bro LLC of Camden, IRS Inc of Camden, Jefferson Property Partners of Camden, and others. Additional drum labels include Valspar, fruit juice concentrate, racing fuel companies, BASF, foreign countries and more.

EPA has designated Bonnie Hriczko as the enforcement case officer. A 104(e) was drafted and submitted to the property owner. Files have been located onsite and the enforcement officer has reviewed such files for additional PRPs.

2.1.4 Progress Metrics

	Number of Aliquots for HazCat Collected ¹	Number of Confirmatory Samples*	Number of Surface Soil Samples*	Number of Surface Water Sample*
Cumulative Total	252	79	36	4

¹Several containers were opened but aliquot and sample collection was not possible. This count does not include those containers.*Does not include duplicate samples or MS/MSDs for QA/QC.

Haz Class	Acid	Neutral	Potential Oil	Flammable	Oxidizer	Base	Chlorinate	HazCat Complete
Cumulative Total	8	91	52	48	16	9	4	239

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

Collaboration between EPA, NJDEP, FWS, County, and local officials will during removal activities of the Superior Barrel and Drum Site. Better engineering controls will be developed to secure releases of material during rain events and any catastrophic releases. Berms will be installed along Jacob Harris Lane in Areas 2 and 3. A more permanent and functional personal decontamination station will be built to accommodate an increase in personnel. Office space will be brought in for on-scene managers,

equipment calibration, and break rooms. All remaining containers will need to be HazCat to determine any compatible characteristics for potential bulking of materials. The on-Site laboratory will receive changes in efforts to remain operable during adverse weather conditions. Samples of containers will be done on an as-needed basis.

2.2.1.1 Planned Response Activities

During the next operational period efforts will be made to create a more efficient work environment for conducting removal activities. Road sand will be received to fill pot-holes so that larger equipment may be brought in. Sand and dirt will also be used for creating a berm along Jacob Harris Lane. This berm will follow the current temporary fence line and ensure that any releases from the leaking containers will be captured. This will also allow for on-Site personnel to monitor rain water that comes in contact with the drums and contents, and prevent migration of materials.

An increase of ERRS personnel will take over the collection of HazCat aliquots. ERRS will continue to perform the HazCat of aliquots. ERRS will also construct a decontamination station to accommodate more personnel. Mask washing stations will be provided along with more seating and SCBA hanging area. A staging area manager will be in charge of assisting personnel in and out of Level B, but also maintaining PPE supplies in the decon area. RST will suppress into a support role by providing perimeter air monitoring, calibrating equipment, maintaining the containing inventory database, and collecting any profile or disposal samples that may be needed.