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WORK PLAN
FOR
PINETTE'S SALVAGE YARD REMEDIAL
INVESTIGATION

TDD NO. F1-8507-01A

PROJECT FOR PERFORMANCE OF REMEDIAL RESPONSE ACTIVITIES AT UNCONTROLLED HAZARDOUS SUBSTANCE FACILITIES—ZONE 1

9/85

NUS CORPORATION
SUPERFUND DIVISION

SDMS Doc ID 581416

3.7.1

Site: Pinettes
Break: 3.7.1
Other:

D-583-8-5-3

WORK PLAN
FOR
PINETTE'S SALVAGE YARD REMEDIAL INVESTIGATION

TDD NO. F1-8507-01A
NUS JOB NO. ME03-PR
EPA SITE NO. MED 980-732-291
CONTRACT NO. 68-01-6699

FOR THE

REGION I
ME/NH/RI US EPA
SITE RESPONSE SECTION

September 1985

NUS CORPORATION
SUPERFUND DIVISION

SUBMITTED BY

Liyang Chu
Project Manager

APPROVED BY

RICHARD G. DINITTO
FIT I MANAGER

THOMAS PLANT
QUALITY ASSURANCE

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CUSTODY ASSIGNMENT

The Quality Assurance Representative for Region I/FIT has authorized the assignment of the noted copy of this document to the custody of the person listed below:

Controlled Copy Number: 04

Name: Dave Frasca

Organization: Region I, EPA

Date of Assignment: September 20, 1985

The following is a list of persons who have been assigned a copy of this document and their respective controlled copy numbers:

Master, NUS, Region I	01
Project File, NUS, Region I	02, 03
Dave Frasca, Region I, EPA	04-06
Don Smith, Region I, EPA	07
Tom Centi, NUS, ZPMO	08
Paul Clay, NUS, ZPMO	09

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1.0 INTRODUCTION AND SITE HISTORY

1.1 Objectives of Remedial Investigation

The Region I NUS Field Investigation Team (NUS/FIT) was tasked by the Site Response Section (SRS) of the Region I U.S. Environmental Protection Agency (EPA) to prepare a Work Plan for a Remedial Investigation at the Pinette's Salvage Yard Site in Washburn, Maine. The development of the Work Plan was authorized under Technical Directive Document (TDD) No. F1-8507-01A issued on July 26, 1985.

A spill of polychlorinated biphenyls (PCBs) occurred on the site in 1979 and was subsequently removed by the U.S. EPA in 1983 under an Immediate Removal Action. A Remedial Investigation will be conducted to provide sufficient information to determine whether the remedial action was adequate for the site to be considered for delisting from the National Priority List (NPL) per the criteria set forth in the proposed amendment to Section 300.66 of the NCP (50 FR 5862, February 12, 1985) and guidelines outlined in the EPA memorandum of March, 1984 (Appendix A).

A major consideration of this investigation is that the Pinette's Salvage Yard is a junkyard to which discarded or retired equipment may have been transported, and dismantled for salvageable metal content. This process may have involved the use of various solvents or degreasers, or other chemicals. Therefore, the investigations will be conducted to identify the presence not only of PCBs, but also chlorobenzenes, volatile organic compounds, heavy metals and pesticides.

The objectives of the Remedial Investigation are as follows:

- To characterize the extent of existing PCBs (if any) in the soil within the Pinette's Salvage Yard.
- To sample and analyze for other potential contaminants including volatile organic compounds (VOCs), heavy metals, pesticides, and chlorobenzenes.

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- As necessary, characterize site geology and hydrology.

- To characterize groundwater use in the vicinity of the Pinette's Salvage Yard.

- To determine whether there is any contamination of groundwater by the presence of PCBs, chlorinated benzenes, and other contaminants.

- To evaluate the risk to public health and the environment as the result of information obtained in this Remedial Investigation.

1.2 Scope of Work

The work that will be performed in support of evaluating the Pinette's Salvage Yard Site for delisting shall include the following:

- Project initiation which encompasses work described in Technical Directive Document (TDD) F1-8507-01A, the initial contact with state/local officials, and obtaining access onto the site.

- Phase I involves of performing file searches at applicable offices of the EPA, Maine DEP, USGS, etc. to develop a working data base. A preliminary site visit will be conducted for initial soil and water sampling. A detailed sampling program will be formulated using information developed through the preliminary sampling and file searches.

- Phase II activities consist of the collection of soil, sediment, surface water, groundwater and well water in order to identify any potential contaminants in these receptors. Monitoring wells will also be installed. In-house screening and chemical analyses of the samples will also be conducted.

- Phase III activities cover the data validation of the chemical analyses and the review and evaluation of data obtained during the first two phases. At this point of the investigation, sufficient information will have been developed to ascertain whether a recommendation for delisting should be made.

- Phase IV involves the preparation of a draft report summarizing work completed under the work plan.

- Phase V consists of the activities that follow submittal of the final report to the EPA. This effort encompasses the technical support to be provided by NUS/FIT I to the EPA during the delisting process including the preparation of documentation if delisting is deemed to be appropriate.

1.3 Site History and Description

In June 1979, three PCB-filled transformers were removed from Loring Air Force Base in Limestone, Maine, and deposited in a field at Pinette's Salvage Yard outside the town of Washburn, Maine (see Figure 1-1). At that time, at least two of the transformers were alleged to have ruptured at the salvage yard, spilling their contents onto the ground. The transformers were dismantled and sold for scrap. Figures 1-2 and 1-3 show the layout of Pinette's Salvage Yard in relation to the surrounding area.

The spill eventually came to the attention of the Maine Department of Environmental Protection (ME DEP) and the EPA. An investigation of the site was undertaken to estimate the nature and extent of contamination. As an interim measure, an impervious synthetic cap was placed over the contaminated area to reduce horizontal and vertical migration of contaminants. At that time, the site was listed on the National Priorities List issued by the EPA in December 1982. A Remedial Action Master Plan (RAMP) was developed in March, 1983 after further investigation and was completed in 1982. Sections 5.0 and 6.0 of the RAMP, which describe the characteristics of the contaminants and extent of contamination prior to removal at the Pinette's Salvage Yard Site, are located in Appendix B. (At the time the RAMP was prepared, the site was identified as the Washburn Site. This nomenclature is reflected in Appendix B. The site is now identified as the Pinette's Salvage Yard Site consistent with the name appearing on the National Priorities List. This latter name, Pinette's Salvage Yard Site, will appear throughout this Work Plan.)

An Immediate Removal Action was implemented during the fall of 1983 by the U.S. EPA. Excavation, sampling, and analysis began and continued for approximately three weeks.

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The entire capped area (100 feet x 95 feet), including the cap material, the soil beneath the cap, and the contaminated area (40 feet x 40 feet x 5 - 7 feet), beneath the cap was excavated and disposed of off site at the SCA Chemical Services Facility in Model City, New York. Samples were taken and analyzed for PCBs as excavation continued. An acceptance criteria of 50 ppm PCB in soil was used to determine at the level at which contaminated soil removal was considered to be adequate. The results of the analyses, as well as other information concerning the removal action, are shown in Appendix C. The excavation pit was backfilled, graded to allow runoff flow, and covered with hay. No further action has been taken at the Pinette's Salvage Yard Site.

Details of site activities described here can be found in the RAMP and the EPA's On-Scene Coordinator's Report of Immediate Removal Activities.

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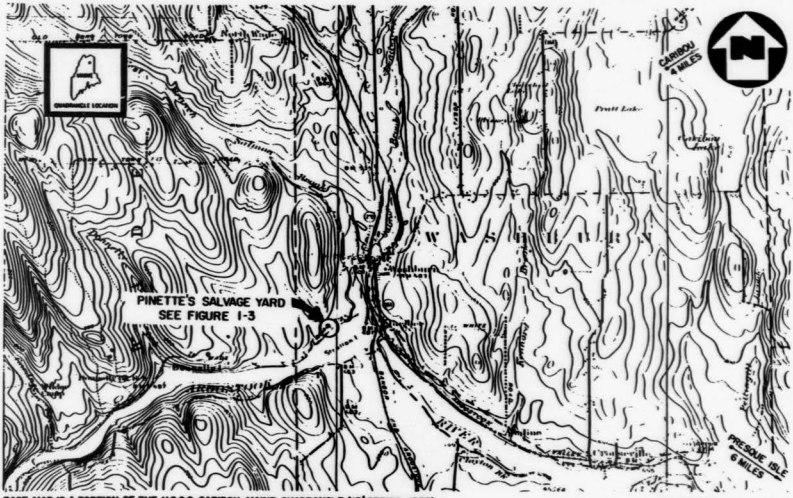

BASE MAP IS A PORTION OF THE U.S.G.S. CARIBOU, MAINE QUADRANGLE (15' SERIES, 1953)

FIGURE 1-1

LOCATION MAP

PINETTE'S SALVAGE YARD SITE, WASHBURN, ME

SCALE: 1" = 1 MILE

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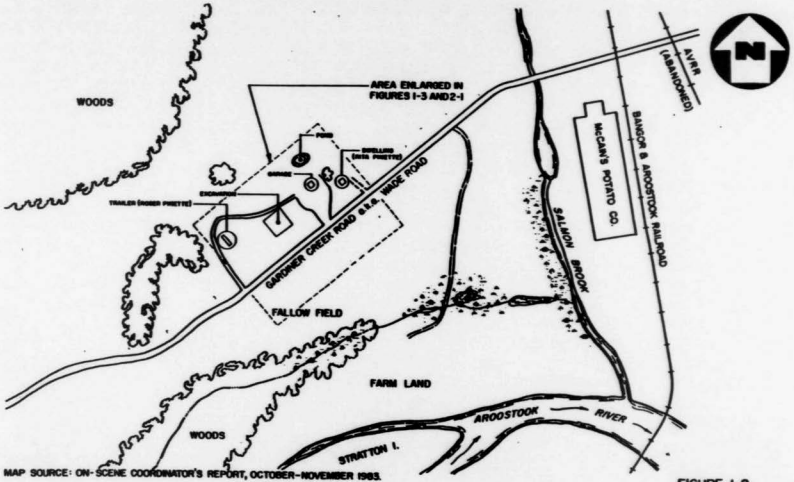

MAP SOURCE: ON-SCENE COORDINATOR'S REPORT, OCTOBER-NOVEMBER 1983.

FIGURE 1-2

VICINITY MAP
PINETTE'S SALVAGE YARD SITE, WASHBURN, ME
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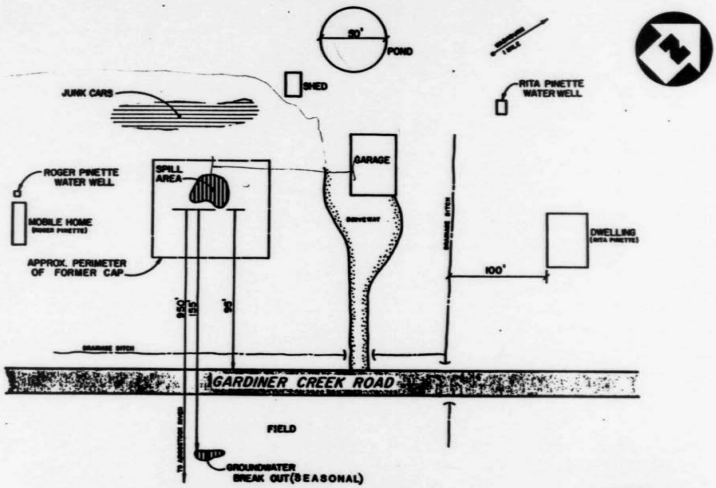

FIGURE 1-3

GENERAL ARRANGEMENT
PINETTE'S SALVAGE YARD SITE, WASHBURN, ME
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2.0 PROPOSED SCOPE OF WORK

2.1 Project Initiation

The Remedial Investigation of the Pinette's Salvage Yard Site was originally assigned to the NUS/REMPO office situated in Pittsburgh, PA. Because of the site location, logistics, subcontracting services, and other considerations, the Remedial Investigation was transferred to the NUS/FIT Region I office in Bedford, MA. The preliminary research and intended scope of work are discussed in the delisting work plan PY-0-WP-F-1, prepared by NUS/REMPO, which was used as the basis for the preparation of this work plan.

This work plan was completed under TDD No. F1-8507-01A. Work that will be performed in the Remedial Investigation was authorized under an EPA Work Assignment through EPA Contract Number 68-01-6699.

During the project initiation period, contact with the State of Maine Department of Environmental Protection, other governmental agencies (e.g., USGS) and the town of Washburn officials will be made in order to inform these parties of the intended site visit and Remedial Investigation. The property owners will also be contacted to obtain site access for the purpose of the preliminary site visit, the sampling program, and other related activities. Arrangements will also be made for the services of a local surveying contractor during this period.

Site specific Health and Safety requirements and Quality Assurance requirements will be selected for use from the standard NUS Region I manuals and guidelines for field work and sampling activities.

2.2 Phase I - Field Investigation

Following the establishment of contacts with the appropriate government agencies, a file search will be conducted at these offices for information regarding the geology, hydrology, and groundwater usage for the site and surrounding area. This information will be incorporated into the data base that will be used to develop a detailed sampling plan.

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An initial site visit will be conducted prior to the start of extensive field activities. This visit will encompass the examination of the site, identification of significant landmarks, and an evaluation of locations for future sampling. The visit will also include a round of sampling to obtain preliminary information on the presence of contaminants. Samples of soils, sediments, well water, and surface water will be obtained to provide initial data regarding PCBs and other contaminants. Portable instruments will be used such as a Foxboro Century Systems Organic Vapor Analyzer (OVA) Model 128 and an HNu Systems PI 101 Photoionization Detector for ambient air monitoring. Soil samples will be obtained at the spill area, near the shed, in the drainage ditches, and at any unusual features that may be observed. Fluid samples may be obtained from the two wells located on-site, the artificial pond, the groundwater outbreak (seasonal), and drainage ditches (seasonal).

The site visit will also establish temporary benchmarks that will be used during the course of the investigation, and to develop a base map for planning purposes.

The site visit will also provide the opportunity to obtain available information regarding the local water usage and sources of water. A list of local drilling contractors will be compiled as well.

Using the information collected, a detailed sampling plan will be prepared in a Task Work Plan to comply with the objectives of the work plan.

2.3 Phase II

This phase consists of the implementation of the Task Work Plan to obtain field data in support of the objectives stated under Section 1.1. The sampling program will focus on specific areas of concern such as PCBs and chlorobenzenes. Major pieces of equipment, such as a truck or van, will be prepared for field use. Disposable equipment will be ordered, and other equipment needs will be identified for the field activities. Personnel will be briefed regarding the site, and the Task Work Plan. Specific field responsibilities will be delegated at this time.

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All field equipment will be mobilized by truck/van to Washburn, ME, including equipment necessary for surveying, sampling, safety, decontamination and drilling. Upon arrival, a command post and a decontamination zone will be established to coordinate field activities and minimize the spread of contamination, respectively.

Locations for conducting sampling have been tentatively identified in this section for planning purposes. A detailed sampling strategy including specific location, number, and types of samples will be selected based on Phase I results. The following lists some of the sampling that is planned:

- Using the base map prepared by the surveyor, a grid pattern will be used to serve as a reference frame for the collection of soil samples. Sampling locations will have been determined as a result of the preliminary round of sampling. Soil samples will be obtained from beneath the 5'-7' depth (the depth that the site was previously excavated to).

