

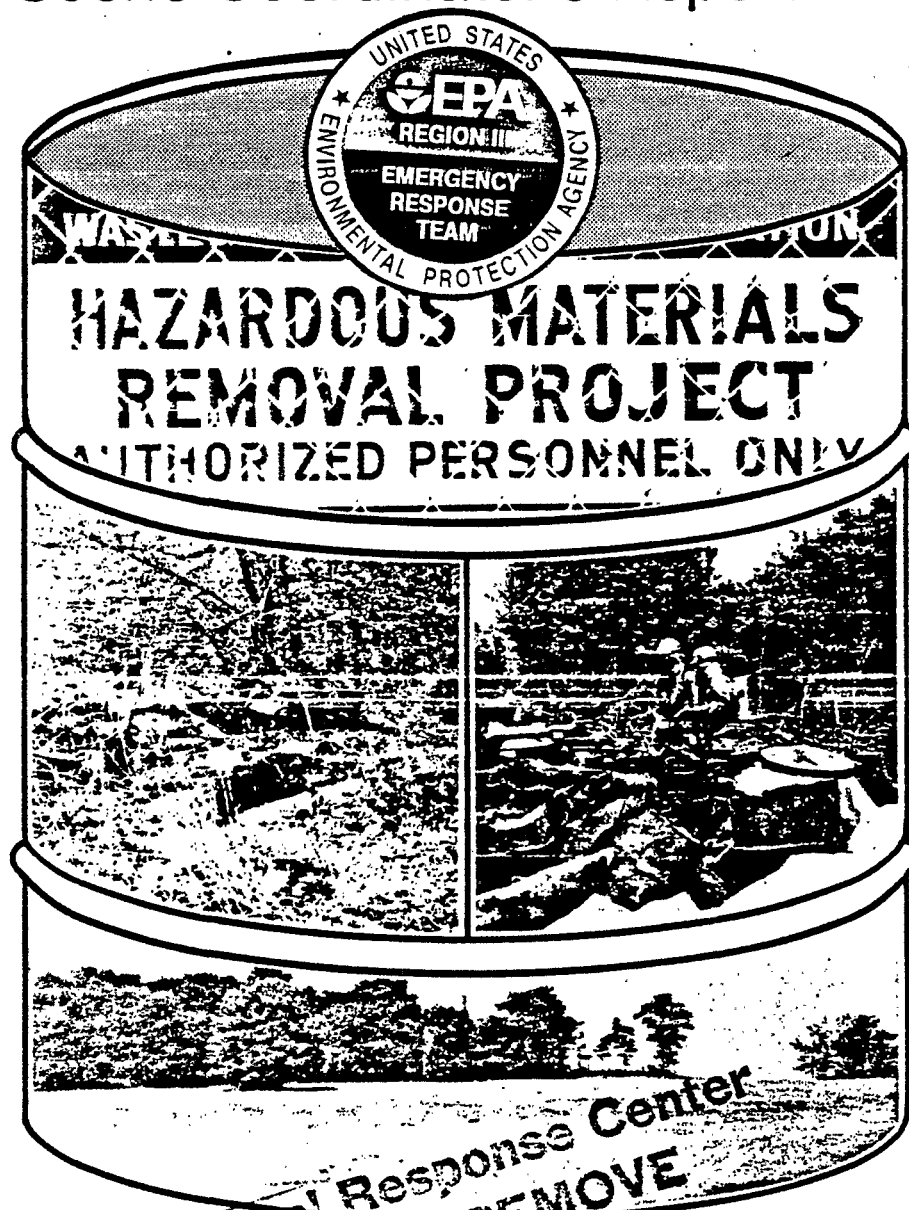
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**CERCLA - EPA Region III
Immediate Removal Project
Kane and Lombard Streets Drum Site
Baltimore, Maryland
On-Scene Coordinator's Report**



Regional Response Center
DO NOT REMOVE

AR400243

SITE NUMBER 52 SITE NAME KANE & LOMBARD

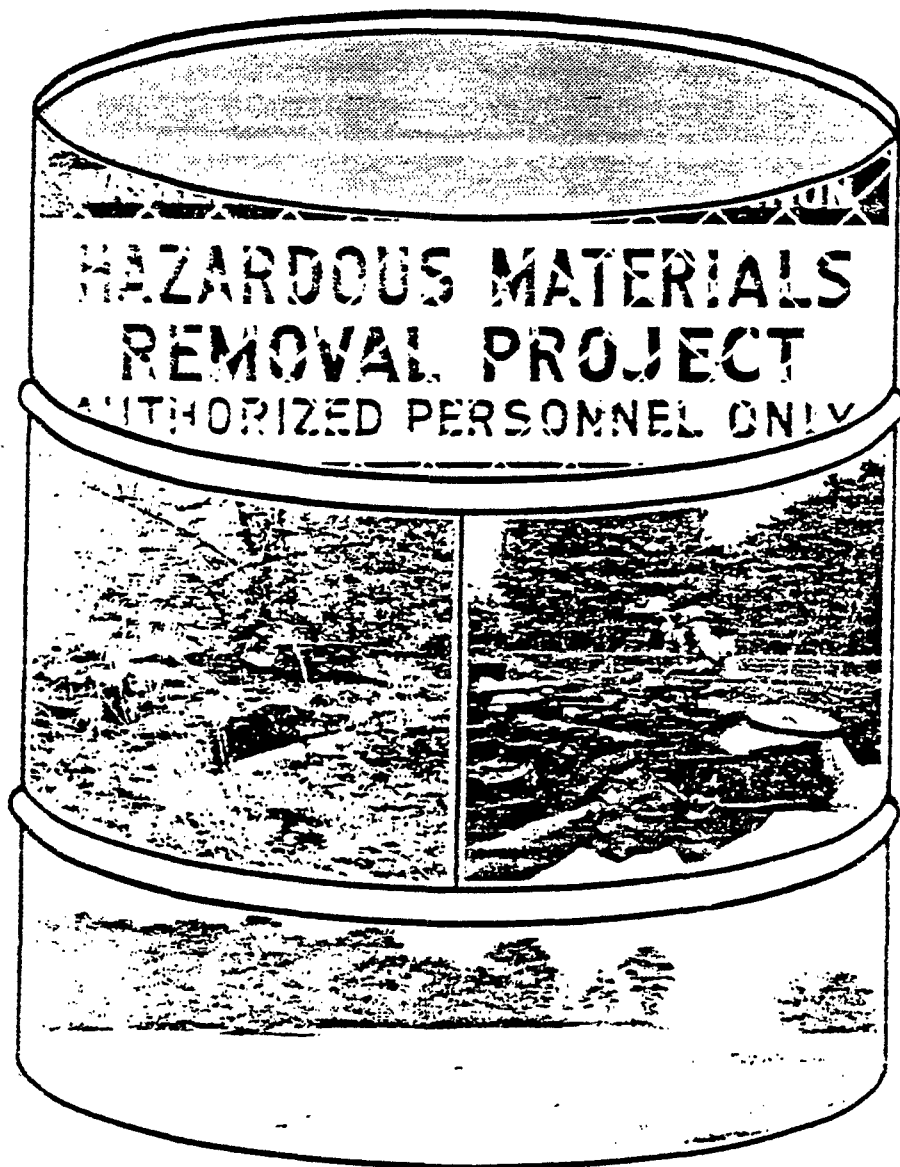
Regional Response Team Standing Members indicated with a check mark and date have received a copy of this On-Scene Coordinators Report.

R.R.T. Member	REPRESENTING	DATE	
Donald Footer	U.S. D.O.A.		
Harold Stanford	U.S. D.O.C.		
John Barker	U.S. D.O.E.		
Frank Piecuch	U.S. D.O.H. & H.S.		
Walter Pierson	F.E.M.A.		
Anita Miller	U.S. D.O.I.		
Patricia Casano	U.S. D.O.J.		
John Barry	U.S. D.O.L.		
Capt. Pete Lauridsen	U.S.C.G. - 5th Dist.	4/11/86	✓
Ron Nelson	MD. D.O.H. & M.H.		
Dwight Worley	PA. D.E.R.		
Norman McTague	VA. S.E.S.		
William Razor	DE. D.O.P.S.		
Timothy Laraway	W.VA. D.O.N.R.		
Dr. Michael Heeb	U.S. D.O.D.		
William Ruby	D.C. C. & R.A.O.		
Hans Crumb	N.R.T.		
Regional Response Center	U.S. E.P.A. Region III		✓
Back-up File			

AR400244



**CERCLA - EPA Region III
Immediate Removal Project
Kane and Lombard Streets Drum Site
Baltimore, Maryland
On-Scene Coordinator's Report**



AR400245

FACTS SHEET

AR400246

Kane and Lombard Streets Drum Site
Baltimore, Maryland

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AR400247

REGION III
CERCLA EMERGENCY RESPONSE/IMMEDIATE REMOVAL ACTION

FACTS SHEET

SITE: Kane and Lombard

SIZE: 8.3 acres

LOCATION: Baltimore, Maryland

APPROVAL DATE: May 3, 1984

PROJECT DATES: May 7, 1984 through June 8, 1984

DESCRIPTION: Previously operated as an unpermitted dump, the 8-acre site was adjacent to a high school and the Baltimore City Hospital. The preliminary assessment indicated a fire and explosion hazard, and a direct contact threat posed by the presence of approximately 1000 surface drums. Upon unsuccessful efforts by the State of Maryland to initiate cleanup action from the property owner, the State requested EPA assistance.