- Sediment specimens will be collected from the drainage ditches which are situated to the east and south of the spill area. PCB laden soil or oil that has been transported by erosion or runoff may have been deposited along the walls of these ditches. NUS/FIT Region I Standard Operating Guidelines (SOG) 10A, Rev. 0 will be used.

- Surface water samples will be obtained from the groundwater outbreak (as shown in Figure 1-3), the artificial pond, and the Aroostook River (at the aprroximate rainfall drainage path outfall). NUS/FIT Region I SOG 9, Rev. 0 will be used.

- Groundwater samples will be obtained from wells installed for NUS/FIT by drilling subcontractors, from private drinking wells situated on the property, and as appropriate, groundwater used by residential and commercial concerns. Background research done under Phase I will assist in the identification of potential sampling locations. NUS/FIT Region I SOG 8, Rev. 0 will be used.

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Preliminary survey results will also establish the locations for the installation of shallow wells. These wells will be installed during the Phase II sampling effort. The shallow wells will allow for the sampling of groundwater, identification of groundwater wells, and the direction of groundwater flow overlying the clay strata. Four wells are proposed tentatively; one upgradient, and three downgradient of the spill area. The exact location and depths of the wells will be determined based on Phase I activities and prevailing field conditions.

A determination of the need for geophysical surveys will be made once chemical analyses have been completed. Geophysical surveys could provide additional data regarding the presence, location and depth of any confining clay layers.

In-house screening of collected soil and fluid samples will be performed to allow for the selection of specific samples that would be analyzed either at the EPA Lexington facility, or sent to a subcontractor in the Contract Laboratory Program (CLP).

2.4 Phase III - Evaluation

After the completion of sampling and analysis activities, all accumulated data will be reviewed and evaluated. Information regarding stratigraphy (as applicable), subsurface conditions, groundwater usage and groundwater flow will be consolidated into appropriate formats. Validation of chemical analyses will be performed by the NUS/FIT Region I in-house staff.

The collected information and data review will provide the groundwork to support a recommendation for delisting from the NPL or for additional Remedial Investigation.

2.5 Phase IV - Final Report

A draft report summarizing all activities performed for the Remedial Investigation will be prepared for submittal to the EPA for review and comment. The report will include data obtained from background review, description of work actually

performed, changes to the proposed scope of work, results of sampling and laboratory analyses, conclusions, problems encountered during the investigation, and recommendations for future delisting support activities. The draft will also incorporate all appropriate maps, charts, photos and data listings.

The draft will be provided to the EPA for comment. Upon resolution of these review comments, a final report will be issued.

2.6 Phase V - Delisting Support

Should the Remedial Investigation show that the previous remedial action was adequate, and that the PCB levels are below the 50 ppm (in soil) level, then the site will be recommended for delisting. The NUS/FIT office will provide, as necessary, technical support to the US EPA I in the delisting process and develop and prepare supporting documentation in coordination with the EPA. Documentation and supportive information obtained during the investigation will be compiled and maintained for the interim. At the appropriate time, these records will be turned over to the EPA as requested.

2.7 Community Relations

NUS/FIT Region I will also provide assistance to the EPA and participate in public hearings, as deemed necessary, in the delisting process. The NUS/FIT Project Manager will represent NUS during these meetings.

2.8 Other Considerations

Access onto the site will be obtained from the property owners for the purpose of conducting all field activities. Contact with the owners will be initiated by NUS/FIT Region I after authorization by the EPA RSPO. A follow up letter will be sent to confirm an access agreement.

Subcontractors capable of providing services required for the Remedial Investigation will be identified. Subcontractors will be required for surveying and drilling services. Actual bid specifications will not be prepared until authorization

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to proceed with the Remedial Investigation has been received. During the Phase I activities, generalized subcontractor requirements and quality assurance requirements will be identified so that descriptions of potential work may be transmitted to potential subcontractors.

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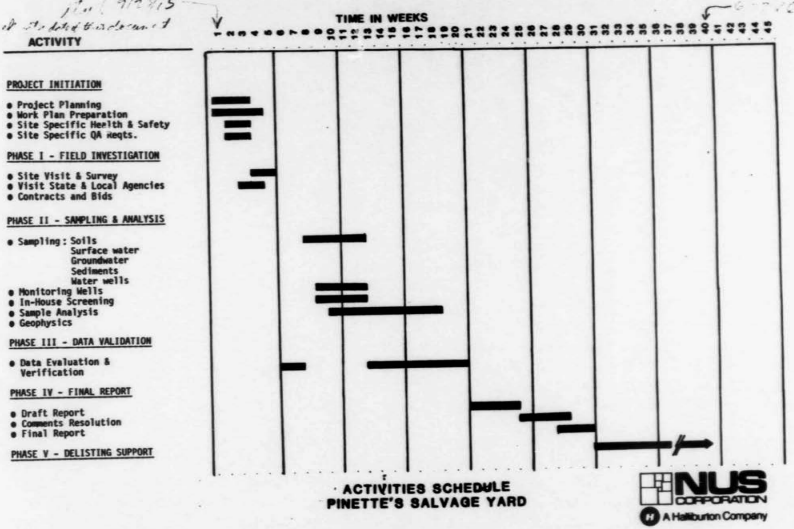
3.0 SCHEDULE

3.1 Project Schedule

Figure 3-1 shows the projected project schedule for the performance of the Pinette's Salvage Yard Site Remedial Investigation. Work actually performed may vary from the planned schedule and will be discussed in the Final Report.



ACTIVITIES SCHEDULE
PINETTE'S SALVAGE YARD

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APPENDIX A
INTERIM PROCEDURES FOR DELETING SITES FROM THE NATIONAL PRIORITIES LIST

EPA MEMORANDUM, MARCH 1984

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR 27 1984

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Interim Procedures for Deleting Sites from the National Priorities List

FROM: Lee M. Thomas
Assistant Administrator

TO: Regional Administrators
Regions I-X

INTRODUCTION

The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) requires that the National Priorities List (NPL) be revised at least annually. Along with the addition of new sites to the NPL, EPA has contemplated that revisions would include deletions from the active NPL list to indicate sites that have been cleaned up or that have been determined not to present a health, welfare, or environmental hazard. This memorandum sets forth deletion criteria and interim procedures for making such deletion revisions to the NPL.

The interim approach to deletions, which will be conducted for the next update of the NPL (expected in August 1984), is to establish a "deletion category" on the NPL. Although part of the NPL, this category will be explicitly denoted as containing sites that have satisfied one of the deletion criteria and hence been deleted from the active NPL. This mechanism for deletion is being used in light of the fact that the National Contingency Plan (NCP) currently restricts expenditure of Fund monies to sites on the NPL. The deletion category mechanism, because it denotes deletions without actually removing the site completely from the NPL, will allow EPA to return to a site and expend Fund monies as warranted for operation and maintenance costs, continued monitoring, or correction of any failures of the remedy even though the site has been "deleted."

The first group of deletions, since they will be proposed in the next update of the NPL, will be made pursuant to the same Federal Register notice and comment procedures that we use for placing sites on the NPL. The update notice in the Federal

Register will present a list of sites proposed for deletion, and request public comment for a period of sixty days. After the comment period, EPA will evaluate the comments, arrive at final decisions on the proposed deletions, and publish a list of the deleted sites in the Federal Register.

We are considering alternatives to the various procedures presented here, and may implement changes in this guidance if experience with the first group of deletions supports any alternatives. For example, it may be that the Federal Register notice and comment procedures conducted for addition of sites is more complex than is necessary for the deletion of sites. Consequently, we are considering the possibility of more streamlined administrative procedures for deletion decisions that arise after this first group, including possible delegation to the Regions. Also under consideration is the possibility of amending the NCP to provide that Fund monies may be spent on NPL sites even after they have been deleted, in order to allow deleted sites to be removed from the list entirely. In addition, documentation requirements may be expanded or adjusted to relate precisely to the types of deletion situations that arise. EPA probably will present these or other alternatives in the first deletion proposal scheduled for August 1984.

Although deletion recommendations may be forwarded to Headquarters at any time, deletion recommendations for the August 1984, update must be received by Headquarters by June 1, 1984. This means that the advance notice to the public (see below) must commence by mid-April. Please note that instructions for adding new sites for the August 1984, update will be issued in the near future. Regions are encouraged to coordinate closely with Headquarters program staff prior to submitting deletion recommendations to ensure that documentation is adequate but not duplicative, and to facilitate Headquarters concurrence. As the number of sites that are potentially eligible for deletion increases, it is important that we develop a process that establishes a strong technical basis and adequate documentation for such decisions.

The decision to delete a site will be based on whether the site meets one of three general deletion criteria reflecting either cleanup of the site or the fact that the site does not present a significant risk. In order to determine whether one of the criteria have been met, EPA will determine if the designed remedy has been implemented and is performing properly, including whether monitoring results, if any, confirm the adequacy of the remedy. Alternatively, if the site has been determined not to present a health risk even though cleanup has not been prescribed or performed, the deletion decision will be based on the study by which that determination was reached.

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The deletion criteria and interim procedures for deletion described herein are not intended to establish specific monitoring requirements or performance criteria. These site-specific parameters are incorporated into the design of individual remedial actions at each site in the form of post-closure monitoring, operation and maintenance plans, and remedy performance validations.

DELETION CRITERIA

Regions can recommend deletion of a site from the current NPL at any time after consultation with the State or after a State has specifically requested the deletion. A site can be deleted when one or more of the following deletion criteria has been met:

1) EPA, in consultation with the State, has determined that responsible parties have completed all appropriate response actions.

2) EPA, in consultation with the State, has determined that all appropriate Fund-financed response actions have been completed and that no further cleanup by responsible parties is appropriate.

3) Based on a remedial investigation, EPA has determined that the facility poses no significant threat to public health, welfare, or the environment and, therefore, construction of remedial measures is not appropriate.

These criteria, which have been adjusted slightly since they were first formulated by the Agency, are the only deletion criteria EPA has developed to date. As explained in the preamble to the NPL, however, these criteria constitute guidance, not regulations. They could be revised or supplemented if experience indicates that other factors should be taken into account. At this time, however, it appears that these three criteria are adequate.

INTERIM PROCEDURES

Advanced Notification

EPA Regional Offices should initiate the recommendation to delete a site from the NPL after it has been determined that the site meets one or more of the deletion criteria.

Subsequent to discussions with Headquarters program staff, but before the deletion recommendation is transmitted to Headquarters, the Regional Office of Public Affairs/Superfund Community Relations Coordinator will prepare a notification state-

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ment to announce the Agency's intent to propose a site deletion. The notification statement should be provided to the local community, State and local officials, appropriate Federal agencies such as the Center for Disease Control and the U.S. Coast Guard, and enforcement personnel from the Office of Regional Counsel so that they are aware of EPA's intent to delete the site and are given an opportunity to comment on the proposed action. The Regional Counsel should inform the State Attorney General and other concerned agencies (e.g., State or Federal courts, U.S. Department of Justice, as appropriate) of the deletion proposal. A copy of the notification statement should be sent to the Headquarters' Hazardous Site Control Division (WH-548E).

The notification statement will be distributed to interested local residents, local and State officials, and other Federal agencies two weeks prior to the beginning of a three week comment period. The Regions will use the responsiveness summary format provided by Headquarters to summarize comments. A responsiveness summary of the comments will be a required component of the deletion recommendation and will be sent to individual commentors and other interested parties. Based on the comments received in response to the notification statement, Regions may elect to delay forwarding the deletion recommendation until the issue(s) raised can be resolved.

The notification statement will provide the dates of the comment period, the location in the community of relevant documents for review and the name and address of a Regional contact where comments may be sent. Public meetings may also be held by the Region during this period. The notification statement should indicate that a second opportunity to comment will be provided during the 60-day public comment period following proposal in the Federal Register, if the site is formally proposed for deletion. Notice of this 60-day public comment period will be mailed to the local press, State and local officials, appropriate Federal agencies, and interested community residents.

The notification statement should also include a description of the Agency's close out plan for the site. The close-out plan should delineate the operation and maintenance procedures that will be implemented and the monitoring program. In addition, the notification statement should indicate that even though a site is deleted, EPA will retain the authority to spend money on deleted sites that require additional work.

Management Process (See Attachment)

Subsequent to the receipt of public comments in response to the advanced notification statement and the preparation of the response summary, the Regional Administrator should transmit the deletion recommendation to the Assistant Administrator for Solid

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Waste and Emergency Response (AA, OSWER) for formal concurrence. Headquarters review and concurrence procedures will be directed by the Hazardous Site Control Division (HSCD), Office of Emergency and Remedial Response (OERR). For sites which involve complex technical aspects, Headquarters may request assistance from the Regions in the form of a technical briefing.

Subsequent to concurrence on the Regional deletion recommendation, the AA, OSWER, will recommend to the Administrator through the formal Red Border Review process that the site be proposed for the deletion category of the NPL. After considering the comments received during the 60-day public comment period following proposal in the Federal Register, the AA, OSWER will recommend to the Administrator the publication of the decision to place the site in the deletion category.

Contents of Deletion Recommendation

The information contained in the Region's deletion recommendation will be used by Headquarters to perform a concurrence evaluation and establish an adequate and documented basis for a deletion decision. Adequate documentation will be essential given the variety of public and private parties potentially interested in deletion decisions. The documentation requirements are essentially identical to those established for rulemaking on NPL site additions. The majority of the required information can be provided by submitting existing documents.

The deletion recommendation will consist of a brief overview memorandum and supporting documents that will be placed in the Agency's docket. Presently, the Agency's final decision for deletion from the NPL will be conducted in Headquarters. Therefore, a docket supporting the deletion decision will be maintained both in Headquarters and the Regions.

The overview memorandum should discuss several key points to support site deletion, including the following:

- Narrative summary briefly describing the site and the implemented remedy, including a site chronology describing the sequence of remedial response steps and associated expenditures.

- Description of how the site qualifies for one or more of the deletion criteria. The description should include a brief summary of monitoring results and validation of remedy implementation and performance contained in the task or progress reports, or final technical reports accompanying the overview memorandum or referenced as being in Headquarters.

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- Certification that the State and Enforcement personnel of the Office of Regional Counsel have been consulted concerning the intent to delete the site.

- Certification that the Region has provided the local community with an advance public notification and three week comment period on the Agency's intent to propose the site for deletion and the Agency's plans for closing out the site.

- Bibliographic references to any additional pertinent information in the Regional file that is not included in deletion recommendation documents submitted to Headquarters (these documents are described below).

In addition to the brief overview memorandum, the deletion recommendation must include various supporting documents to be placed in the Agency's docket for the deletion decision. Most of the documents described below will already be in Headquarters and, therefore, such documents need only be referenced. Those which are not already in Headquarters must be submitted with the overview memorandum.

The necessary documents will vary depending upon the deletion criterion and the type of project (Federal, State, or responsible party). Therefore, the minimum requirements for various criteria are provided below:

Deletion Criterion #1. In order to qualify for this criterion, a site must have been cleaned up by a responsible party.

- Federal Enforcement Lead. For more recent Federal enforcement lead projects, documentation should include the enforcement feasibility study defining the remedy, the Enforcement Record of Decision (EROD), and the task or progress reports indicating that the remedy has been implemented and is performing properly. If more than one EROD was developed, the equivalent documents will be required for each EROD. In addition, any special provisions of the EROD(s) requiring further action must be addressed.