HAZARDOUS MATERIAL: Paint and plastics wastes, volatile organics and heavy metals.

QUANTITIES REMOVED: 1163 drums (342 drums were full)

OSC: Robert E. Caron

REMOVAL CONTRACTOR: O.H. Materials, Inc.

DISPOSAL LOCATIONS: Fondessy Enterprises, Oregon, OH RCRA #OHD045243706
SCA, Model City, NY RCRA# NYD0498366769

PROJECT CEILING: \$710,000

PROJECT COST: \$578,703 (estimated)

COMMENTS: This drum removal project was completed in a timely manner with significant cost savings. The site was fenced and covered, and referred for Remedial consideration.

AR400248

FOREWORD

AR400249

Kane and Lombard Streets Drum Site
Baltimore, Maryland

FOREWORD

This report is submitted in accordance with the procedures outlined in the National Oil and Hazardous Materials Contingency Plan (NCP), Section 300.56, which requires the On-Scene Coordinator (OSC) to submit a written report within 60 days of the date when the threat is controlled. The primary thrust of the Plan is to provide a coordinated Federal response capability at the scene of an unplanned or sudden discharge of oil or a hazardous substance that poses an imminent threat to the public health or welfare. The provisions of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) promotes a coordinated Federal, State and local response to mitigate situations at hazardous waste sites which pose an imminent hazard to public health or the environment. The Kane and Lombard Streets Drum Site in Baltimore, Maryland, presented an imminent and substantial threat to the environment, thus providing a legal basis for Federal response activities. The provisions of the NCP were implemented by the U.S. Environmental Protection Agency (EPA), Region III, Philadelphia, Pennsylvania.

Special thanks are extended to all agencies and individuals who supported this CERCLA removal action. The efforts of all personnel were often beyond the call of duty, working long hours on a continuous basis.

The State of Maryland, under the direction of Ron Nelson, and Baltimore City personnel added immeasurably to the overall success of this project.

The U.S. Coast Guard/Atlantic Strike Team (USCG/AST), under the leadership of Lt. Glenn, participated extensively in this removal.

Robert E. Caron
On-Scene Coordinator
U.S. EPA, Region III
Philadelphia, PA

AR400250

SECTION I
INTRODUCTION

AR400251

Kane and Lombard Streets Drum Site
Baltimore, Maryland

INTRODUCTION

A. Nature of the Site/Initial Situation

The Kane & Lombard Streets Drum Site is an old abandoned 8.3 acre dump with rusted, bulging, damaged and decaying 55-gallon drums chaotically strewn at several locations on the site.

Pursuant to State request the OSC made a windshield inspection of the site on 4/25/84, followed by a site assessment on 5/1/84. The following observations were recorded:

- Approximately 1,000 surface drums in various stages of structural disintegration were present on site and approximately half of them contained material.
- Several drums, opened during the site assessment, yielded air readings on the HNU photo-ionizer and/or organic vapor analyzer inside the drum in excess of 2,000 ppm, and 70% LEL readings on the explosimeter.
- A recent fire on site (February 22, 1984), reportedly caused by vandalism, involved those drums. The responding firefighters reported several explosions.
- School students were sighted on site smoking.
- Breaches in school fence leading to the site at several locations and evident pathways on the site.
- Previous State sampling indicated the presence of volatile organics (toluene, xylene,) heavy metal (chromium) and other chlorinated organics on site.

AR400252

Kane and Lombard Streets Drum Site
Baltimore, Maryland
INTRODUCTION (continued)

A. Nature of the Site/Initial Situation (cont'd)

During the site assessment, 4 drum samples were collected and split samples were offered to an accompanying attorney representing the responsible party. The analyses indicated high concentrations of volatile organics in the samples. In addition, the ignitability tests indicated flash points less than 60°C (140°F) in one of the four drums. The low flash point and high volatile organic concentrations depicted a fire/explosion threat from the site.

The site visit on May 1, 1984 also revealed the presence of serious erosion problems on the east end of the site where erosion over time had exposed several drums. The west side of the property indicated a "lift", akin to the lift of a landfill, rising upwards about ten feet.

A Baltimore City Health representative indicated that the dump was operational about 5 to 10 years ago where "any type of waste" was dumped. In addition, he indicated that several fires had occurred at the site and on one occasion a child was injured when he fell through the surface soils and suffered burns from an underground fire.

No structures were present on site. The site could be considered "undeveloped". The absence of adequate cover or capping or vegetation was evident.

The State had been attempting to use State enforcement authority to initiate cleanup actions at the site through the property owner. However, the enforcement efforts by the State were unsuccessful in eliciting appropriate action from the responsible party.

AR400253

Kane and Lombard Streets Drum Site
Baltimore, Maryland
INTRODUCTION (continued)

A. Nature of the Site/Initial Situation (cont'd)

Therefore, based upon the above information and health/environmental threat evaluations by the Centers for Disease Control and the Environmental Response Team concurrence, it was determined that the site presented an imminent and substantial danger to the public health via the fire/explosion and direct contact threats. An Action Memorandum was prepared (see Appendix B) requesting funds for cleanup at the site and was submitted to the Regional Administrator on May 2, 1984. On May 3, 1984 the OSC received funding approval from the Regional Administrator for \$710,000 in extramural and intramural monies.

B. Site Location

The site is located in Baltimore, Maryland, in the Orangeville subdivision southwest of the intersection of Kane & Lombard Streets. The site is adjacent to the Patterson High School on the southern boundary and baseball fields on the eastern boundary. In addition, the site is within 1/4 mile from residential and commercial areas. Therefore, the site location can be considered highly sensitive. A map of the area and a site sketch can be found in Appendix A.

C. Efforts to Obtain Response by Responsible Parties

In August of 1983, the State of Maryland (Director, Waste Management Administration) issued a Complaint and Order (see Appendix C) to the present property owner to clean up the site by September 30, 1983. The owner appealed this order. The State has been unsuccessful in forcing compliance, prompting their request for EPA assistance.

AR400254

Kane and Lombard Streets Drum Site
Baltimore, Maryland
INTRODUCTION (continued)

C. Efforts to Obtain Response by Responsible Parties (cont'd)

EPA issued a demand letter under Section 104(e) of CERCLA to the present property owner. The owner claimed no knowledge or responsibility for the drums on his property. EPA Enforcement personnel, upon investigation, concluded that the property owner did not have the necessary funds to finance a cleanup of this magnitude. As a result, the Enforcement Branch of EPA elected not to issue an order under 106 of CERCLA to the property owner, but to initiate immediate cleanup action followed by cost recovery procedures upon completion of the project.

AR400255

SECTION II
ROSTER OF AGENCIES

AR400256

ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS, Kane & Lombard Streets, Baltimore, MD

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF WORK
U.S. EPA -- Region III Environmental Emergency Branch 6th & Walnut Streets Philadelphia, PA 19106 (215) 597-9898	Robert Caron Stephen Jarvela Kermit Rader, Regional Attorney Harold Yates	On-Scene Coordinators Assisted OSC in legal matters Public Affairs Representative
U.S. Environmental Protection Agency 401 M Street, S.W. Washington, DC 20401 (202) 382-3194	Pat Flynn	Contracting Officer
U.S. Coast Guard Atlantic Strike Team Elizabeth City, N.C. 27909 (919) 338-1100	Lt. S. Phil Glenn CWO Jim Edmonds	Total 5 USCG/AST personnel at the site. Responsible for site safety, cost tracking and documentation.
U.S. EPA Environmental Response Team GSA Karitan Depot Edison, NJ 08817 (201) 321-6740	Robert W. Gibulskis	Technical Assistance to OSC. Air monitoring program, sampling and measuring program.
Center for Disease Control Atlanta, GA 30333 (404) 452-4100	Kent Gray Eric Sampson	Provided assistance to OSC in addressing health related concerns.
Roy F. Weston, Inc. SPER Division 5090 Central Highway, Suite #3 Pensauken, NJ 08109 (609) 663-7995	Michael Balla Jay Motwani Cesar Lee	Technical Assistance to OSC. Air monitoring program, sampling and measuring program, and site stabilization program.

ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS, Kane & Lombard Streets, Baltimore, MD

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF WORK
State of Maryland Department of Health and Mental Hygiene 201 W. Preston Str Baltimore, MD 21201 (301) 383-6650	Alex Mark Cox Frank Henderson John Myers Michael Griffin Linda Smeyne	State On-Scene Coordinator Provided assistance to OSC with air monitoring and sampling activities and logistical support. State coordinator for public relations
State of Maryland Department of Health and Mental Hygiene Division of Environmental Disease Control 201 W. Preston Street Baltimore, MD 21201 (301) 383-2759	Ellen Coe, R.N., M.P.H.	Provided assistance to OSC on health related issues in conjunction with CDC.
State of Maryland Department of Health and Mental Hygiene Waste Management Administration West Preston Street Baltimore, MD 21201 (301) 383-3123	Ron Nelson, Director	Provided lead in State coordination with OSC for site activities.
State of Maryland Department of Health and Mental Hygiene Enforcement Program 201 W. Preston Street Baltimore, MD 21201 (301) 383-6650	John W. Koontz	Provided OSC with assistance and information concerning enforcement activities.

ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS, Kane & Lombard Streets, Baltimore, MD

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF WORK
State of Maryland Air Management Administration 201 W. Preston Street Baltimore, MD 21201 (301) 383-6650	Dave Sanders	Provided on-site air analytical support to OSC.
Baltimore City Fire Department Oldtown Station 1100 Hillen Street Baltimore, MD 21202 (301) 396-5756	James D. Henry, Captain	Provided OSC with assistance in establishing an evacuation plan and firefighting support.
Baltimore City Health Department Bureau of Industrial Hygiene 111 North Calvert Street Baltimore, MD 21202 (301) 396-4428	Nancy Suska, Environmental Engr.	Provided OSC with logistical support and technical evaluations.
Baltimore County Police Department 216 N. Marllyn Avenue Baltimore, MD 21221 (301) 494-2340	Sgt. E. Griffin, W.T. Dyer	Provided OSC with security support and logistics.
Baltimore City Department of Public Works Survey and Records Division 510 Fallsway Baltimore, MD 21202 (301) 396-4557	William J. Brooks, Survey Supervisor	Provided OSC with maps and sketches of site concerning enforcement activities.

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ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS, Kane & Lombard Streets, Baltimore, MD

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF WORK
Baltimore City Department of Education 2330 St. Paul Street Baltimore, MD 21218 (301) 396-6541	F. Schonowski	Provided OSC with coordination with school officials.
Peterson High School 100 Kane Street Baltimore, MD 21224 (301) 396-9274	Hy Zolet, Athletic Director Francis Thomas, Principal	Coordinated with OSC regarding recreational activities adjacent to the site.
Baltimore City Hospitals 4940 Eastern Avenue Baltimore, MD 21204 (301) 955-0120	Ron Peterson, Director	Coordinator between site and hospital officials.
Baltimore Sun 501 Calvert Street Baltimore, MD 21202 (301) 332-6940 (301) 32-6100	George Cook Michael Burns	Press Personnel
O.H. Materials 16406 U.S. Route 224E P.O. Box 551 Findlay, OH 45839-0551 1-800-557-9340	Lloyd Ataffer	FRCS prime removal contractor
Guardian Construction 1280 Porter Road Bear, DE 19701 (302) 834-1000	Jim Buckland	Subcontractor to O.H. Materials

AR400260

ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS, Kane & Lombard Streets, Baltimore, MD

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF WORK
Martel Laboratory 1025 Cromwell Bridge Road Baltimore, MD 21204 (301) 825-7790	Robert Edwards	Provided analytical support.
Century Testing Lab 1501 Grandview Avenue Thorofare, NJ 08086 (609) 848-3939	Bob Ochs	Provided analytical support of air tubes.
NEIC Denver Federal Center Building 53, Box 25227 Denver, CO 80225 (303) 234-4661	Dr. Ted Meiggs	Provided analytical support.
U.S. EPA Central Regional Lab 839 Bestgate Road Annapolis, MD 21401 (301) 224-2740	Dan Donnelly	Coordinator for EPA and contract labs for analytical support.
WBAL, TV-11 3800 Hooper Avenue Baltimore, MD 21211 (301) 467-3000	Meredith Ruel	Press personnel.
Channel 2 News 6400 York Road Baltimore, MD 21212 (301) 377-2222	Joyce Jefferson Michael Sochet	Press Personnel
WJZ TV-13 Television Hill Baltimore, MD 21211 (301) 466-0013	Jeff Salkin	Press Personnel

ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS, Kane & Lombard Streets, Baltimore, MD

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF WORK
Century Engineering 32 West Road Towson, MD 21204 Baltimore, MD 21218 (301) 823-8070	Don Finch	Provided OSC with survey and topographic map of site.

AR400262

SECTION III
CHRONOLOGY OF EVENTS

ARL:00263

Kane and Lombard Streets Drum Site
Baltimore, Maryland
OSC Report

CHRONOLOGY OF EVENTS

August 1983 - State of Maryland issued a Complaint and Order to the present property owner, ordering him to clean up site by September 30, 1983.

March 15, 1984 - MDWMA Mark Cox contacted the OSC to request EPA assistance. State of Maryland efforts to obtain responsible party action were unsuccessful. OSC scheduled a site assessment including review of available State data on a priority basis.

April 25, 1984 - A windshield assessment by the OSC, sampling information from State files, past and recent history of fires on site involving drums and trash, and the unsecured state of the site indicated the existence of a potential emergency situation.

April 26, 1984 - The State of Maryland officially requested EPA Removal Action at this site. Draft Action Memorandum was prepared--to be submitted pending analytical results from the scheduled sampling expedition.

April 27, 1984 - Legal counsel for property owner denied EPA access for sampling on this date, but agreed to site access/sampling on May 1, contingent on the presence of the property owner's representative on site and facilitation for split samples.

April 28, 1984 thru May 3, 1984 - OSC received analytical results and submitted funding request for Regional Administrator's approval. Upon receipt of funding approval on May 3, 1984 the OSC issued a verbal notice to the property owner.

AR400264

Kane and Lombard Streets Drum Site
Baltimore, Maryland
OSC Report
CHRONOLOGY OF EVENTS (continued)

May 1, 1984 - OSC, TAT and MDWMA performed on-site assessment escorted by legal attorney representing the property owner. Six drums were opened, four of which were samples. Split samples were given to the accompanying attorney. All site activity, air readings and sample locations were logged and photographed. Explosive atmospheres were found in two of the six drums opened.

- The State commenced investigation of recent fires and possible groundwater use in the area.

May 2, 1984 - Action Memorandum was submitted for RA approval.

- Verbal, preliminary results from samples collected during the site assessment on May 1 indicated the presence of volatile organics in drums on site, one of which yielded a flash point of less than 70°F.

- Limited site security was arranged by MDWMA.

May 3, 1984 - RA approval was received for Immediate Removal Action, which was planned to be undertaken in phases; site security, fencing, measuring and sampling, surface drum overpacking, staging, sampling, transporting and disposal; and site restoration.

- The OSC issued verbal notice to property owner, activated ERT and USCG/AST.

- On-site work postponed until May 7, on request of MDWMA, in order to allow for planning of community relations.

AR400265

Kane and Lombard Streets Drum Site
Baltimore, Maryland
OSC Report
CHRONOLOGY OF EVENTS (continued)

May 4, 1984 - OSC received response to oral notice given to the property owner from the owner's legal attorney in that the property owner refused to take action, claiming that the drums were disposed on his property by a third party, without his knowledge. The property owner agreed to allow EPA access to perform an immediate removal. The State, upon request of the OSC, agreed to provide support in site activities, community relations and limited site security over the weekend. OSC contacted ERT, TAT and USCG/AST to request their presence on scene at 0800 hours, May 7, 1984. OSC also contacted ERCS project manager to request a response manager and clerk at 0800 hours, May 7, 1984 to meet with OSC and develop an appropriate written Delivery Order.

May 7, 1984 - OSC issued a delivery order to ERCS contractor. A press conference was held at 1030 hours. Personnel present included the OSC, State officials, city officials, and a Congresswoman. OSC met with school and hospital officials at 1500 hours at Patterson High School. Present were State Officials, TAT, and EPA public Affairs representative, Channel 11 Action News, and representatives of Our Lady of Fatima.

OSC conducted a meeting at 1600 hours at the MDWMA field office to develop site operations and monitoring strategies. Personnel present included the OSC, MDWMA, ERT, USCG/AST, TATs and the prime contractor.

MDWMA public affairs officials distributed door-to-door approximately 2,000 fliers to advise area residents of the public meeting at 1900 hours, at which public and press interest remained high.

A 24-hour site security was implemented, night security provided by Baltimore City Fire Prevention Bureau.

AR400266

Kane and Lombard Streets
 Drum Site
 Baltimore, MD
 RESOURCES COMMITTED (continued)

C. Extramural Chronological Expenditure Log (Estimated) (continued)
 1. O.H. Materials (ERCS Contractor) (continued)

<u>Date</u>	<u>Cost to Date</u>	<u>Ceiling</u>
5/17/84	\$135,659.03	
5/18/84	150,804.18	
5/19/84	167,488.94	
5/20/84	173,879.69	
5/21/84	186,838.60	
5/22/84	199,629.50	
5/23/84	212,150.48	
5/24/84	227,355.02	
5/25/84	242,847.62	
5/26/84	257,591.85	
5/27/84	266,660.84	
5/28/84	270,019.35	
5/29/84	282,084.97	
5/30/84	293,882.97	
5/31/84	322,375.59	\$500,000
6/1/84	348,841.48	
6/2/84	377,995.83	
6/3/84	400,516.59	
6/4/84	467,200.58	
6/5/84	479,951.05	
6/6/84	484,803.03	
6/7/84	488,811.73	
6/8/84	499,432.63	
6/9/84	499,789.13	

2. State of Maryland

<u>Date</u>	<u>Cost to Date</u>	<u>Ceiling</u>
5/8/84	\$ 1,104.56	\$50,000
5/9/84	1,665.73	
5/10/84	4,060.69	
5/11/84	5,107.08	
5/12/84	7,057.29	
5/13/84	7,583.08	
5/14/84	9,010.88	
5/15/84	9,496.61	
5/16/84	10,310.90	
5/17/84	11,984.28	
5/18/84	13,396.02	
5/19/84	14,831.43	

AR400267

Kane and Lombard Streets Drum Site
Baltimore, Maryland
OSC Report
CHRONOLOGY OF EVENTS (continued)

May 8, 1984 - Support area was regraded, command post installed complete with utilities. During regrading a storage tank of approximately 550 gallons was revealed. TAT and USCG made site entry to make an assessment; no release was evident.

Six soil samples were obtained from baseball field immediately adjacent to the site. OSC met with Baltimore City Department of Parks & Recreation and discussed potential limited access to baseball fields adjacent to the site.