  For older Federal enforcement lead projects (no EROD), documentation should include a copy of the responsible party cleanup protocol, along with any EPA or State comments concerning the protocol, and task or progress reports sufficient to show that the protocol was followed. Documentation should also include a copy of an EPA study or an EPA review of a responsible party study or documents used by the Regions to make the determination that the remedy has been implemented and is performing properly and that no further cleanup is appropriate. The EPA review or study could be funded via REM/FIT or TES.

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- State Enforcement Lead. Documentation should include the State feasibility study (if one has been prepared), a copy of the responsible party cleanup protocol, along with any EPA or State comments concerning the protocol, and task or progress reports sufficient to show that the protocol was followed and the remedy has been implemented and is performing properly and that no further cleanup is appropriate. If the State has not prepared a feasibility study that meets EPA standards, documentation should include a copy of an EPA or State study, or an EPA or State review of a responsible party study or documents used by the Regions to determine that the remedy has been implemented and is performing properly and that no further cleanup is appropriate. The EPA review or study could be funded via REM/FIT or TES.

- Federal Facilities. Documentation should include a copy of the appropriate Federal Agency's feasibility study (if one has been prepared), a copy of the Agency's cleanup protocol, along with any EPA or State comments concerning the protocol, and task or progress reports sufficient to show that the protocol was followed and the remedy has been implemented and is performing properly and that no further cleanup is appropriate. If the Federal agency has not prepared a feasibility study that meets EPA standards, documentation should include a copy of an EPA or State study, or an EPA or State review of a Federal agency's study or documents used by the Regions to make a determination that the remedy has been implemented and is performing properly and that no further cleanup is appropriate. The EPA review or study could be funded via REM/FIT.

Deletion Criterion #2. In order to qualify for this criterion, a site cleanup must have been conducted by the State under a negotiated Cooperative Agreement or by EPA under a Superfund State Contract.

- Cooperative Agreement. The final technical report from the State, approved by EPA, must be included. This report must describe the State's operation & maintenance (O&M) responsibilities. In addition, the documentation should include the feasibility study, the Record of Decision (ROD), and the task or progress reports indicating that the remedy has been implemented and is performing properly. If more than one ROD was developed, the equivalent documents will be required for each ROD. In addition, any special provisions of the ROD(s) requiring further action must be addressed.

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- Superfund State Contract. Documentation should include the feasibility study, the ROD, and the task or progress reports indicating that the remedy has been implemented and is performing properly. If more than one ROD was developed, the equivalent documents will be required for each ROD. In addition, any special provisions of the ROD(s) requiring further action must be addressed.

Deletion Criterion #3. In order to qualify for this criterion, EPA must have selected the "No Action" alternative based on a determination that a site's present condition poses no significant threat to public health, welfare or the environment.

- "No Action" Alternative Was Selected. Documentation should include the remedial investigation (or the equivalent EPA-approved investigation) which demonstrates that the release will pose no significant threat to public health, welfare or the environment. In cases where a remedial investigation/feasibility study was prepared, the Region should enclose the ROD or EROD recording approval of the "no action" alternative.

Deletion Criteria #1, #2, and #3. In addition to the criterion specific requirements described above, the documentation supporting the deletion decision must cover the following (Note: the first three items below may be omitted if the required information is provided in the ROD or EROD):

- Post-Closure Monitoring. Documentation should include a description of the EPA or State monitoring plan and how the results confirm the reliability and performance of the remedy. For Criterion #3, the monitoring plan should identify how monitoring will detect any release prior to significant impact. In instances where no monitoring will be required under Criterion #3, an explanation as to how that determination was made will suffice. For projects using standard remedies, preliminary results demonstrating effects of the remedy may be available within 1 to 2 months. However, more complex treatment systems may require 6 or more months to confirm the reliability and performance of the remedy. If post-closure monitoring is judged to be unnecessary, a justification must be included.

- Operation & Maintenance (O&M) Plan. Documentation should include a statement that State or responsible party O&M assurances have been met, a description of the O&M, a schedule for its implementation, and identification of the source of future funding.

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- Regional Counsel consultation. Documentation should include a summary of their position or relevant correspondence on the proposed deletion.

- Responsiveness Summary. Documentation should include a summary of the response from the local community, State and local officials, and other Federal agencies to EPA's proposal to delete the site from the NPL and the site close-out plan. The assessment should be in the responsiveness summary format provided by Headquarters and be based on the response to the advance notification statement of EPA's intention to propose the site for deletion. If the community, individuals, or Agency response indicates a strong disagreement with the deletion, justification for proceeding with the deletion proposal should be provided.

If there are any specific questions concerning these procedures, please contact Scott Parrish (FTS-382-5632).

cc: Superfund Coordinators, Regions I-X
Director, Ofc. of Emergency & Remedial Resp., Reg. II
Director, Hazardous Waste Mgmt. Div., Region III
Director, Air & Waste Mgmt. Div.,
Regions IV, VI, VII & VIII
Director, Waste Mgmt. Div., Regions I & V
Director, Toxics & Waste Mgmt. Div., Region IX
Director, Air & Waste Division, Region X

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ATTACHMENT
Interim Procedures for Deleting
Sites from the NPL

Regional Responsibilities

- Determine if site meets one or more deletion criteria.

- Notify local community, State and local officials, and appropriate Federal agencies of intent to delete. In order to meet the June 1 deadline (below), notification statements should be issued by April 15.

  - Notification statement should include:
    - dates of 3 week comment period
    - location of relevant documents
    - address of Regional contact for comments
    - statement that formal 60-day public comment period will follow proposal in Federal Register if decision is made to propose the site for deletion
    - site close out plan (O&M and long-term monitoring program)

- Mail copy of notification statement to HSCD.

- Using the responsiveness summary format provided by Headquarters, Regions will respond to individual commentors and other interested parties.

- Notify Enforcement personnel from Office of Regional Counsel.

- Transmit deletion recommendation from Regional Administrator to AA, OSWER. In order to have a deletion recommendation proposed in the August 1984 update, complete documentation must be received by June 1.

- HSCD may request Regional briefing on technically complex sites.

- Maintain public docket for deletion decision.

Headquarters Responsibilities

- HSCD conducts review and concurrence process.

- Review and concurrence from the following offices:
  - Office of Waste Program Enforcement (OWPE)
  - Office of Enforcement and Compliance Monitoring (OECM)
  - Office of General Counsel-Solid Waste and Emergency Response (OCG-SWER)

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- Following review and concurrence, HSCD prepares Federal Register notice recommending deletion to AA, OSWER through OERR.
- AA, OSWER concurs and forwards Federal Register notice to Administrator via Red Border review process.
- Deletion recommendations proposed in Federal Register.
- Public comments received during 60-day comment period.
- HSCD conducts response to comments and prepares final deletion decision for AA, OSWER through OERR.
- AA, OSWER concurs and forwards deletion decision to Administrator via Red Border review process.
- Deletion decision printed in Federal Register.
- Maintain public docket for deletion decision.

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APPENDIX B
REMEDIAL ACTION MASTER PLAN (RAMP):
SECTIONS 5.0 AND 6.0
WASHBURN SITE, WASHBURN, MAINE
SEPTEMBER 1983

Note: At the time the RAMP was prepared, the site was identified as the Washburn Site. This nomenclature is reflected in Appendix B. The site is now identified as the Pinette's Salvage Yard Site consistent with the name appearing on the National Priorities List. This latter name, Pinette's Salvage Yard Site, will appear throughout this Work Plan.

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5.0 HAZARDOUS SUBSTANCES

5.1 Physical, Chemical and Hazardous Characteristics

5.1.1 Form and Physical State

The hazardous substances found at the Washburn Site were originally contained within transformers in liquid state. The liquid contents of the transformers spilled onto the ground and saturated the soil. Since the soil has sorbed or "soaked up" most of the liquid, the hazardous substances can effectively be handled as a solid or sludge.

5.1.2 Chemical Compounds

The transformers whose contents spilled onto the ground were filled with a commercial dielectric cooling fluid known as Pyranol. Chemical analyses of samples taken from the spill area confirm that Pyranol is a mixture of polychlorinated biphenyl (PCB), dichlorobenzene and trichlorobenzene. The particular PCB detected at the site is Arochlor 1260 which is a chlorobiphenyl isomer containing approximately sixty percent by weight of chlorine.

5.1.3 Hazardous Characteristics

PCB's such as Arochlor 1260 are toxic if ingested or inhaled in sufficient quantities. Direct skin contact may result in a form of acne. Of greater health significance, though, is the stability of PCB's and their ability to accumulate within living tissue. Once released to the environment, PCB's will persist almost indefinitely unless physically removed. This characteristic increases the chance that PCB's may enter the human food chain. Once ingested, PCB's will accumulate within the body and possibly build to toxic levels. For this reason, PCB contaminated soil should not be used to cultivate food crops or graze livestock.

Dichlorobenzene and trichlorobenzene are toxic if ingested or inhaled and may result in damage to the lungs, liver or kidneys. The chlorobenzene compounds are

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irritating to eyes and mucous membranes and may cause dermatitis if in direct contact with the skin.

5.2 Source, Quantity, Location and Concentrations

The only known source of contamination at the Washburn Site are the three transformers whose contents (Pyranol) were spilled onto the ground. Although the possibility of other substances being dumped on the site also exists, there is no current information to support other sources of contamination.

The quantity of PCB-contaminated oil spilled at the site is estimated to be 780 gallons. This determination is based upon existing information (see references) which suggest that each of the three transformers contained approximately 260 gallons of Pyranol.

The approximate areal extent of the bulk spill of PCB-contaminated oils is noted in Figure 2-2. Analyses of soil samples taken in the spill area reveal that the soil at the surface contains about 20,000 parts per million (ppm) of PCB. (The unit parts per million is often expressed in metric units as milligrams of contaminant per kilogram of soil or (mg/kg). The soil at a depth of 24 inches contains approximately 3500 ppm (mg/kg) of PCB.

Lesser amounts of contamination are present in the soil and sediments outside of the spill area. About 20 to 30 feet south of the spill at a 3 foot depth, 7 ppm (mg/kg) of trichlorobenzene was found. Similar levels of trichlorobenzene were detected 30 to 40 feet east and southeast of the spill at varying depths. Some contamination is also evident near the storage shed which lies about 60 feet northeast of the spill. Here both PCB and trichlorobenzene were found in maximum concentrations of 1.8 and 4.2 ppm or (mg/kg), respectively. In the drainage ditch along Gardiner Creek Road, PCB was detected at a relatively higher concentration of 172 ppm (mg/kg). Soil near the groundwater breakout or spring observed on the slope across the road leading to the Aroostook River showed a PCB concentration of 0.5 ppm (mg/kg).

The appearance of contaminants near the shed may have been caused by the dragging of the contaminated parts of the three disassembled transformers there. The detection of hazardous substances outside of the spill area, especially the drainage ditch sediments, may be due to surface erosion of the soil by rainfall and subsequent migration.

Groundwater from nearby drinking water wells and surface waters in the vicinity show no detected amounts of PCB, dichlorobenzene or trichlorobenzene except for the water in the drainage ditch along Gardiner Creek Road. Water in the drainage ditch was shown to contain 0.005 ppm or milligrams per liter (mg/l) of PCB. Sampling locations are depicted in Figure 6-1 and all analytical data is tabulated in Table 6-1.

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6.0 ENVIRONMENTAL CONCENTRATIONS

6.1 Air

Polychlorinated biphenyl compounds have a low vapor pressure and, therefore, do not readily volatilize or cause air contamination. Trichlorobenzene and dichlorobenzene, however, are somewhat more volatile and, if present in sufficient quantities, could present an air contamination problem. The lack of air contamination within the spill area was confirmed by air monitoring conducted with a photoionization detector at the undisturbed soil-air interface. Readings taken at the soil and air interface of disturbed soil in the area of gross contamination showed only 8 parts per million (ppm). A few inches away from the disturbed soil, no hydrocarbons were detected. Most of the di- and trichlorobenzene contained in the transformers probably volitalized shortly after the spill occurred so that the potential for air contamination is slight. Thus, it appears that no significant air contamination is present at the site.

6.2 Soil

Obvious soil contamination in the spill area was present and was confirmed by sampling prior to installation of the cap. Table 6-1 summarizes the results of these sample analyses. PCB contamination was found to be greatest at the soil surface (as high as 58,000 ppm or mg/kg) but was less pronounced at a depth of 24 inches (3,533 ppm or mg/kg). No analytical data exists which defines the levels of dichlorobenzene and trichlorobenzene within the soil of the spill area. However, levels for these compounds would be expected to be less than the levels of PCB found, given the composition of Pyranol and the volatility of the chlorobenzenes.

Sample analysis of soils outside the spill area revealed significantly less contamination. Analyses were performed for both PCB and trichlorobenzene for most of the samples indicating concentrations generally in the range of 0 to 10 mg/kg. A soil sample of the surface of the drainage ditch along Gardiner Creek Road, however, showed a relatively high concentration of PCB (172 ppm or mg/kg). This result indicates that wastes may have migrated somewhat from the spill area.

TABLE 6-1

WASHBURN ANALYTICAL SUMMARY

A. Soil Sampling within the Spill Area

Sample* Designation	Sampling Date	Laboratory	Analytical Results (ppm or mg/kg) PCB Arochlor 1260	Trichloro-benzene	Dichloro-benzene	Description/Location
S-1	4/80	MEDEP, Augusta	58,000	NA	NA	Surface soil
S-2	4/80	MEDEP, Augusta	30,000	NA	NA	Surface soil
S-3	11/82	Unknown	3,533	NA	NA	Soil at 24-inch depth
S-4	11/82	Unknown	22,900	NA	NA	Surface soil
S-5	12/82	USEPA	16,900	NA	NA	Surface soil
S-6	12/82	USEPA	17,400	NA	NA	Surface soil

B. Soil Sampling Outside the Spill Area

S-7	4/80	MEDEP, Augusta	ND	NA	NA	Surface soil, location unknown
S-8	7/81	MEDEP	ND	7.0	NA	Soil south of the spill at 3-foot depth
S-9	7/81	MEDEP	ND	11.0	NA	Soil southeast of spill at 7-foot depth
S-10	7/81	MEDEP	ND	7.4	NA	Soil east of spill at 4-foot depth
S-11	7/81	MEDEP	0.9	4.2	NA	Soil south of shed at 1.5-foot depth
S-12	7/81	MEDEP	1.8	0.6	NA	Soil south of shed at 4-foot depth
S-13	7/81	MEDEP	0.6	0.2	NA	Soil west of spill at 0.2 foot depth
S-14	11/82	Unknown	0.5	NA	NA	Surface soil near groundwater breakout
S-15	11/82	Unknown	172	NA	NA	Surface soil in drainage ditch along road

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TABLE 6-1
WASHBURN ANALYTICAL SUMMARY
PAGE TWO

C. Groundwater Sampling

Sample* Designation	Sampling Date	Laboratory	Analytical Results (ppm or mg/l) PCB Arochlor 1260	Trichloro-benzene	Dichloro-benzene	Description/Location
W-1	7/81	MEDEP	ND	ND	ND	Roger Pinette well
W-2	7/81	MEDEP	ND	ND	ND	Rita Pinette well
	12/82	USEPA	ND	NA	NA	
W-3	7/81	MEDEP	ND	ND	ND	F. A. Drost well
W-4	7/81	MEDEP	ND	ND	ND	Washburn town water
W-5	7/81	MEDEP	ND	ND	ND	Ella Dahlgren well
W-6	7/81	MEDEP	NA	2.3	0.18	Southeast of spill at 7-foot depth

D. Surface Water Sampling

SW-1	7/81	MEDEP	ND	ND	ND	"Pond behind Pinette's"
SW-2	12/82	USEPA	0.005	NA	NA	Water in drainage ditch
SW-3	7/81	MEDEP	NA	ND	ND	"Stream below Pinette's" (Aroostook River)

NA: Not Analyzed
ND: Not Detected
* The approximate locations of the sampling points are shown in Figure 6-1 by their sample designation.