ERT/TAT prepared an extensive air monitoring program consisting of continuous real-time perimeter air monitoring at established stations and regular air monitoring on and off-site using personnel pumps with appropriate sampling media.

Initial preparation for installation of the security fence, including delivery of materials, was completed.

May 9, 1984 - OSC conducted a guided site tour for the Baltimore Police, USCG, State Officials, Baltimore City Parks & Recreation, Representatives of Congresswoman Barbara Mikulski, news media, and concerned citizens.

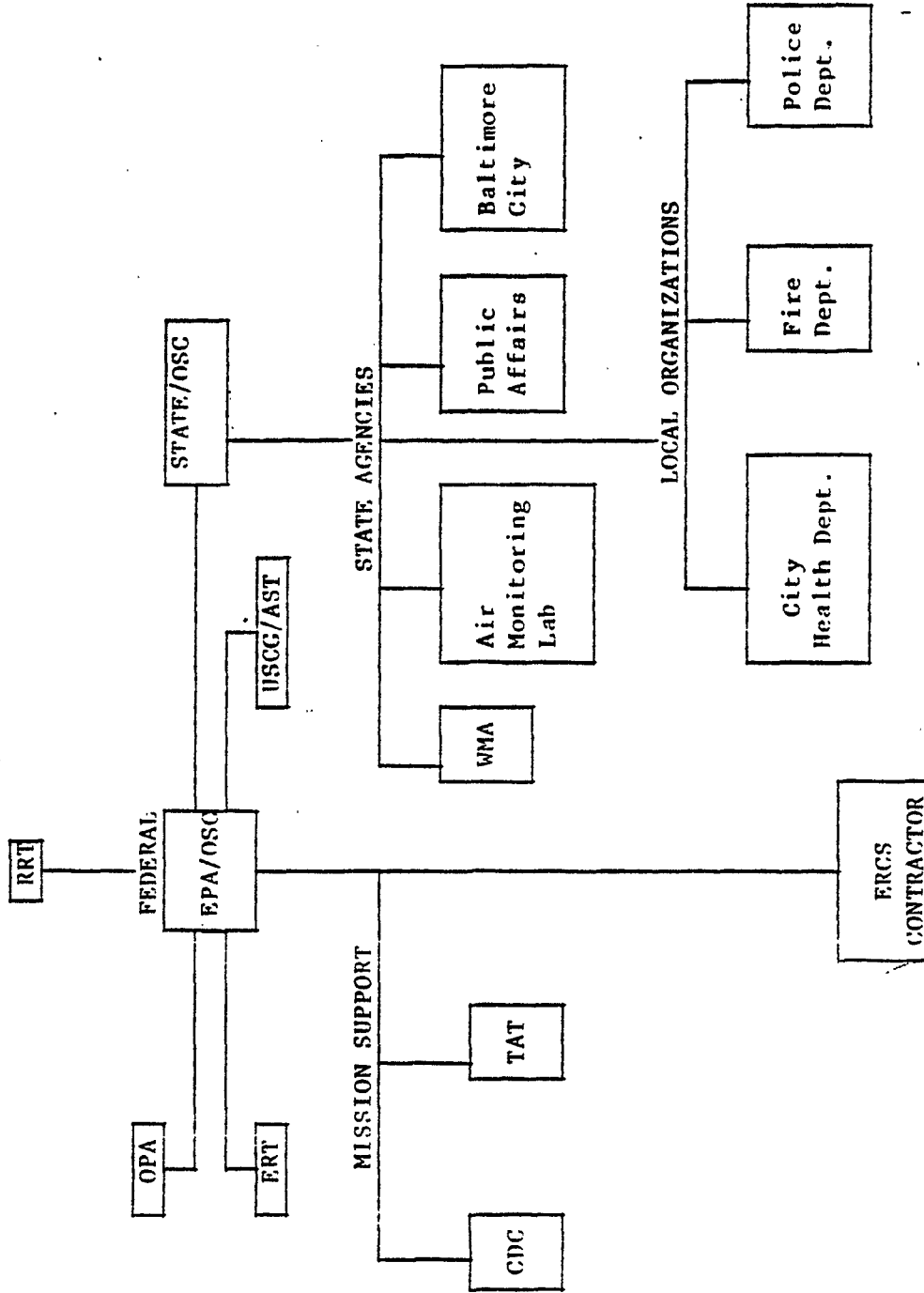
The decontamination zone and exclusion zones were established. CDC met with Dr. Susan Guainiere, Commissioner of Health, Baltimore Health Department, to discuss public health concerns and other health related issues. The site safety plan was reviewed with all on-site personnel.

May 10, 1984 - OSC deemed it safe for activities to continue on adjacent baseball field based on analytical results on soil samples collected May 8, 1984.

City of Baltimore elected not to enter into a contract with EPA to provide security on scene, therefore ERCS provided site security.

AR400268

Figure 1
 Organization of the Response
 Kane & Lombard Streets Drum Site
 Baltimore, Maryland



AR400269

Kane and Lombard Streets Drum Site
Baltimore, Maryland
OSC Report
CHRONOLOGY OF EVENTS (continued)

May 10, 1984 - ERCS initiated site work to prepare staging areas for drums, including empty and crushed drums. A local press official attempted unauthorized access to the site; site safety officer advised of this situation and appropriate action was taken.

May 11, 1984 - USCG/AST and TAT manpower was reduced due to extensive regional activity. OSC concerned over lack of available resources to properly document and monitor site operations.

Construction of staging area was completed. Three cells were prepared and drum removal commenced.

May 12, 1984 - Due to lack of TAT manpower, OSC delegated the perimeter air monitoring program to the State with TAT providing technical support.

TAT developed a Measuring and Sampling Plan to identify and delineate soil contamination on the site.

Due to poorly drained soils, operational problems with heavy equipment were encountered on several occasions. Access roads were stabilized with felled trees and covered with portable construction matting (at an estimated cost of \$3,400).

May 13, 1984 - Approximately 360 drums were removed, three of which contained liquids and were therefore overpacked, 100 of which contained solids, and the rest empty. On and off-site air monitoring was performed during the removal.

AR400270

Kane and Lombard Streets Drum Site
Baltimore, Maryland
OSC Report
CHRONOLOGY OF EVENTS (continued)

May 14, 1984 - 288 drums were removed and staged in appropriate containment cells; 656 total drums removed and staged to date.

Operational problems encountered with the grappler and the State air lab generator.

State OSC and other State personnel attended community meeting; discussion centered around the Kane & Lombard site and other local areas believed to have similar environmental/health concerns.

Federal and State OSC and USCG/SSO met with the Superintendent of Schools and faculty of Patterson High School, stressing potential risks associated with unauthorized site entries by students and requested cooperation in observing restricted boundaries.

May 15, 1984 - Fence installation was completed, with an emergency exit along the fence line for personnel. 103 drums were removed and staged, 3 of these drums contained liquids and were overpacked; the remaining drums contained solids.

TATs amended site safety plan to include protocol for heat stress situations.

May 16, 1984 - Local citizen visited the site and provided the OSC with a photograph of the site from the year 1968 showing open burning on a portion of the site. The citizen reported that the site was a dump in 1951 when he had moved into the area. State officials retained the photograph.

323 drums removed and staged, 3 contained liquids and were overpacked, 4 contained solids, and the rest were empty.

Video and photographic documentation on the site remained at a minimum due to shortage of support personnel.

AR4:00271

Kane and Lombard Streets Drum Site
Baltimore, Maryland
OSC Report
CHRONOLOGY OF EVENTS (continued)

May 17, 1984 - On-site sampling of soils and water as per the Sampling and Measuring Plan was completed by the TATs.

51 drums were removed, 5 contained solids, the remainder were empty.

May 19, 1984 - A concrete pad for equipment/vehicle decontamination was completed. During removal of a surface drum near the decontamination area an air release was recorded and 8 buried drums were exposed. These drums were immediately removed along with the contaminated soil.

*↑ only non drum
removal activity*

May 21, 1984 - Property owner, Mr. Azrael, was on site for a briefing referred to EPA legal counsel, Kermit Rader. TAT/ERCS prepared a cost estimate of \$480,000 in extramural funds for further site work. OSC requested a modification of the ERCS delivery order to adjust the cost to \$525,000.

May 22, 1984 - Several EPA officials arrived on-scene and were briefed about site operations.

Temperatures in excess of 90°F created potential heat stress conditions and uncomfortable working conditions in level B/level C protection, therefore, work was terminated at 1600 hours.

OSC and State representatives met with community leaders from the Bayview Association to advise them about the status of site and health related concerns.

ERCS contractor commenced "grubbing" of the site to further detect the presence of any surface drums in overgrown areas. When grubbing operations were conducted adjacent to the support area, it was evacuated as a precautionary measure.

AR400272

Kane and Lombard Streets Drum Site
Baltimore, Maryland
OSC Report
CHRONOLOGY OF EVENTS (continued)

May 23, 1984 - Verbal approval from the contracts officer was received to increase the ERCS contract ceiling to \$500,000. The ceiling for TAT and USCG (mission support) was increased to \$50,000. Site work for a topographical survey of the site was completed.

May 24, 1984 - Drum shredding operations commenced but, equipment failures resulted in downtime. Official notification regarding the ceiling increase of the ERCS delivery order to \$500,000 was received.

May 25, 1984 - Verbal notification of analytical results of sampling revealed various levels of organics in the drums; soil samples appeared to be relatively free of organic contaminants. Although total metal concentrations appeared to be high, E.P. toxicity test levels did not exceed the prescribed maximum contaminant concentration levels for hazardous wastes. Rough grading of the site was initiated to prepare for final site stabilization.

May 28, 1984 - Total number drums removed: 1163; 48 flammable, 294 nonflammable, 821 empty.

A surveyor, hired under TAT Special Projects was on scene to provide necessary information for the site stabilization plan. ERCS completed overpacking and solidification of flammable liquids and solids. OSC provided a briefing and site tour to Baltimore City Health Officials.

May 29, 1984 - Heavy rains hampered site stabilization activities; topsoil cover could not be installed and minor soil runoff problems were created. The damage was minimized by using a surface runoff control system using straw bales.

TAT completed and submitted the site stabilization plan, which included topsoil cover, grading of the site to 2-3% slopes, rip rap application to steep slopes, construction of clay berms and runoff trenches as necessary, installation of sediment control structures at the outflow and hydroseeding. The plan was submitted to the State Soil Conservation Service for comment and review.

AR400273

Kane and Lombard Streets Drum Site
Baltimore, Maryland
OSC Report
CHRONOLOGY OF EVENTS (continued)

May 30, 1984 - Drum shredding and overpacking operations completed.- Site restoration activities were abandoned due to heavy rains.

May 31, 1984 - OSC, State officials and City Health Officials attended a community meeting. Upon arrival the officials encountered concerned citizens who presented a list of concerns centered mainly around health concerns and lack of public information.

106 trucks delivered an approximate volume of 1,455 cubic yards of topsoil for site cover.

June 1, 1984 - TAT compiled all up-to-date sampling results and forwarded to CDC for review and evaluation. CDC to address potential for off-site migration of on-site contaminants. The shredder demobilized. ERCS contractor continued to grade the delivered topsoil as site cover. 172 trucks delivered today. Also, as part of site stabilization plan, installing surface water drainage control structures.

OSC reviewing list of concerns presented by citizens on May 31, 1984 with ERT, CDC, State and local health officials. June 26, 1984. Final public meeting scheduled for June 26, 1984 where their concerns will be addressed. Approval for disposal of wastes received this date.

June 2, 1984 - 176 truckloads of topsoil delivered today. Installation of drainage control system in progress.

June 3, 1984 - 145 truckloads of topsoil delivered today.

June 4, 1984 - At 0800 hours, 6 trucks arrived on site for transportation of shredded drums to disposal facility. ERCS prepared hazardous waste manifests. State inspected trucks for proper placarding, etc. At 1200 hours, all trucks loaded, decontaminated and departed site for Fondessy Landfill in Ohio.

AR400274

Kane and Lombard Streets Drum Site
Baltimore, Maryland
OSC Report
CHRONOLOGY OF EVENTS (continued)

June 4, 1984 - During loading operations, on/off-site air monitoring was conducted by State and TAT personnel with photoionizers. TAT also placed off-site downwind air pumps (3) equipped with 150mg carbon tubes. On-site readings peaked at 6ppm while off-site reading peaked at 3ppm. The majority of the readings were in the range of 2 to 4ppm on site and background to 1ppm above background off site.

At 1530 hours, 54 overpacked drums were shipped to disposal site. One PCB drum was left behind. OSC notified and immediately took measures to arrange for transportation/disposal of PCB drum. 180 trucks of topsoil delivered today; 779 trucks total to date. ERCS continuing to grade soil.

June 5, 1984 - CDC completed evaluation of up-to-date sample results. They stated to OSC that there was no threat of off-site migration of potential on-site contaminants. ERCS demobilized grapple from site. ERCS continuing to demobilize equipment. ERCS continuing to build ditches and berms as per site stabilization plan. 67 trucks of topsoil delivered today. Truck deliveries terminated; a total of 846 trucks delivered at an estimated cost of \$85,000. MDDNR representative on scene and indicated concurrence with the site stabilization plan.

June 6, 1984 - Results of samples taken from decontamination pad revealed 3.5ppm of toluene. OSC contacted ERT and State for advise concerning disposal of water. All concur to spray decon water on-site and monitor downwind with photo-ionizer. ERCS continued to implement site stabilization plan and demobilize.

June 7, 1984 - Installation of all drainage control structure, as per site stabilization plan complete. All on-site equipment/materials demobilized with the exception of State trailer. Personnel on-scene: 2 State, 1 TAT, 1 ERCS. ERCS in contact with Triangle Research Institute (TRI) in nearby Laurel, MD for possible transportation/disposal of PCB drum.

AR400275

Kane and Lombard Streets Drum Site
Baltimore, Maryland
OSC Report
CHRONOLOGY OF EVENTS (continued)

June 8, 1984 - MDWMA installed 2 groundwater monitoring wells off-site. Upon drilling, both were observed to be dry. Casings were installed and wells to be sampled at a later date.

Hydroseeder arrived on site and the single overpacked PCB drum removed from site by TRI. Drum to be sent to SCA in New York. MDWMA inspected trucks and monitored all off-site transportation/disposal activities.

June 9, 1984 - Hydroseeding and all on-site activities complete. MDWMA to maintain presence on site for following 14 days to assure site security.

AR400276

SECTION IV
RESOURCES COMMITTED

AR400277

Kane and Lombard Streets
Drum Site
Baltimore, MD

RESOURCES COMMITTED

A. Initial Funding Request

The Action Memorandum requesting Immedial Removal monies in Appendix B of this report details the proposed response action in V, part B. Total project ceiling was estimated to be \$710,000. This ceiling total was established based on the work to be performed: security (\$30,000), measuring and sampling analytical costs (\$70,000), drum removal, transportation and disposal (\$500,000), and restoration (\$50,000). Also included were agency costs, expected to be incurred: TAT/USCG-AST (\$25,000), ERT/IT (\$20,000) and intramural costs (\$15,000). Funding approval was received May 3, 1984.

B. Funding Increases

There was no need for funding increases at this site. This can be attributed to the efficiet manner in which project activities were conducted in order to stay within budget. Also, the estimated project ceiling, as outlined in the Action Memo (Appendix B) was a confident, realistic estimate derived from vast experience regarding drum removals.

C. Extramural Chronological Expenditure Log (Estimated)

1. O.H. Materials (ERCS Contractor)

<u>Date</u>	<u>Cost to Date</u>	<u>Ceiling</u>
5/6/84	\$ 1,598.00	\$250,000
5/7/84	2,943.00	
5/8/84	10,093.24	
5/9/84	21,827.94	
5/10/84	35,856.23	
5/11/84	47,639.74	
5/12/84	60,204.71	
5/13/84	69,715.16	
5/14/84	83,982.55	
5/15/84	94,514.30	
5/16/84	121,529.07	

AR400278

Kane and Lombard Streets
Drum Site
Baltimore, MD
RESOURCES COMMITTED (continued)

C. Extramural Chronological Expenditure Log (Estimated) (continued)
2. State of Maryland (continued)

<u>Date</u>	<u>Cost to Date</u>	<u>Ceiling</u>
5/20/84	\$16,179.42	\$50,000
5/21/84	17,666.65	
5/22/84	18,805.51	
5/23/84	20,486.40	
5/24/84	21,817.58	
5/25/84	23,249.58	
5/26/84	24,800.77	
5/27/84	25,942.57	
5/28/84	27,171.29	
5/29/84	28,036.14	
5/30/84	29,141.90	
5/31/84	30,248.14	
6/1/84	30,325.13	
6/2/84	30,399.55	
6/3/84	30,499.64	
6/4/84	30,710.80	

3. TAT/USCG-AST

<u>Date</u>	<u>Cost To Date</u>	<u>Ceiling</u>
5/6/84	\$ 1,372.79	\$25,000
5/7/84	3,233.29	
5/8/84	4,958.29	
5/9/84	6,348.29	
5/10/84	7,575.04	
5/11/84	8,784.84	
5/12/84	10,319.34	
5/13/84	11,952.84	
5/14/84	13,163.34	

AR400279

Kane and Lombard Streets
 Drum Site
 Baltimore, MD
 RESOURCES COMMITTED (continued)

C. Extramural Chronological Expenditures Log (Estimated) (continued)
3. TAT/USCG-AST (continued)

<u>Date</u>	<u>Cost to Date</u>	<u>Ceiling</u>
5/15/84	\$14,354.09	
5/16/84	15,576.99	
5/17/84	17,099.99	
5/18/84	18,522.99	
5/19/84	19,599.99	
5/20/84	20,192.99	
5/21/84	21,569.49	
5/22/84	23,673.49	
5/23/84	25,294.49	\$50,000
5/24/84	26,898.99	
5/25/84	28,269.04	
5/26/84	29,364.04	
5/27/84	29,854.04	
5/28/84	30,310.04	
5/29/84	31,128.04	
5/30/84	31,942.04	
5/31/84	32,746.04	
6/1/84	33,250.04	
6/2/84	34,040.54	
6/3/84	34,832.54	
6/4/84	35,650.04	
6/5/84	36,442.04	
6/6/84	37,229.54	
6/7/84	38,010.94	
6/8/84	38,310.94	

D. Total Project Cost Summary

<u>1. Extramural Cost</u>	<u>Cost</u>	<u>Ceiling</u>
ERCS Contractor (O.H. Materials)	\$499,782.13	\$500,000
TAT/USCG-AST	38,310.84	50,000
State	30,710.80	50,000
EXTRAMURAL SUBTOTAL	\$568,803.77	\$600,000
<u>2. Intramural Cost</u>		
Government Expenditures (EPA)	\$ 9,900.00	\$ 15,000
INTRAMURAL SUBTOTAL	\$ 9,900.00	\$ 15,000
<u>TOTAL PROJECT COST</u>	\$578,703.77	\$615,000

AR400280

SECTION V
EFFECTIVENESS OF REMOVAL

AR400281

Kane and Lombard Streets
Drum Site
Baltimore, Maryland

EFFECTIVENESS OF REMOVAL

A. Activities of the Various Agencies

1. Responsible Parties.

As discussed in Section I (c) of this report, the State of Maryland, in August 1983, issued a Complaint and Order (Appendix B) to property owner. The State's efforts were unsuccessful, prompting request for EPA assistance.