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Locations of all sampling locations are shown on Figure 6-1.

6.3 Groundwater

No monitoring wells have been installed on site, so the presence and extent of groundwater contamination is unknown. However, as shown in Table 6-1, samples taken from shallow drinking water wells located nearby revealed no contamination.

6.4 Surface Water

Three surface water samples were collected and analyzed. The samples designated as the "Stream Below Pinette's" (believed to refer to the Aroostook River) and the "Pond Behind Pinette's" showed "Not detected" for PCB, dichlorobenzene and trichlorobenzene. Surface runoff water that drained from the site to the drainage ditch running alongside Gardiner Creek Road showed a trace of contamination (0.005 ppm or mg/kg of PCB). See Table 6-1. With the installation of the cap in December 1982, further surface migration of the wastes should be mitigated.

6.5 Biota

Prior to the installation of the cap, an obvious area of dead grass outlined the extent of gross contamination. No other areas of stressed vegetation or adverse ecological effects were noted during the site inspections. However, no specific plant or animal studies were undertaken to assess the effect of the spill upon the local biota. It was noted, that the area to the south of Gardiner Creek Road had been cultivated or used as pasture. Since the potential for migration of the wastes still exists (particularly through groundwater seeps or springs) this area may become affected.

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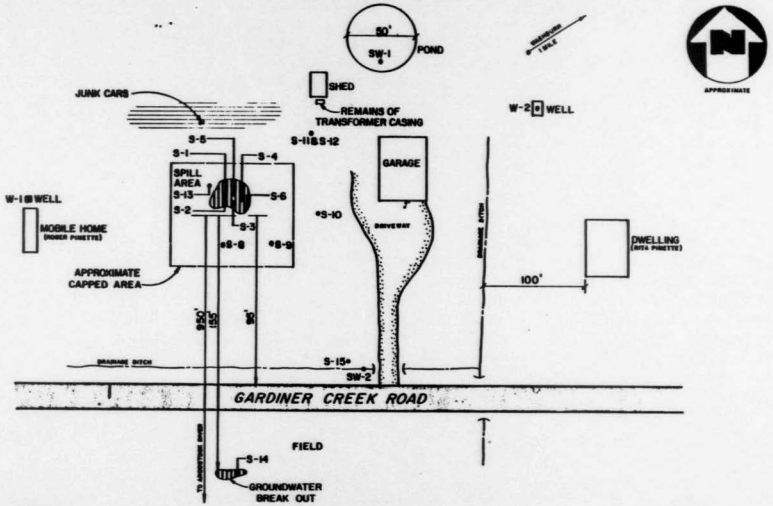

WASHBURN SITE SKETCH
NOT TO SCALE

FIGURE 6-1

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APPENDIX C
EXCERPTS FROM THE ON-SCENE COORDINATOR'S REPORT OF IMMEDIATE REMOVAL ACTIVITIES AT THE PINETTE'S SALVAGE YARD SITE

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Part A

Summary of Events

1979

In February of 1979, Loring Air Force Base, located in Limestone, Maine, replaced several substation transformers. Several of the former Air Force transformers were brought to the Pinette Salvage Yard in Washburn, Maine (see Maps, Attachments 1, 2, and 3), where they were dismantled for the value of the metals contained. Approximately 800 gallons of PCB dielectric fluid was released onto the ground during the salvage process.

1979-1982

In November 1979 the Maine Department of Environmental Protection (DEP) began conducting an investigation. Samples of soil were obtained which indicated that PCB contamination was present. The analysis indicated from 30,000 ppm to 58,000 ppm of the Arochlor 1260 formulation (see Attachment #4, Randall Memo).

Further samples were obtained and analized in 1981 (see Attachment #5, Potter Memo). These results provided confirmation of the soil contamination and indicated that transformer oil was present on the groundwater with approximately 80% Arochlor 1260 content.

Exceptionally severe weather, during this period, increased concern over possible migration and contamination of nearby private wells. The Maine DEP requested Air Force assistance in removal of the material, after determining the the Air Force was the generator. The MeDEP requested that the USEPA assist the DEP in discussions with the Air Force, and in developing plans for performing a cleanup operation at the site (see Attachments #6, Correspondence).

1982-1983

The USEPA and the Maine DEP conducted joint investigations of the site leading to the site's listing on the National Priority List [see Attachments #7, #8, and #9; Sampling Inspections (Attachments #7 and #9), Site ranking letter (Attachment #8)].

The Maine Department of Environmental Protection placed a clay and plastic cap over the discharge area as an interim measure to forstall further affects by precipitation on the contaminated area (see Attachment #10, Varney Memo).

A Remedial Action Master Plan was developed after further investigation was completed in 1982.

Due to a lack of funds for conducting a hazardous waste cleanup, Maine requested that the USEPA conduct an Immediate Removal operation at the site.

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Summer, 1983	After reviewing the available information, and performing a site visit, On-Scene Coordinator Carl Eidem determined that an Immediate Removal action was appropriate. An Immediate Removal was scheduled for the Fall of 1983.
4 October 1983	Mr. Michael DeLand, Regional Administrator, authorized an Immediate Removal action at the Pinette Salvage Yard. He authorized a ceiling of $200,000 for the operation. (see Attachment 11, Notification of Immediate Removal).
7 October 1983	Mr. Donald Berger, an On-Scene Coordinator, as an Emergency Contracting Officer, executed Notice to Proceed 68-91-0012 with Inland Pollution Control, Inc., of Braintree Massachusetts. The Notice to Proceed was entered into after negotiations had been conducted between Ms Donna Tolliver, USEPA Headquarters Contracting Officer, and Mr. Paul Conners, Inland Pollution Control (IPC) Vice President (See Contract and Financial Affairs, Appendix I, Section 1).
12 October 1983	Mr. Donald Berger, accompanied by Mr. Henry Aho, Maine Superfund Coordinator, briefed Washburn, Maine officials on the proposed removal action. Polrep #1 wast transmitted (see Appendix V, Polrep #1).
16 October 1983	Inland Pollution Control (IPC) began mobilization at the site. Arrangements were made for security to be provided by off-duty local policemen, and the Town of Washburn provided IPC with its reserve fire engine, subject to fire emergency needs, for the duration of the project.
17 October 1983	Mr. Donald Berger, the On-Scene Coordinator, USEPA Air Monitoring and Laboratory personnel, the Centers for Disease Control liason officer, Roy Weston TAT person, and the contractor completed site mobilization and prepared facilities and equipment for operations.
18 October 1983	Exploratory excavation, sampling, and analysis began. This day's activities were to define the zone, under the clay and plastic cap, where PCB contamination was located. 39 samples, ranging from "Nothing Detected" to 7,606 ppm were found (See Appendix II, Removal Sampling Information and Appendix III, Daily Activity Reports). The On-Scene Coordinator, assisted by the Washburn Town Manager, made the site available to the news media. David W. Tordoff, USEPA, arrived as the prospective On-Scene Coordinator.
19 October 1983	Exploratory excavation, sampling, and analysis continued to define the zone of contamination. Further analysis

was performed on samples obtained from testpits excavated downgradient from the zone of contamination, and from hand-dug pits in low land, which appears to be seasonal groundwater breakout points, south of Wade Road. An air monitoring investigation was also conducted (see Appendix II, Section 2).

Excavation and loading of contaminated soil for transport to the SCA Chemical Services Model City, New York, disposal facility began.

73 samples, ranging from 1 ppm to 5,728 ppm, were obtained. One sampling site, labeled S-23, was a test pit excavated to a depth of 13 feet, which indicated that a significant layer of marine type clay underlay the site (Appendix II, Sections 1 and 3).

5 loads, approximately 99.69 tons, were shipped to Model City for disposal (See Appendix IV, Manifests).

20 October 1983 Mr. Tordoff assumed the duties of On-Scene Coordinator from Mr. Berger.

An increase in the ceiling to $250,000 was requested of the Regional Administrator by Messrs Tordoff and Berger, in order to assure sufficient funding through the next week.

Sampling continued in the excavation to maintain the definition of the zone of contamination as excavation and stockpiling of contaminated soil continued. 31 samples, ranging from less than 5 ppm to 534 ppm, were obtained (Appendix II, Section 1).

4 loads, approximately 74.54 tons, were shipped to Model City for disposal (Appendix IV).

Two testpits were excavated, near the contaminated area, to inspect, further, the geology underlying the site. These pits indicated that 6 feet of gray clay was present under the site (Appendix II, Section 3, Excavation Logs

Due to the infiltration of groundwater into the excavation, the OSC directed that an interception trench be dug, upgrade of the contaminated area, and that water be pumped away from the excavation.

21 October 1983 Excavation and sampling continued. Eight samples, ranging from less than 5 ppm to 1360 ppm PCB were obtained (Appendix II, Section 1).

Two additional test pits were excavated, confirming the presence of the layer of clay (Appendix II, Section 3).

5 loads, approximately 97.5 tons, were shipped to Model City

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for disposal (Appendix IV).

Mr Berger, the CDC liason officer, and USEPA air monitoring personnel returned to the Regional Office.

Mr. Tordoff was informed that the new ceiling had been approved by the Regional Administrator.

22 October 1983 — Excavation, stockpiling, and sampling related activities were conducted for a half day. 25 samples, ranging from less than 5 ppm to 1881 ppm PCB were obtained (Appendix II, Section 1).

One test pit was excavated and confirmed that a clay layer underlay the site (Appendix II, Section 3).

24 October 1983 — Excavation, and sampling to maintain the definition of the zone of contamination, continued. 11 samples, ranging from less than 5 ppm to 2347 ppm PCB, were obtained.

Ms Kathy Swanson, representing U.S. Senator William Cohen, Mr. Carl Allen, Me DEP, and representatives of the press toured the site and were briefed by the On-Scene Coordinator.

5 loads, approximately 98.45 tons, were shipped to Modal City for disposal.

25 October 1983 — Excavation of contaminated soil and sampling operations continued. Prior to 1430, 7 samples, ranging from less than 5 ppm to 2293 ppm PCB, were obtained. Approximately 1430, a very distinct mineral oil odor was noticed near the open excavation. Mark Sutton, Roy Weston, Inc. (RWI), a contractor to the USEPA, observed a clear viscous sheen eminating from the northeasterly wall of the excavation about three feet above the gray clay floor. The initial oil/soil sample indicated 36,000 ppm of PCB. A second sample, predominently oil, indicated 15%-20% PCB. This sample could not be further defined, due to the calibration standards available to the chemist (Appendix II, Section 1).

At 1520, the OSC reported the presence of the oil to the USEPA, Lexington Laboratory. The OSC's superiors were requested to prepare the necessary request for additional funding. Inland Pollution Control was requested to provide a portable oil/water separator, sorbents, full face respirators for its crew, laboratory support equipment for water analysis from the USEPA's New England Regional Laboratory, and other materials deemed necessary for safety and control of the oil.

The local television station's news team was on-site and was briefed on current operations.

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A message was left for the Headquarter's Contracting Officer, alerting her to the situation and informing her that a request for another ceiling increase should be expected.

5 loads, approximately 98.24 tons, were shipped to Model City for disposal (Appendix IV).

Polrep #2 was transmitted (see Appendix V, Polrep #2).

26 October 1983 Exploratory excavations were begun to redefine the zone of contamination, as necessary, based on the oil found on 25 October. This necessitated the careful removal of clean surface soil, sampling, analizing, and continued excavation until a new boundary for the contamination was reached. Generally the oil was found in a layer of coarse gravel immediately above the clay layer. On the upgradient(northerly) side this layer was at a depth of about six feet; while downgradient, the layer was at a depth of about 5 feet. The Northeasterly to Southeasterly quadrant of the excavation required enlarging, with only small adjustments in the westerly portion being necessary.

24 soil samples were obtained, ranging from less than 5 ppm to 2000 ppm PCB. One of these samples indicated a contaminated point in the groundwater interception trench, necessitating the excavation of a new trench further upgrade (Appendix II, Section 1).

USEPA, Lexington, was contacted and a ceiling clearance to $400,000 was requested.

2 loads, approximately 42.16 tons, was shipped to Model City for disposal (Appendix IV).

2 samples, Lab Codes: #75627 and #75628, consisting of water from the initial interception trench and from Mrs Rita Pinette's household well, respectively, were sent to the Lexington laboratory for analysis (Appendix II, Section 4, Drinking Water Analysis).

27 October 1983 Excavation, on-site stockpiling, and sampling activities continued. 17 Samples, ranging from less than 5 ppm to 2108 ppm PCB, were obtained (Appendix II, Section 1).

The OSC confirmed, with the Region I Surveillance Branch Chief, that the ceiling increase was necessary to complete operations.

Town Manager Richardson was briefed on the need for further operations. Telephone breifings were conducted with the State Superfund Coordinator, USEPA Headquarters, and Ms Swanson, of Sen. Cohen's Presque Isle office.

2 loads, approximately 37.38 tons, were shipped to Model

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City for disposal (Appendix IV).

28 October 1983 — Excavation and sampling operations continued to remove the remaining contaminated soil. Liquid oil was skimmed off the infiltrating water, in the excavation, into the portable oil/water separator. Sorbents were added to the tanks. Sorbent pads and blankets were placed in the excavation, and more sorbents were placed so as to provide walkways and paths, in order to keep personnel and equipment from contacting PCB oil and heavily contaminated soil.

10 soil samples, ranging from less than 5 ppm to 127 ppm PCB, were obtained. In addition, stones, from the vehicle decontamination station, were analized and found to be contaminated by <5 ppm PCB (Appendix II, Section 1).

2 loads, approximately 41.58 tons, were shipped to Model City for disposal (Appendix IV).

The On-Scene Coordinator and the IPC job supervisor estimated that operations would have to be secured on Tuesday, 1 November, due to the expenditure of all funds, except those necessary for security and per diem. The OSC contacted USEPA, Lexington, and was informed that the ceiling increase to $400,000 had been approved by the Regional Administrator, and was enroute to Headquarters. USEPA, Lexington, and Headquarters were informed, by the OSC, that funds for per diem and security, only, would be available after 31 October.

29 October 1983 — Half a day of operations to stockpile contaminated soil were conducted. 13 soil samples were obtained indicating, from less than 5 ppm to 9 ppm PCB, were obtained. One sample indicated 72 ppm PCB (Appendix II, Section 1).

31 October 1983 — Excavation, stockpiling, and sampling operations continued. Nine samples were obtained from the excavation and soil stockpile. Excavation samples ranged from less than 5 ppm to 32 ppm PCB. Three samples from the base of the stockpile indicated 90, 331, and 518 ppm. A sample from mid-level on the stockpile indicated 530 ppm. The OSC determined that no further excavation was necessary (Appendix II, Section 1).