EPA enforcement personnel concluded that the property owner did not have the necessary funds to finance a cleanup of this magnitude. Therefore, EPA Enforcement Branch did not issue a 106 Order at that time. Instead, it was decided that cost recovery action would be pursued at project conclusion.

2. State and Local Agencies.

Several State and local agencies participated in this removal project. The high level of interest and activity at this removal was both necessary and productive. The OSC would like to commend all these agencies for the extra effort provided during this removal project.

As stated in Section II of this report, the State's main responsibilities included: a) On-site real-time air monitoring support along with a photo-ionizer and an on-site air lab capable of analytical work on tenax tubes and head space; b) community relations; c) technical evaluations.

AR400282

Kane and Lombard Streets
Drum Site
Baltimore, Maryland
EFFECTIVENESS OF REMOVAL (continued)

A. Activities of the Various Agencies

3. Federal/Special Forces

Robert E. Caron was the Federal On-Scene Coordinator (OSC) for this removal project. He was responsible for the overall coordination and success of this removal project. Due to other workload commitments, the OSC's duties were shared with Stephen Jarvela

Personnel from the EPA/ERD (Pat Flynn) handled the cost control function for the OSC. Therefore, all daily reports and periodic invoices were submitted on a timely basis. There was very good communication between on-site personnel and ERD.

Due to the heavy local media interest, the Office of Public Affairs assigned Hal Yates to coordinate public concerns.

The OSC mobilized the United States Coast Guard/Atlantic Strike Team for this removal project. They fulfilled the function of site safety officer. Also, they performed cost tracking and documentation at this site. Due to the extreme heat encountered at the site, the USCG/AST coordinated in obtaining an EMT for on site medical monitoring. CDC personnel were on scene to assist OSC in addressing health related issues and provided coordination between EPA and Baltimore hospital officials.

EPA/ERT (Bob Cibulskis) provided OSC with technical assistance. Specifically, ERT provided input in the development of an air monitoring plan and measuring and sampling plan.

EPA-EPIC (Dick Parks), in an effort to determine site history, provided OSC with historic photographs of the site and the surrounding area. In spite of the heavy workload EPIC provided the OSC with expedient services.

AR400283

Kane and Lombard Streets
Drum Site
Baltimore, Maryland
EFFECTIVENESS OF REMOVAL

A. Activities of the Various Agencies

4. Contractors

Personnel from Roy F. WESTON, Inc., SPER Division, Region III were dispatched under TDD# 8405-02 to provide technical assistance to the OSC. Weston's activities were coordinated through site leader Michael Balla. These duties included; air monitoring, measuring and sampling, POLREPs, and site stabilization plans, and photographic and video documentation.

The prime removal contractor was the ERCS contractor (O.H. Materials) in Findlay, Ohio. The contractor was responsible for drum removal, transportation and disposal. Also, OHM performed compatibility studies utilizing their mobile lab which provided quick and economical turnaround. ERCS supplied the OSC with several cost savings options which were utilized by the OSC for reducing project costs (e.g. shredder, mobile lab (see Appendix II)).

B. Disposal Methods and Quantities Removed

In November, 1980 an inspector from the State of Maryland reported the presence of 400-500 drums on site. A preliminary assessment on May 1, 1984 by OSC, State and TAT identified presence of approximately 1000 drums on site.

At the conclusion of removal operations, 1163 total drums were removed. Of these 821 were classified as RCRA empties, 290 were non-flammable and 52 were identified as flammable.

Many of the on-site drums were expected to be "empty" as classified by RCRA. Of the 1,163 drums, approximately 75% were expected to contain less than 2 inches of material. The large number of RCRA empties could contain a large enough cumulative amount of wastes to potentially cause substantial soil contamination in the staging area. To prevent this the OSC directed the ERCS contractor to shred the empty drums. In addition, to prevent any extensive soil contamination from spillage in the staging area, the OSC directed the contractor to construct clay-lined cells with berms and lay visqueen in the cells.

AR 00284

Kane and Lombard Streets
Drum Site
Baltimore, Maryland
EFFECTIVENESS OF REMOVAL

A. Activities of the Various Agencies

4. Contractors

ERCS on-site mobile lab performed compatibility tests on the 346 drums not classified as RCRA empties. The results proved that all were compatible for bulking. There were no reactions observed during solidification testing of the liquids. The testing procedures and results are detailed in Volume II (section C).

The OSC decided to shred drums containing solids and drums classified as RCRA empties (1108), rather than use the alternative of crushing and disposal. Shredding proved to be a much more cost effective option as outlined in the appendix. The shredded material was disposed of at Fondessy Landfill in Ohio. Approximately 120 yds. of shredded material (6 trucks) were transported off site.

The overpacked drums (55) were transported off site to Fondessy Landfill. One truck was scheduled for transportation of these drums. Only 54 drums could be loaded for transportation. The remaining drum, containing PCB's, was transported to and disposed of at SCA in New York through Triangle Resource Industries.

As described in Section III (Chronology of Events), June 4, 1984, all transportation and disposal related activities were closely monitored to assure safety and accuracy of documentation. The shredding and transportation operations were completed within 3 days of their undertaking at a cost of approximately \$17,685.

AR400285

Kane and Lombard Streets
Drum Site
Baltimore, Maryland
EFFECTIVENESS OF REMOVAL (continued)

A. Activities of the Various Agencies

4. Contractors

It should be noted that this drum removal project was accomplished with minimal standby time and significant cost savings. The minimal standby time and cost savings can be attributed to the utilization of on-site labs performing analysis and sound site operations' logistics. This allowed quick turnaround times for analytical results which in turn led to timely decisions regarding disposal and restoration. Significant cost savings were incurred through OSC's decision to utilize shredder and on-site labs.

ARL00286

SECTION VI

PROBLEMS ENCOUNTERED AND RECOMMENDATIONS

AR400287

Kane and Lombard Streets
Drum Site
Baltimore, Maryland

PROBLEMS ENCOUNTERED AND RECOMMENDATIONS

A. Problems Encountered

Operations at the Kane and Lombard Streets Drum Site proceeded in an efficient and timely manner with few difficulties. The problems encountered and issues addressed are summarized below to enable the reader to appreciate the challenges faced during this cleanup, and to serve as a learning tool for future removals.

The physical characteristics of the site (i.e., unstable surface, undermining of surface soils and "soft" spots) created safety concerns during site activities. Therefore, access paths were established for each portion of the site before active site work was initiated in that portion of the site. In addition, during active site work "potters" were constantly utilized to warn the heavy equipment operators about semi-buried drums or other unusual site conditions.

During the latter part of drum removal operations, heat stress became a concern. Average daily temperatures were 80-85°F. This forced on-site personnel to take periodic breaks, leading to a slowdown of site operations.

The implementation of the site stabilization plan was inhibited due to the lack of expedient response and cooperation from MDDNR and Baltimore City officials. MDDNR repeatedly failed to appear on site for scheduled meetings. Baltimore City was unable to advise the OSC regarding the requirement of a permit to install drainage control structures on site. The structure installation of several control structures was delayed while waiting for the above mentioned information.

AR600288

Kane and Lombard Streets
Drum Site
Baltimore, Maryland
PROBLEMS ENCOUNTERED AND RECOMMENDATIONS (continued)

A. Problems Encountered (continued)

During transportation operations, a problem arose whereby the transporter refused to transport one drum, containing PCB's, to the disposal facility. Special arrangements were made to transport this drum separately to the SCA disposal facility in New York.

In addition, the shredder reportedly broke down during shredding operations causing delays in site activities. On one occasion, the ERCS contractor did not have the appropriate replacement parts on site causing the necessary parts to be flown in through emergency services. Though these incidents caused delays in the project, the overall extra costs incurred were minimal.

B. Recommendations

EPA's Resource Conservation and Recovery Act (RCRA) was implemented to minimize improper storage and disposal of hazardous material/wastes. CERCLA was enacted to provide a means to prevent improper dumping and disposal of these wastes from affecting public health and the environment. Many states have enacted similar legislation themselves.

It is recommended that increased inspection and enforcement of the preventative regulations, discussed above, be implemented. It is foreseen that the result will be a reduced amount of illegal dumps and operations requiring future cleanups. Increased public vigilance and Federal and State awareness should result on a more rapid notification of the existence of potentially hazardous illegal dumps such as the Kane and Lombard Streets Drum Site.

AR400289

SECTION VII

Appendices

- A. Maps
- B. Action Memo
- C. Notice to Responsible Parties
- D. POLREPS
- E. Site Safety Protocol/Evacuation Plan/Operational Codes
- F. Photographs
- G. News Articles
- H. Feasibility Studies
- I. Site Stabilization Plan
- J. Delivery Order

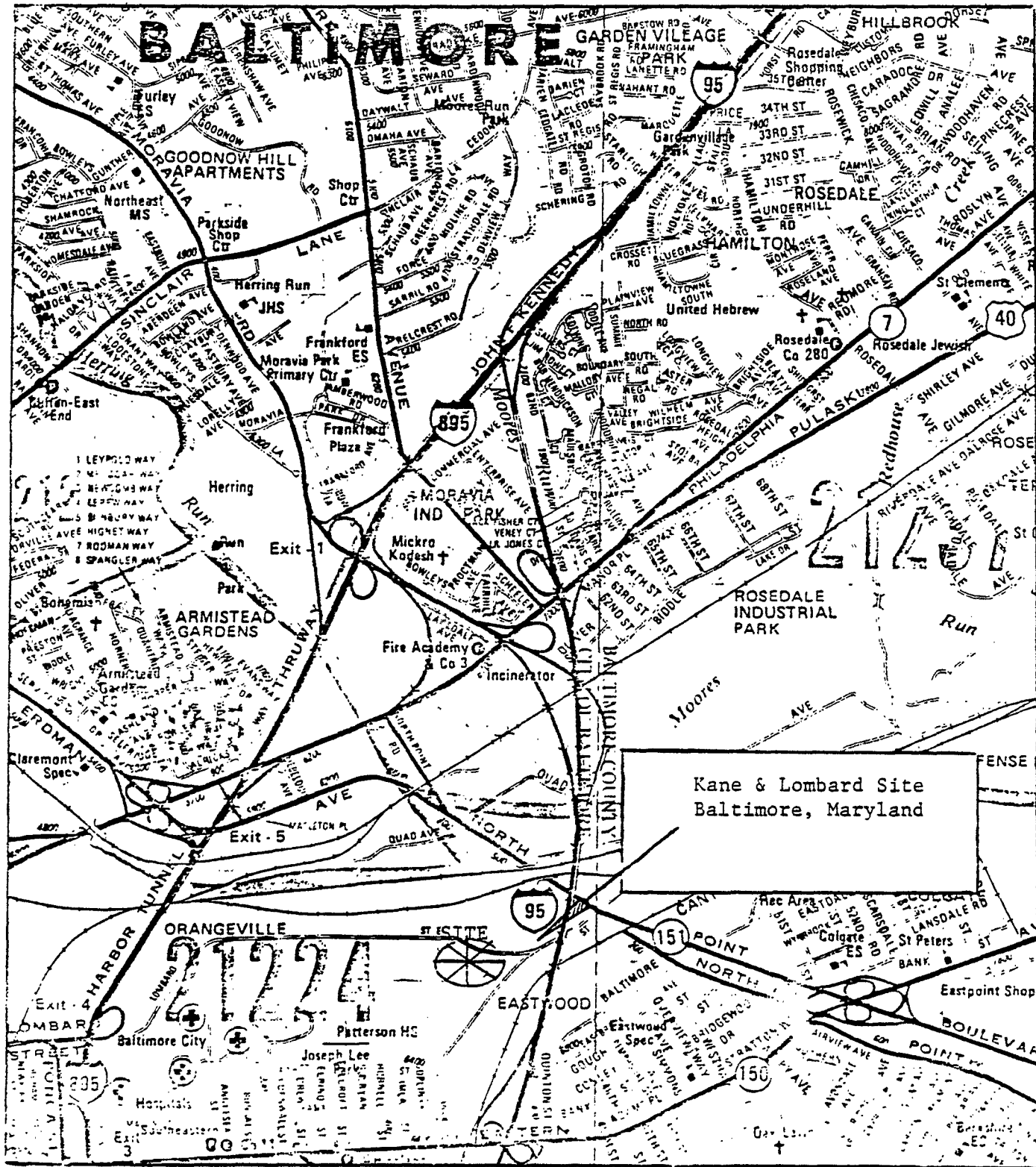
AR400290

APPENDIX A

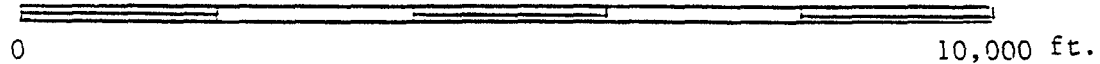
MAPS

AR400291

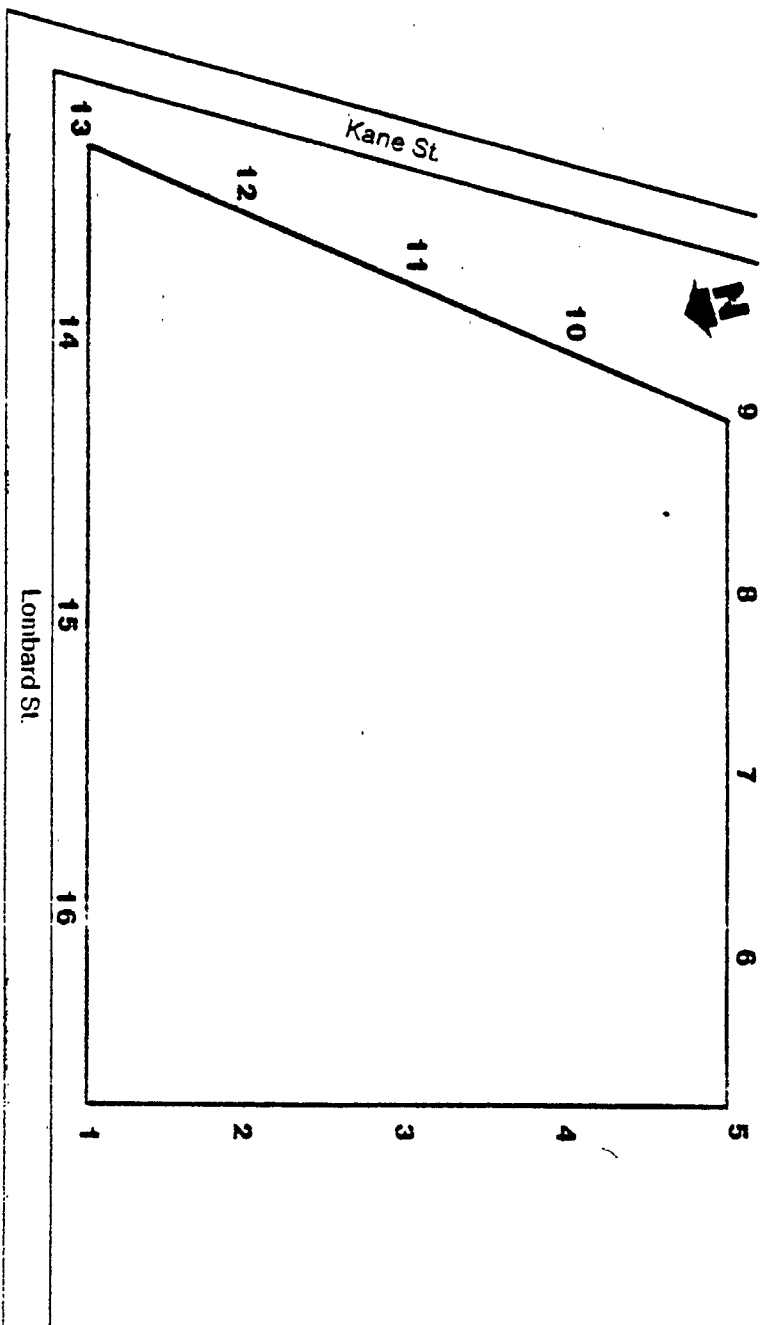
FIGURE 1.