Inspection of the infiltration water indicated that no further oil was entering the excavation. An estimated 50 to 60 gallons of transformer oil had been removed with sorbents. A sample was obtained from the water in the excavation and indicated 110 ppb PCB. Samples from the prtable oil/water separator indicated 50 ppb and 700 ppb PCB. Fresh sorbents were added to the compartments of the separator. Sampling and analytical operations were secured.

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Five loads, approximately 103.98 tons, were shipped to Model City for disposal (Appendix IV).

1 November 1983 — 5 loads, approximately 100.90 tons, were shipped to Model City for disposal (Appendix IV).

* Due to the lack of funds, operations were secured at 1600. Only security and per diem were authorized by the OSC.

At 1730, the OSC was informed that the ceiling had been cleared to $400,000 by Headquarters. The IPC supervisor was informed that operations were to resume at 0700, 2 November.

2 November 1983 — Four loads, approximately 83.64 tons, of contaminated soil was shipped to Model City for disposal.

Town Manager Richardson was briefed on operations, and on the anticipated completion of seeding, scheduled for 4 November. USEPA, Lexington, and Headquarters Emergency Response Division were briefed, by telephone, on the schedule of operations. Messages were left for the Maine Superfund Coordinator, and the Headquarters Contracting Officer concerning the schedule.

Pumping operations were secured at the interception trench. The contractor used clean fill, stockpiled during earlier operations, to backfill the trench and a portion of the excavation. The portable oil/water separator was dewatered to the excavation. The portable Photo-Vac GC and other analytical equipment was shipped to the USEPA's Lexington, Massachusetts Laboratory.

3 November 1983 — Five loads, approximately 107.14 tons, were shipped to Model City for disposal (Appendix IV).

At 1310, Driver T. Smith, IPC, was injured when a bungy cord hook, used to secure the tarpaulin over his load, slipped, allowing the hook to penetrate the skin near his eye. The casualty was given first aid and transported to the Washburn Regional Health Center. After treatment at the Health Center, he was transported to the Arthur Gould Memorial Hospital. Later in the day, Smith returned to the site for transportation back to his base.

Approximately 170 cubic yards of bank-run fill was used to fill part of the excavation.

4 November 1983 — The final three loads of contaminated soil, polyethylene liner, and under soil, approximately 60.99 tons, were shipped to Model City for disposal (Appendix IV). The OSC, while reviewing manifests, noted that license Me-HWT-830111C17 had not been signed by the issuing officer. The OSC signed "For Henry Aho", after consultation with Mr. Richard Baker of the MeDEP's licensing division.

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The crushed stone and liner of the Vehicle Decontamination Station was used as backfill for the excavation. An additional 220 cubic yards of bank-run gravel was supplied and used to complete the backfill operation.

Grading of the site was completed at noon. Generally, the site was graded to allow runoff to flow, southwesterly, as had been the case prior to the installation of the cap.

40 bushels of hay was spread, by hand, over the area which had been disturbed by the removal action.

Upon completion of the hay application, the crew cleaned, stowed, and prepared equipment for transportation. All activities were completed by 1600.

The OSC briefed the Town Manager and some of the news media, by telephone, on the completion of operations, and departed the area by 1700.

5 November 1983 — Inland Pollution Control, Inc., personnel demobilized to their Braintree, Massachusetts facility.

14 November 1983 — Polrep #3, and final (mislabeled #2, and final) was transmitted closing the removal action (Appendix V).

The On-Scene Coordinator received, from Mr. Paul Connors, invoice #1642, in the amount of $365,000.41.

21 November 1983 — The On-Scene Coordinator certified and submitted Invoice #1642, with exceptions, to the desbursing office at R.T.P., North Carolina. Copies of the certified invoice and cover letter were forwarded to the Contracting Officer at the USEPA's Headquarters (See Appendix I, Section 2).

28 February 1984 — At the request of the USEPA's Superfund Coordinator, the OSC submitted to the Regional Waste Management Division a memo noting his final observations (See Attachment 12, Final Observation Memo).

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PART B

Effectiveness of Removal Actions

Neither the property owner, the transporter, the salvor of the transformers, nor the U.S. Air Force, participated in this immediate removal action.

The Maine Department of Environmental Protection provided preliminary investigation and temporarily secured the site with a polyethylene, clay, and soil cap. During the removal, the Maine DEP provided assistance by expediting hazardous waste license and manifest requirements for the contractor to operate in this State. The State of Maine also provided a local DEP representative with knowledge of previous State operations at the site.

The Town of Washburn placed a fire truck at the disposal of the United States. This piece was used to provide the water necessary for vehicle decontamination. Local off-duty police officers served as the security personnel when the OSC and contractor personnel were not on-scene. The Town Manager coordinated, for the On-Scene Coordinator, information to the news media and the community. In addition to the direct assistance provided by the town, the Police Chief and Town Manager were able to provide the Inland Pollution Control job supervisor with contacts for local sources of materials and subcontractors for specific equipment that became necessary, from time to time. This assistance was particularly useful in finding a subcontractor who could provide backfill, and deliver it in a timely fashion. The project was conducted after the construction season had been completed in this part of Maine. The subcontractor reopenned a gravel pit and delayed conversion to the snow plow configuration for two weeks, in order to complete our job.

During the operation, personnel from the USEPA Region I Environmental Services Division performed air monitoring and and chemistry laboratory services for the On-Scene Coordinator. The liason officer to Region I, provided by the Centers for Disease Control(Center for Environmental Health) was on scene during the initial days of the operation, and provided the OSC with advice and assistance to assure community safety and site control.

The establishment, on site, of a field laboratory, operated by a USEPA chemist from the New England Regional Laboratory in Lexington, Massachusetts, was a critical and most valuable asset to the On-Scene Coordinator. The ability to have analytical results rapidly, allowed the OSC to "fine tune" the physical excavation of earth within the same hour as samples were obtained. In any area this saves time, labor, and cost. In an area remote from laboratories, the savings become obvious. When, on 25 October, oil was observed eminating from the side wall of the excavation, the ability to receive the analytical information quickly allowed the removal of the clean surface soil to be carried out without developing more contaminated soil than necessary.

Roy F. Weston, Inc., a contractor to the USEPA, provided one representative from its Technical Assistance Team, who served as excavation supervisor. The individual worked well with the cleanup contractor and maintained good control of the excavation through his sampling patterns.

Inland Pollution Control, Inc., the cleanup contractor, provided excellent service, in a timely fashion. The personnel working on this project acted in a professional manner, both in technical and safety related matters. When

oil was observed, IPC responded to the OSC's directions by providing equipment, materials from local sources, as well as their base, in order to bring the oil seepage under control overnight.

Although the job entailed twice the amount of waste estimated. Inland Pollution Control demonstrated the ability to deal with the increased needs for transport and disposal without difficulty.

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PART C

Problems Encountered

The On-Scene Coordinator did not have difficulty operating with town or State officials. As mentioned in Part B, both local and State officials provided direct, and indirect, assistance to the On-Scene Coordinator, and the contractor, that helped the job to proceed without operational problems that might, otherwise, have ocurred when operating in a distant area.

Two problems were encountered. The discovery, partway through the removal, of transformer oil, and the time necessary to obtain the second (to $400,000) project ceiling increase.

The transformer oil was found at a depth of approximately 5 feet, entering the excavation from a coarse gravel/pebble layer above the clay. With PCB dielectric fluid present, substantial potential existed for the removal action to spread contamination over a wider area, leading to an increased volume of soil for disposal and other cost increases.

A relatively slow excavation of the overburden was necessary, accompanied by frequent sampling, in order to reach the level of contamination. This was accomplished by the track-hoe, which required frequent changes between the two available buckets, in order to keep this operation "clean". The first interception trench was found to have some contamination, was excised, and a new trench was dug. This second trench required constant pumping, in order to keep groundwater from infiltrating the extavation which would hamper soil removal and, at the time, was believed to possibly lead to the need for disposal of contaminated water.

The combination of careful excavation, the use of sorbents, groundwater interception, and the pumping of excavation water to a portable oil/water separator (used as a tank with sorbents for oil removal), allowed the immediate removal action to deal with the problems posed by the transformer oil. The OSC and the IPC job supervisor estimated that 50-60 gallons of transformer oil were recovered, as well as the 1,043 tons of contaminated soil.

Although the ceiling increase to $400,000 was approved, 7 days elapsed between the OSC's initial request to his superiors in Lexington, Ma., and USEPA's Headquarter's confirmation. On 25 October the OSC had estimated that $130,000 remained. He requested that the increase be available by 28 October, in order that backfilling and recapping could begin on 31 October (if the increase were denied), or further transportation and disposal could be scheduled. On 28 October, the OSC was informed that the Regional Administrator had approved the increase, but that formal approval from Washington could not be expected until 31 October. The OSC elected to schedule further removal, rather than closure operations, after a discussion with the IPC job supervisor indicated that costs would reach $235,000 to $240,000 at the close of work on Tuesday, 1 November.

On 1 November the OSC, after consultation with Emergency Response Division in Headquarters, cancelled further operations, allowing only security and per diem expenses. The clearance to $400,000 was approved, and the On-Scene Coordinator informed, at 1730. This allowed sufficient time for 4 trucks to be available for loading on 2 November. Completion of site operations by 4 Nov. was not hampered.

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PART D

Recommendations

The intentional discharge of transformer oil onto the ground, by persons knowing, or ignorant, of the ramifications of their actions will probably continue, as long as some value exists for the metals contained in the unit. Tight control and regulation of the material, and strict liability on the originator of the material (in this case transformers taken out of service) is necessary if prevention of this type of incident is to occur.

The On-Scene Coordinator recommends that in future excavations of this type, a series of deep testpits (into groundwater) be dug after the initial release location is defined. These pits should assure that the plume of oil, on the groundwater, will have been properly defined, prior to the commencement of excavation for removal.

Redelegations of authority to the USEPA Regional Administrator, which were made in 1984, included the Regional Administrator's authority to increase, to one million dollars, a project's ceiling. This redelegation effectively deals with the time delay experienced by the On-Scene Coordinator.

The On-Scene Coordinator did not observe any situation requiring the Amendment of the National, regional, or local contingency plans.

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APPENDIX II

Section 1

Excavation Sampling

Results

Removal Sample Information

1. All samples are soil unless noted.
2. Analytical result is in ppm unless noted.
3. ND = Nothing Detected
4. <5 = Less than 5 ppm

Sample	Result	Location		Remarks
		Sample Analysis of 18 October 1983		
W-1	ND?	Under Cap		0 inches
W-2	ND	Below W-1		6 inches
W-3	3	Below W-1		12 inches
DC-1	ND	Vehicle Decontamination		Various depths from
DC-2	ND	Area for all "DC" samples		0 to 10 inches
DC-3	ND	" " " " "		" " " "
DC-4	ND	" " " " "		" " " "
DC-5	ND	" " " " "		" " " "
DC-6	ND	" " " " "		" " " "
DC-7	ND	" " " " "		" " " "
DC-8	ND	" " " " "		" " " "
DC-9	ND	" " " " "		" " " "
DC-10	ND	" " " " "		" " " "
DC-11	ND	" " " " "		" " " "
DC-12	ND	" " " " "		" " " "
DC-13	ND	" " " " "		" " " "
DC-14	ND	" " " " "		" " " "
DC-15	ND	" " " " "		" " " "
W-4	ND	Under Cap	0"	
W-5	ND	" "	0"	
N-6	6	North of Cap	0"	
N-7	9	" " "	0"	
W-8	2	Waste Zone	0"	No liner observed
W-9	30	" "	0"	" " "
W-10	12	Under Cap	6"	Below original sod
W-11	0.5	" "	6"	" " "
W-12	0.5	" "	6"	" " "
TP-1	ND	Under Cap	12"	" " "
TP-2	ND	" "	12"	" " "
W-13	ND	Test Pit A	0"	Test Pit A
W-14	216	" " "	24"	" " "
W-15	ND	Under Cap	6"	Below original sod
W-16	ND	" "	4'	Below original sod -water seeping into pit
W-17	192	" "	6"-12"	Below original sod
W-18	40	" "	"	" " "
W-20	7,606	" "	"	" " "
W-21	2,100	" "	"	" " "
W-22	ND	" "	"	" " "
W-23	ND	" "	"	" " "

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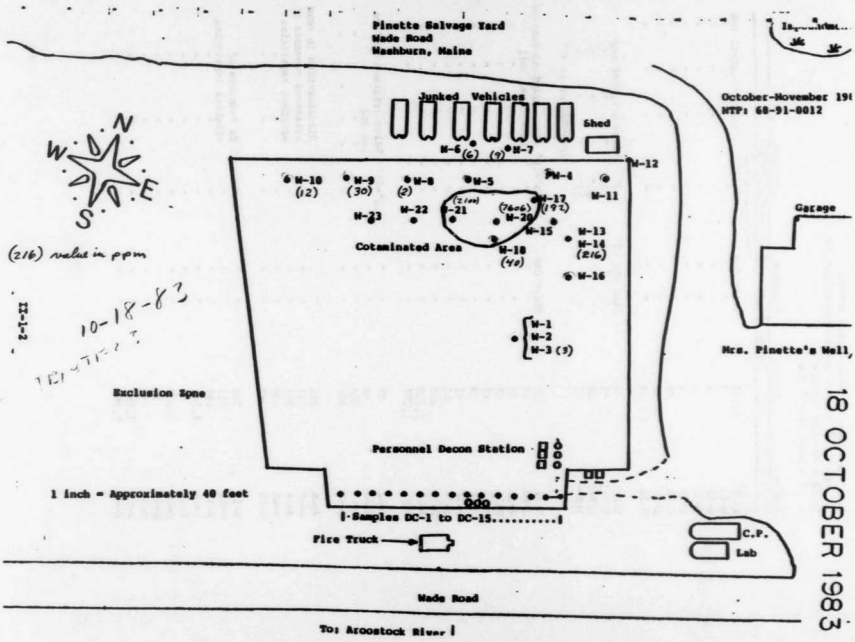

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1. All samples are soil unless noted.
2. Analytical results are in ppm unless noted.
3. ND = Nothing Detected.
4. <5 = Less than 5 ppm

Sample	Result	Location	Remarks
		Sample Analysis of 19 October 1983	
W-19	1,945	Under Cap	6"-12" Below original sod
W-24	2	" "	" " " "
W-25	4	" "	" " " "
W-26	1	" "	" " " "
W-27	1	" "	" " " "
W-28	96	" "	" " " "
W-29	<5	" "	" " " "
W-30	<5	" "	" " " "
TPB-1	<5	Test Pit "B"	0" Below original sod
TPB-2	<5	" " "	10" " " "
TPB-3	ND	" " "	20" " " "
TPB-4	ND	" " "	30" " " "
			Groundwater at 37"
W-31	ND	Under Cap	0"-10" below original surface
W-32	<5	" "	" " Discolored Soil
W-33	<5	" "	" " " "
W-34	<5	" "	" " " "
W-35	<5	" "	" " " "
W-36	<5	" "	" " " "
W-37	<5	" "	" " " "
W-38	240	" "	" " " "
W-39	890	" "	" " " "
W-40	5,728	" "	" " " "
W-41	1,097	" "	" " " "
W-42	87	" "	12"-24" Below original Surface
W-43	49	" "	" And Sod
W-44	184	" "	" " " "
W-45	484	" "	" " " "
W-46	562	" "	" Discoloration in some
W-47	317	" "	" areas--no remnants of
W-48	397	" "	" original vegetation
W-49	499	" "	" " "
W-50	<5	" "	" " "
W-51	540	" "	" No remnants of
W-52	921	" "	" original vegetation
W-53	495	" "	" " "
W-54	1,244	" "	" " "
W-55	<5	" "	" " "
W-56	2,000	" "	" " "
W-57	98	" "	" " "
W-58	<5	" "	" " "
W-59	1,263	" "	" " "
W-60	1,941	" "	" " "

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0087

1. All samples are soil unless noted.
2. Analytical results are in ppm unless noted.
3. ND = Nothing Detected.
4. <5 = Less than 5 ppm.

Sample	Result	Location	Remarks
		19 October 1983 Continued	
W-61	1,956	Under Cap	12"-24" Below original sod
W-62	775	" "	" " " "
W-63	495	" "	" " " "
W-64	493	" "	" " " "
W-65	513	" "	" " " "
S-1	<5	Under Cap	12" below original sod
S-2	<5	" "	" " " "
S-3	<5	" "	" " " "
S-4	<5	" "	" " " "
S-5	<5	" "	" " " "
S-6	<5	" "	" " " "
S-7	<5	" "	" " " "
S-8	<5	" "	" " " "
S-9	<5	" "	" " " "
S-10	<5	" "	" " " "
S-11	<5	" "	" " " "
S-12	<5	" "	" " " "
S-13	<5	" "	" " " "
S-14	15	" "	" " " "
S-16	<5	" "	" " " "
S-17	<5	" "	" " " "
S-18	<5	" "	" " " "
S-19	<5	" "	" " " "
S-20	<5	" "	" " " "
S-21	<5	" "	" " " "
S-22	<5	" "	" " " "
S-23	<5	Test Pit S.W. Corner	4" below surface *
S-24	<5	" " " "	22" below surface †
S-25	<5	" " " "	6' below surface ‡
B-1	<5	bog South of Road	12" below surface
B-2	<5	Bog South of Road	12" below surface

* Sample was loam just under the sod
† Sample was gravel with some loam
‡ Sample was gray clay (fine)

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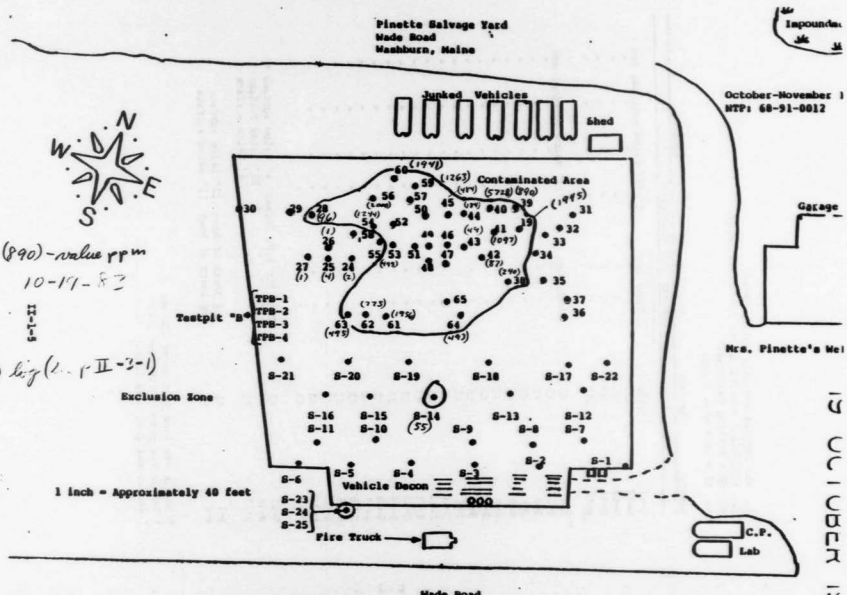
PINETTES SALVAGE YARD
ADMINISTRATIVE RECORD

PIS 002

0088



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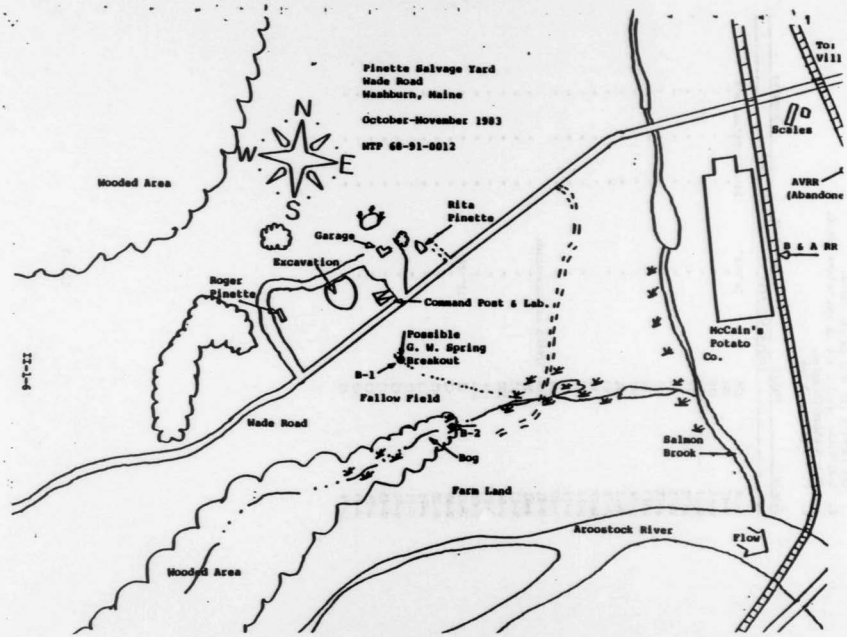
PINETTES SALVAGE YARD
ADMINISTRATIVE RECORD

PIS 002

6800



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PINETTES SALVAGE YARD
ADMINISTRATIVE RECORD

PIS 002

0600

1. All samples are soil unless noted.
2. Analytical results are in ppm unless noted.
3. ND = Nothing Detected.
4. <5 = Less than 5 ppm.

Sample	Result	Location	Remarks
	Sample Analysis of 20 October 1983		
W-66	239	24"-36"	Below original sod
W-67	307	"	"
W-68	410	"	"
W-69	452	"	"
W-70	<5	"	"
W-71	534	"	"
W-72	406	"	"
W-73	82	"	"
W-74	547	"	"
W-75	202	"	"
W-76	<5	"	"
W-77	30	"	"
W-78	<5	"	"
W-79	<5	"	"
W-80	513	"	"
W-81	Vial broken in excavation		
W-82	30	"	"
W-83	502	"	"
W-84	320	"	"
W-85	106	"	"
W-86	444	"	"
W-87	<5	12"-24"	"
W-88	<5	"	"
W-89	<5	"	"
W-90	<5	"	"
W-91	<5	"	"
W-92	<5	"	"
W-93	<5	"	"
W-94	<5	"	"
W-95	<5	"	"
W-96	<5	"	"

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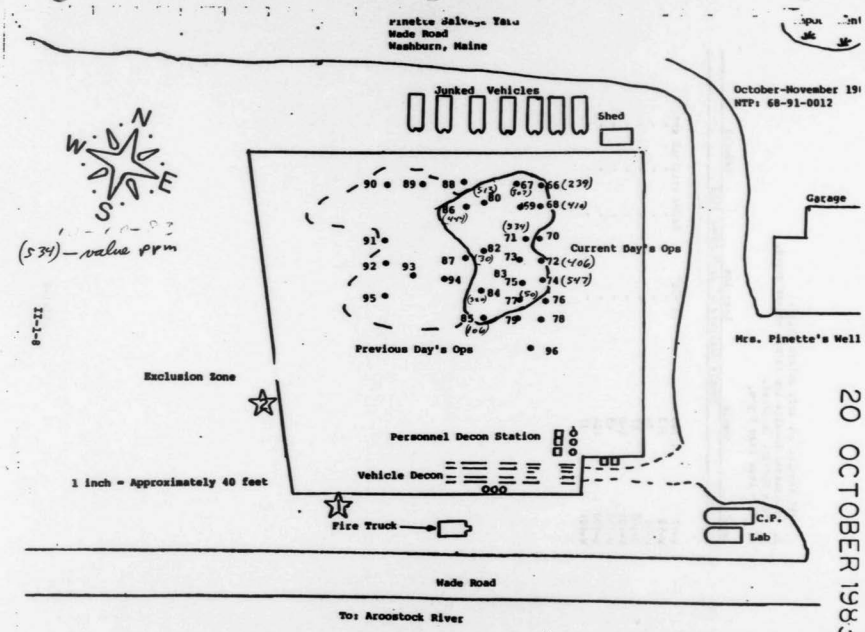
0091



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PINETTES SALVAGE YARD
ADMINISTRATIVE RECORD

PIS 002

2600

1. All samples are soil unless noted.
2. Analytical Results are in ppm unless noted.
3. ND = Nothing Detected.
4. <5 = Less than 5 ppm.

Sample	Result	Location	Remarks
	Sample Analysis of 21 October 1983		
W-97	1,360	24"-36"	Below original sod
W-98	312	"	"
W-99	34	"	"
W-100	87	"	"
W-101	140	"	"
W-102	<5	"	"
W-103	124	"	"
W-104	17	"	"

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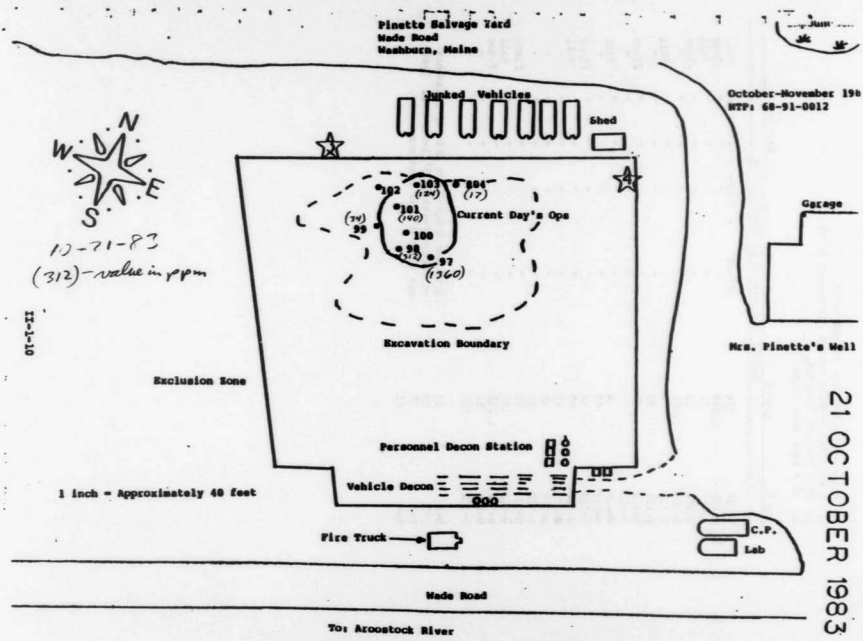
PINETTES SALVAGE YARD
ADMINISTRATIVE RECORD

PIS 002

0093



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PINETTES SALVAGE YARD
ADMINISTRATIVE RECORD

PIS 002

h600

1. All samples are soil unless noted.
2. Analytical results are in ppm unless noted.
3. ND = Nothing Detected.
4. <5 = Less than 5 ppm.

Sample	Result	Location	Remarks
	Sample Analysis of 22 October 1983		
W-105	976	36"-48"	Below original sod Wall
W-106	3,526	"	" " " Floor
W-107	21	"	" " " Wall
W-108	33	"	" " " Floor
W-109	1,881	"	" " " "
W-110	8	"	" " " Wall
W-111	33	"	" " " "
W-112	<5	"	" " " Floor
W-113	<5	"	" " " "
W-114	<5	"	" " " Wall
W-115	<5	"	" " " "
W-116	<5	"	" " " Floor
W-117	<5	"	" " " Wall
W-118	<5	"	" " " "
W-119	<5	"	" " " "
W-120	<5	"	" " " "
W-121	<5	"	" " " Floor
W-122	136	"	" " " Wall
W-123	1,131	"	" " " Floor
W-124	21	"	" " " "
W-125	439	"	" " " "
D-1	<5	Drainage Ditch-North Side of Road-West of driveway-about 15' intervals. Depth was about 6". In loam under sod.	
D-2	<5		
D-3	<5		
D-4	<5		

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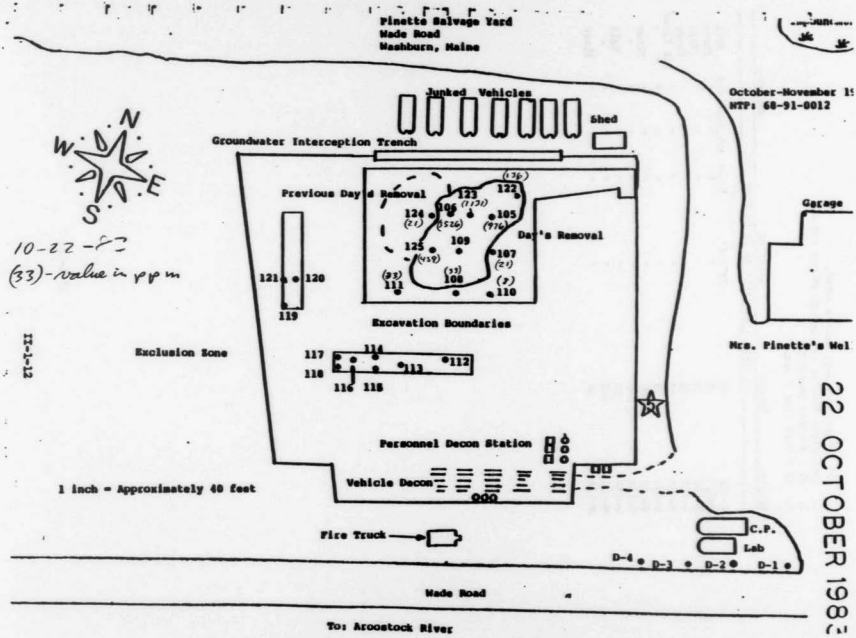

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PINETTES SALVAGE YARD
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9600

1. All samples are soil unless noted.
2. Analytical results are in ppm unless noted.
3. ND = Nothing Detected.
4. <5 = Less than 5 ppm.

Sample	Result	Location	Remarks
		Sample Analysis of 24 October 1983	
W-126	<5	36"-48" Below original sod	Wall
W-127	<5	" " "	Floor
W-128	<5	" " "	Wall
W-129	28	" " "	Floor
W-130	<5	" " "	Pit Floor
W-131	28	" " "	"
W-132	329	" " "	Floor
W-133	2,347	" " "	"
W-134	22	" " "	Wall
W-135	243	" " "	"
W-136	49	" " "	Floor

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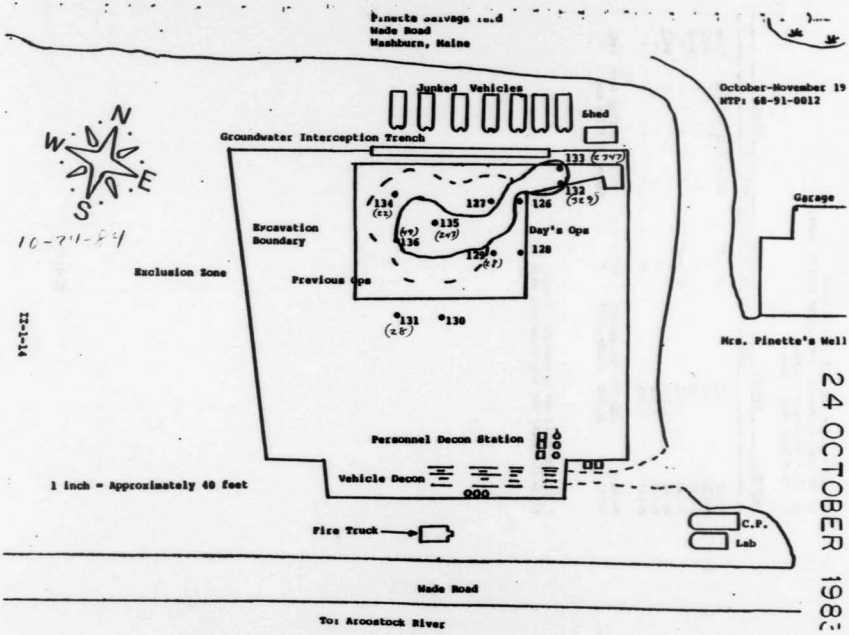
0097



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PINETTES SALVAGE YARD
ADMINISTRATIVE RECORD

PIS 002

8600

1. All samples are soil unless noted.
2. Analytical results are in ppm unless noted.
3. ND = Nothing Detected.
4. <5 = Less than 5 ppm.

Sample	Result	Location	Remarks
	Sample Analysis of 25 October 1983		
W-137	10	36"-48"	Below original sod Floor
W-138	<5	"	" " Wall
W-139	<5	"	" " Floor
W-140	1,075	48"-60"	" " "
W-141	1,266	"	" " Wall
W-142	1,038	"	" " "
W-143	2,293	"	" " "
W-144 *	15%-20% (Estimated)	60"	Oil emnating from Wall
W-145 †	36,000 (Estimated)	"	Below original sod "

* Sample W-144 was predominantly oil.
† Sample W-145 was soil saturated with oil.

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PINETTES SALVAGE YARD ADMINISTRATIVE RECORD
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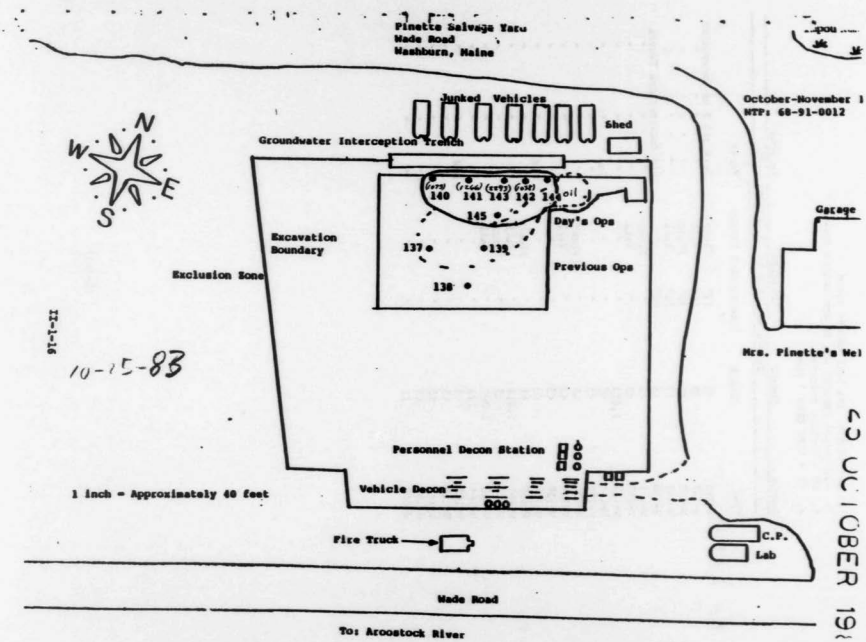
0099



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PINETTES SALVAGE YARD
ADMINISTRATIVE RECORD

PIS 002

0010

1. All samples are soil unless noted
2. Analytical results are in ppm unless noted.
3. ND = Nothing Detected.
4. <5 = Less than 5 ppm.

Sample	Result	Location		Remarks
Sample Analysis of 26 October 1983				
IT-1	230ppb	Interception Trench	Floor	Water
W-146	<5	72"	Floor	Test pit 3 of Excavation
W-147	25	60"	Wall	" " " "
W-148	<5	60"	Floor	" " W "
W-149	<5	72"	Wall	" " " "
W-150	<5	60"	"	Old Interception Trench
W-151	<5	"	Floor	" " "
W-152	<5	"	Wall	" " "
W-153	1,825	"	"	" " "
W-154	<5	"	"	New " "
W-155	<5	"	"	" " "
W-156	<5	"	Floor	" " "
W-157	<5	"	Wall	" " "
W-158	<5	"	"	" " "
W-159	<5	"	"	Old "
W-160	41	"	Floor	" "
W-161	1,816	"	Wall	" "
W-162	<5	"	Floor	" "
W-163	2,000	"	Wall	" "
W-164	126	"	"	" "
W-165	<5	"	"	New "
W-166	<5	"	"	" "
W-167	<5	"	"	" "
W-168	<5	"	"	" "
W-169	11	"	"	" "

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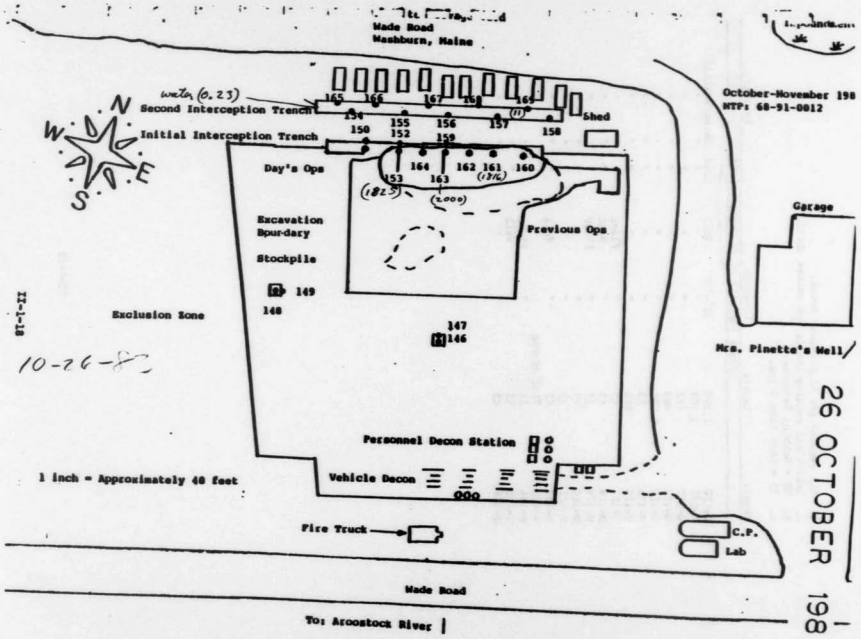

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PINETTES SALVAGE YARD
ADMINISTRATIVE RECORD

PIS 002

2010

1. All samples are soil unless noted.
2. Analytical results are in ppm unless noted.
3. ND = Nothing Detected.
4. <5 = Less than 5 ppm.

Sample	Result	Location		Remarks
	Sample Analysis of 27 October 1983			
W-170	1,300	60"-72"	Wall	From the excavation
W-171	2,108	"	"	"
W-172	763	"	"	"
W-173	409	"	"	"
W-174	1,238	"	"	"
W-175	25	"	"	"
W-176	846	"	"	"
W-177	<5	"	Floor	"
W-178	<5	"	Wall	"
W-179	13	"	Floor	"
W-180	<5	"	"	"
W-181	<5	"	"	"
W-182	<5	"	Wall	"
W-183	Vial broken			
W-184	31	"	Floor	"
W-185	<5	"	Wall	"
W-186	<5	"	"	"

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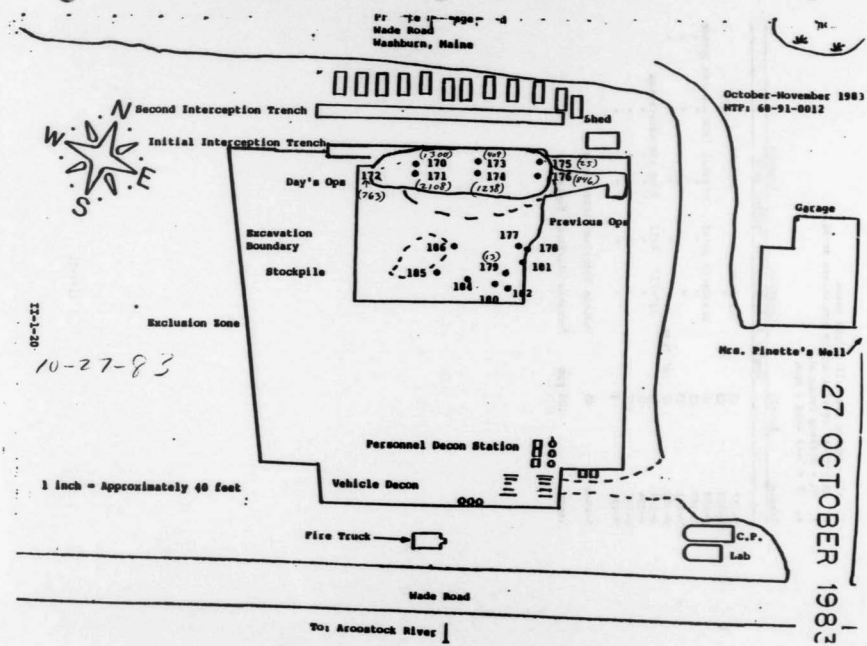
0103



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PINETTES SALVAGE YARD
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PIS 002

1. All samples are soil unless noted
2. Analytical results are in ppm unless noted.
3. ND = Nothing Detected.
4. <5 = Less than 5 ppm.

Sample	Result	Location	Remarks
		Sample Analysis of 28 October 1983	
W-187	<5	Driveway	Surface
W-188	<5	"	"
W-189	10	Discharge point	Original Interception Trench
W-190	<5	" "	" " "
W-191	<5	" "	New " "
W-192	<5	10' from " "	" " "
W-193	<5	60"-72" Wall	From the excavation
W-194	<5	" "	" " "
W-195	127	" "	" " "
W-196	6	" "	" " "
Stones	<5	Vehicle Decontamination Area	
Water	100 ppb	Portable Oil/Water Separator	

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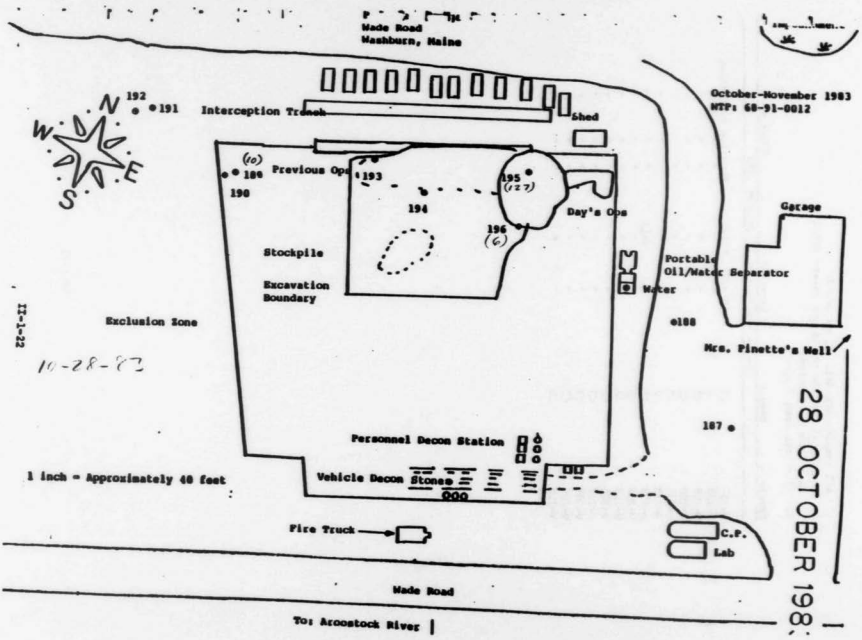
0105



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PINETTES SALVAGE YARD
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9010

1. All samples are soil unless noted.
2. Analytical results are in ppm unless noted.
3. ND = Nothing Detected.
4. <5 = Less than 5 ppm.

Sample	Result	Location	Remarks
Sample Analysis of 29 October 1983			
W-197	<5	60"-72' Floor	From the excavation
W-198	9	" "	" " "
W-199	<5	" "	" " "
W-200	<5	" "	" " "
W-201	<5	" "	" " "
W-202	<5	" "	" " "
W-203	<5	" Wall	" " "
W-204	<5	" "	" " "
W-205	72	" "	" " "
W-206	<5	" "	" " "
W-207	<5	" "	" " "
W-208	<5	" "	" " "
W-209	<5	" "	" " "
W-210	<5	" "	" " "

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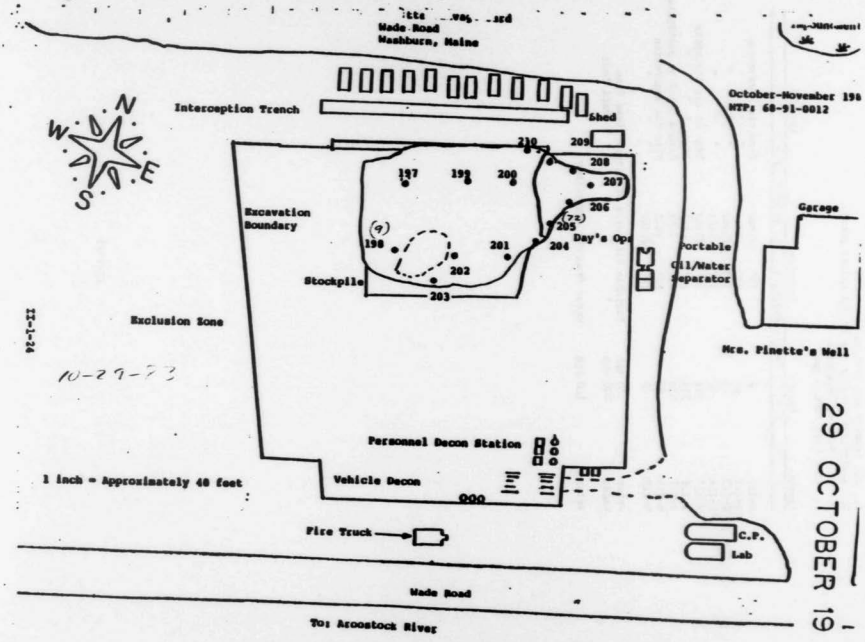

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PINETTES SALVAGE YARD
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8010

1. All samples are soil unless noted
2. Analytical results are in ppm unless noted.
3. ND = Nothing Detected.
4. <5 = Less than 5 ppm.

Sample	Result	Location		Remarks
		Sample Analysis of 31 October 1983		
W-211	8	72"	Floor	From the excavation
W-212	<5	60"	Wall	" " "
W-213	<5	72"	Floor	" " "
W-214	90	54"	Wall	" " "
W-215	331	60"	Floor	Base of the Stockpile
W-216	518	72"	Wall	Side " " "
W-217	530	+ 24"	Side	Random point on Stockpile
W-218	32	60"	Wall	From the excavation
W-219	<5	72"	Floor	" " "
Water	50 ppb	Portable Oil/Water Separator		Rear Tank
Water	700 ppb	" " "		Forward Tank
Water	110 ppb	Water from the excavation		

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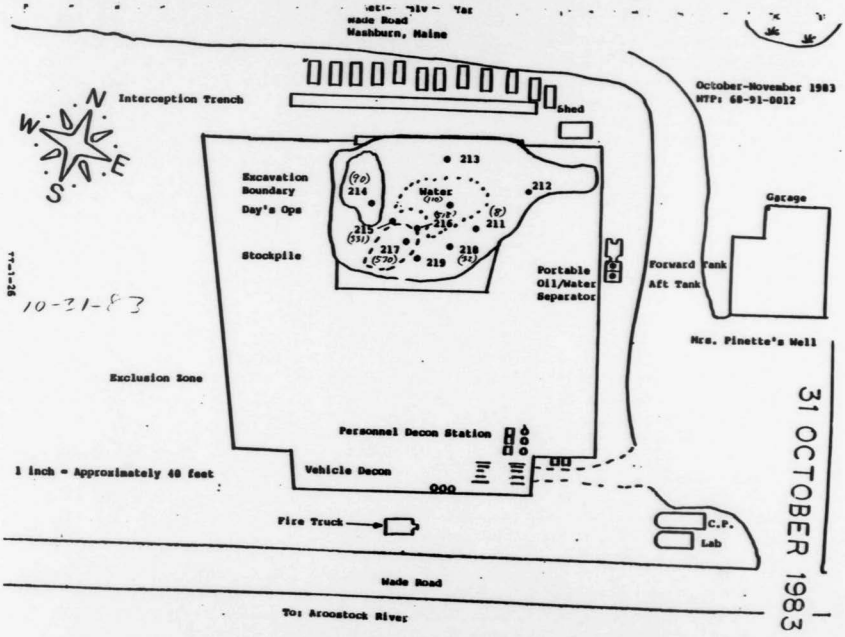

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Appendix II

Section 2

Air Monitoring Report

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: November 22, 1983

SUBJECT: Air Sampling Investigation
for PCBs at Washburn, Maine

FROM: Peter R. Kahn, Environmental Engineer PRK
Air Section, ESD

TO: Donald Berger, Environmental Engineer
Oil and Hazardous Materials Section, ESD

I. Introduction

On October 19, 1983, Air Section of the Environmental Services Division (ESD) conducted an investigation of airborne PCBs on the Pinette Salvage area, Washburn, Maine. The purpose of this investigation was to determine the effect of PCB contaminated soil in the ambient air during loading operations. The study was conducted with regard to possible harmful exposure of PCBs in the ambient air by workers and the residence of two adjacent dwellings.

II. Sampling and Analysis Methodologies

a. Sampling

Three sampling sites were chosen based on the prevailing winds for the sampling day and in conjunction with the loading and spill areas. Sites #1 and #2 were located downwind of the spill area. Site #3 was located upwind of the spill area. A full description of each site is presented in Table I with approximate locations shown on attached map. All samples had air intakes at the 2.5-3.5 foot level above the ground. Sites #1 and #2 sampled air through the use of Gast pumps at a 23 l/min rate for four hours. Site #3 used a Sierra pump to sample air at 16 l/min over a six-hour period. All sampling units were calibrated four times during the sampling period by a Kurtz Model 5 mass flowmeter. The Kurtz mass flowmeter was calibrated for field use in the 0-50 l/min (STP) range against a Collins gasometer.

Meteorological measurements of wind speed and direction were taken throughout the study area during the sampling period. A hand-held anemometer was used to take the meteorological measurements at the 5-6 foot level. These measurements can be found in Table I. The temperature during the sampling period was within the range of 35-40°F.

b. Analysis

Air samples were collected on a solid adsorbent (florisil) according to a method developed by R. Siscanaw and Dr. Spittler of U.S. EPA, Region I, ESD. In this method, air samples are collected on florisil traps at a rate of 15-23 l/min for a four- to six-hour period. Florisil is then extracted with hexane. The extract is then concentrated and analyzed on a Hewlett Packard 5880 gas chromatograph equipped with a 30m DB-5 capillary column. Quality control measures included a field blank, backup traps on the two

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downwind sites, and a spiked sample of arochlor 1260. Percent recovery of the PCB control was 90%. The field blank resulted in a non-detectable value.

III. Results and Discussion

The results of this investigation are presented in Table I. PCBs are reported as total PCBs, not specific arochlors. However, based on analysis, the majority of PCB species identified were arochlor 1260. PCB 1260 has a boiling point in the range of 385-420°C, which suggests low volatility.(1) At site #2, a total of 21 ng/m^3 was collected. At this site and at site #1, a primary florisil trap followed by a backup trap was used. The primary trap collected 12 ng/m^3, and the backup trap collected 9 ng/m^3. Site #1 collected a total of 7 ng/m^3, with 4 ng/m^3 collected on the primary trap and 3 ng/m^3 on the backup. Site #3, the upwind site, collected less than 2 ng/m^3 as would be expected given the recorded meteorological data.

The breakthrough experienced at sites #1 and #2 was approximately 75%, which is considered to be high. However, given the low levels detected, high breakthrough values may not be uncharacteristic for this method.

The levels found at the three study sites are considerably lower than the proposed NIOSH criterion for a safe workplace atmosphere of 1000 ng/m^3 over a 8-10 hour work day and a 40 hour work week.(2)

IV. Conclusions

Levels of airborne PCBs at their greatest concentration within the study area were 21 ng/m^3, considerably lower than the proposed NIOSH workplace standard for PCBs in the air. Given high breakthrough, high wind speeds, and low ambient temperatures, the levels of PCBs may exist at levels higher than those measured. However, if the true values were higher, it is anticipated that they would not be significantly above those detected in this study.

It is important to point out that the results of this study are only conducive to the meteorological conditions and source activity at the time of sampling. PCB levels could vary as a result of higher ambient temperatures and lower wind speeds and changes in PCB levels in soil or groundwater. Therefore, it is recommended that a follow-up study be conducted if significantly higher PCB levels are detected in the soil or water and removal activity recommenced during summer environmental conditions.

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TABLE I

INVESTIGATIVE RESULTS OF AIRBORNE PCBs
AT PINETTE SALVAGE, WASHBURN, MAINE
SAMPLED OCTOBER 19, 1983

Site No.	Site Description	PCBs* (ng/m^3)		Meteorology	
		Primary	Backup	Wind Speed (Knots)	Wind Direction (degrees)
1	15-20 feet downwind of spill area within hot zone	4	3	6 ± 36%**	360 ± 3%
2	70-80 feet downwind of spill area outside hot zone	12	9	6 ± 36%**	360 ± 3%
3	40-50 feet upwind of spill area	ND†		3 ± 40%	351 ± 7%

*Excludes percent recovery.

**Meteorological measurements were the same due to their close proximity to one another.

†ND = less than 2 ng/m^3.

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Endnotes

(1)Hutzinger, O., S. Safe, and V. Zitko, "The Chemistry of PCB's", CRC Press, Cleveland, Ohio, 1974.

(2)MacLeod, K. and R. Lewis, "Abstracts of Papers", 181st National Meeting of the American Chemical Society, Atlanta, GA, April 1981, American Chemical Society: Washington, D.C. 1981: PEST 32.

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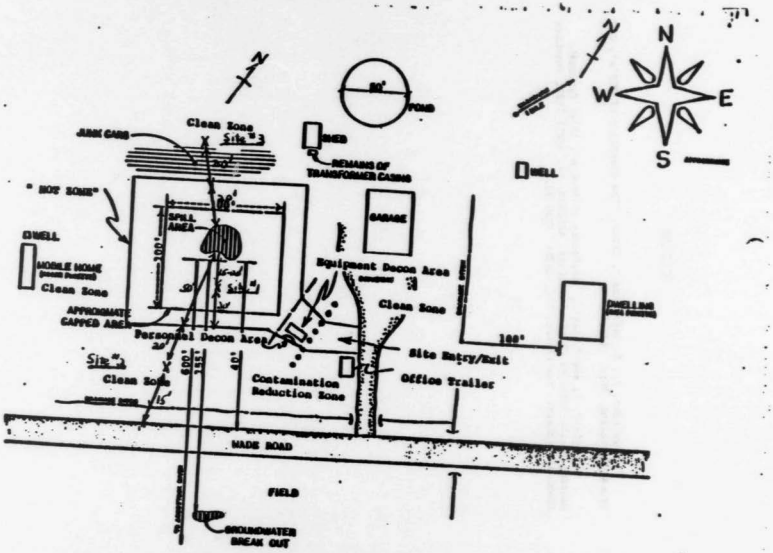

WASHBURN SITE SKETCH Sampled October 19, 1983

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APPENDIX II

Section 3

Testpit Excavation Logs

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PINETTES SALVAGE YARD
ADMINISTRATIVE RECORD

PIS 002

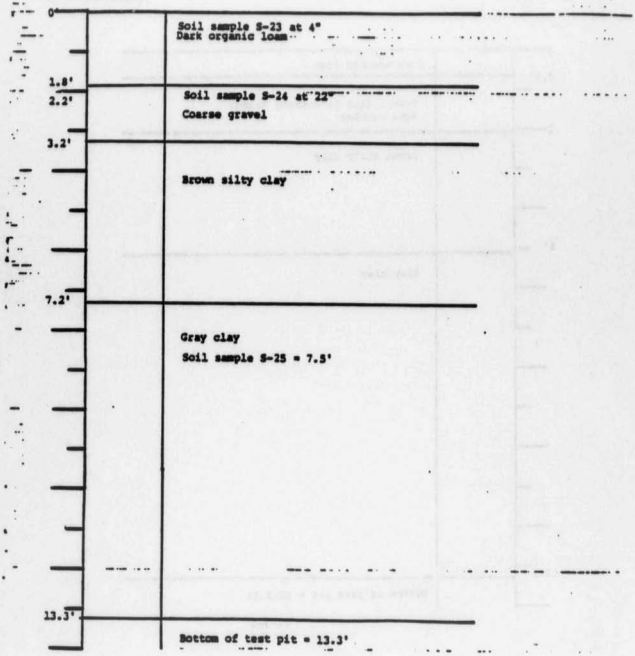
0 1 18

Pinette Salvage Yard
Washburn, Maine
NTP: 68-91-0012

Test Pit # S-21
19 October 1983

No Water noted

1' = 0.5 inches



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PINETTES SALVAGE YARD
ADMINISTRATIVE RECORD

PIS 002

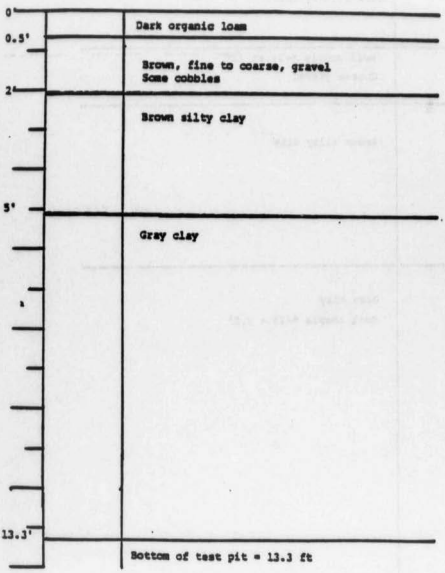
0119

Pinette Salvage Yard
Washburn, Maine
NTP: 68-91-0012

Test Pit #1
20 October 1983

Depth to Water: 2.5 ft

1' = 0.5 inches



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PINETTES SALVAGE YARD
ADMINISTRATIVE RECORD

PIS 002

0120

Pinette Salvage Yard
Washburn, Maine
NTP: 68-91-0012

Test Pit #2
20 October 1983

Depth to Water: 3.6 ft

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PINETTES SALVAGE YARD
ADMINISTRATIVE RECORD

PIS 002

0121

Pinette Salvage Yard
Washburn, Maine
NTP: 68-91-0012

Test Pit #3
21 October 1983

Depth to Water: 4.5ft.

1' = 0.5 inches

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PINETTES SALVAGE YARD
ADMINISTRATIVE RECORD

PIS 002

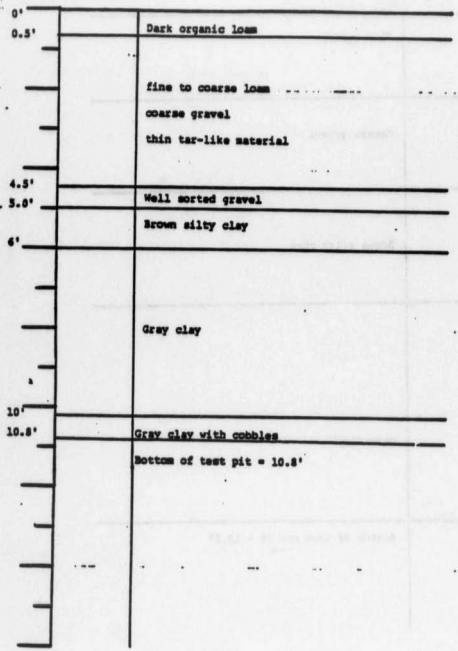
0122

Pinette Salvage Yard
Washburn, Maine
NTP: 68-91-0012

Test Pit #4
21 October 1983

Depth to Water: 4.5'

1' = 0.5 inches



Pinette Salvage Yard
Washburn, Maine
NTP: 68-91-0012

Test Pit #5
22 October 1983

Depth to water: 4.0'

1' = 0.5 inches

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PINETTES SALVAGE YARD
ADMINISTRATIVE RECORD

PIS 002

0123

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Date: 28 February 1984

Subject: Final Observations at the Pinette Site
NTP 68-91-0012

From: David W. Tordoff
O & M Section

To: Elliott Thomas
Waste Management Division

1. The analytical log and graphic depiction of samples has not been received from the TAT member, due to his work on two priority projects.

2. However, some of the final samples, may assist you.

Sample	Value	Location	Depth (Approx.)
211	8 ppm	Right front, floor	6'
212	<5 ppm	Right rear, side	5'
213	<5 ppm	Center rear, floor	6'
214 *	90 ppm	Left side, wall	4.5'
215 *	331 ppm	Left side, floor	5'
216 *	518 ppm	Left center, base of pile	6'
218	32 ppm	Center Front, side	5'
219	<5 ppm	Left front, floor	6'

< = Less than
See enclosed diagram

3. Please note that the three asterisked samples were taken from points at the base of the stockpile of material that had been amassed for disposal. These areas were removed as part of the stockpile.

4. Based on my visual observations of the soil and water in the excavation, I would estimate that any remaining contaminated soil would lie at a depth of 5 to 7 feet and, as the analysis indicates, is probably under 50 ppm.

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PINETTES SALVAGE YARD
ADMINISTRATIVE RECORD

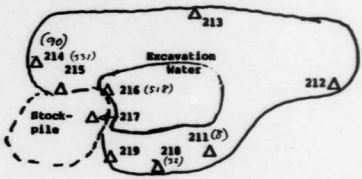
PIS 002

0124

Pinette Salvage Yard
Wade Road
Washburn, Maine

October-November 1983
NTP: 68-91-0012

Groundwater Interception Trench



Depicting the Samples of
31 October 1983

Wade Road

Attachment 12
Page

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PINETTES SALVAGE YARD
ADMINISTRATIVE RECORD

PIS 002

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