KANE AND LOMBARD DRUM SITE
CERCLA REMOVAL PROJECT
SCALE



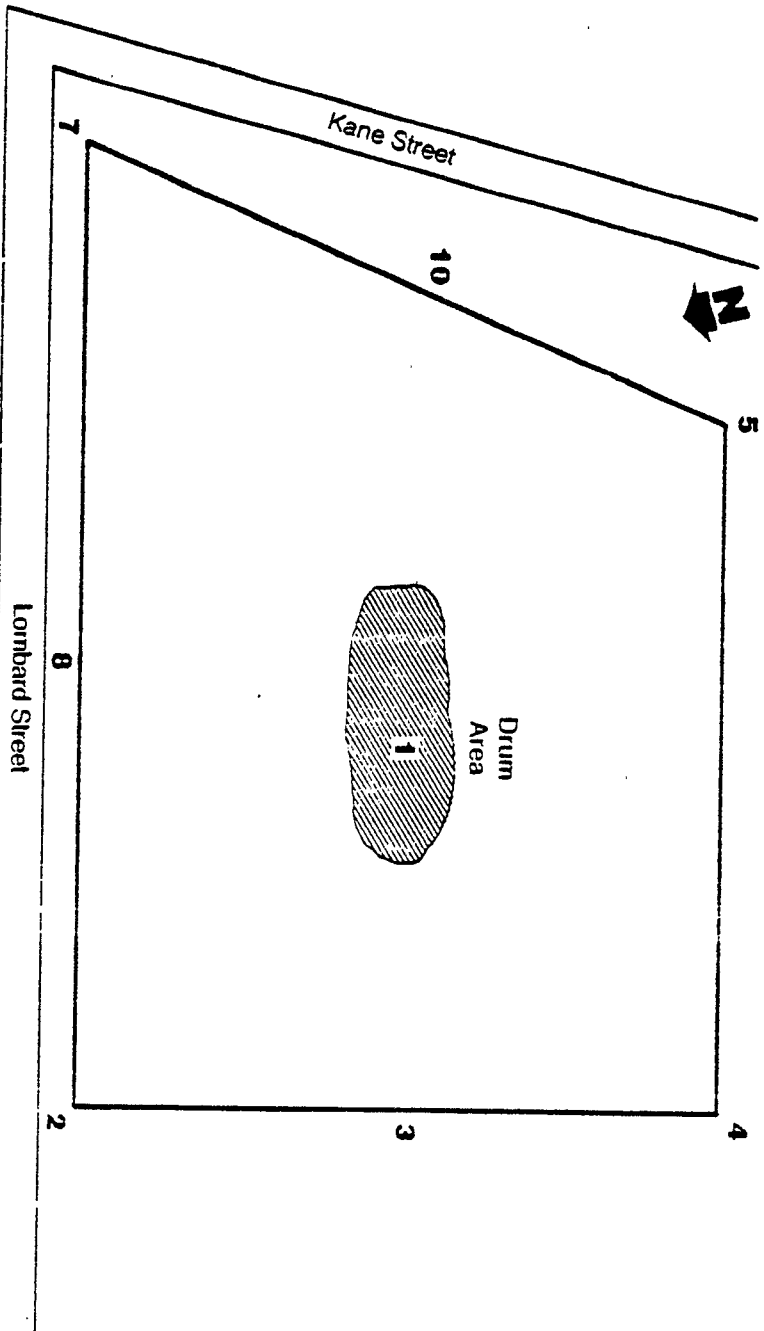
AR400292



**Figure 2. Real time air monitoring stations.
Emergency response/immediate removal action at
Kane and Lombard Streets drum site.**



School 9



**Figure 3. Actual baseline air monitoring stations (for pumps).
Emergency response/Immediate removal action at
Kane and Lombard Streets drum site.**

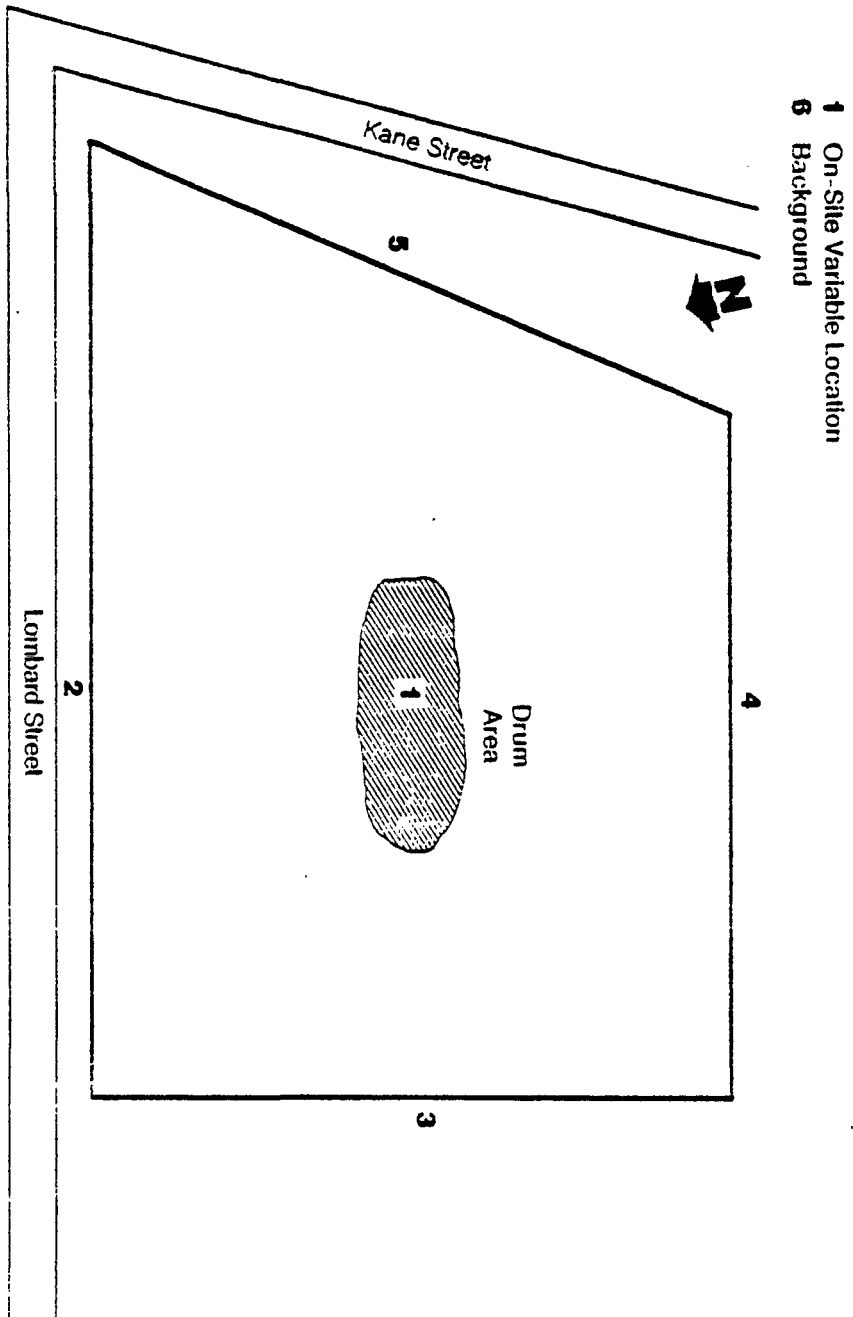


Figure 4. Regular air monitoring stations (for pumps) Emergency response/Immediate removal action at Kane and Lombard Streets drum site.

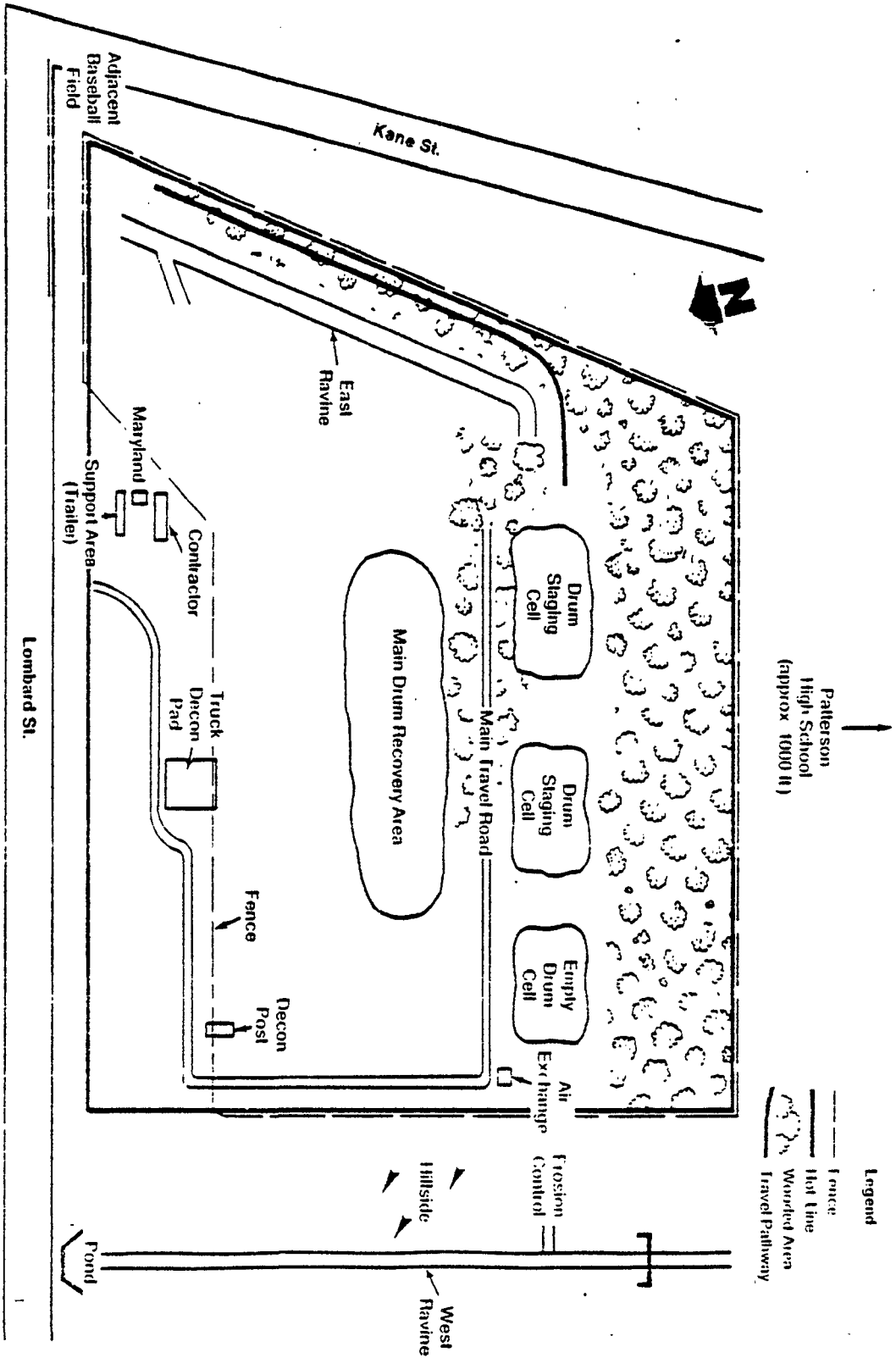


Figure 5. Site sketch.
 Emergency response/immediate removal action at
 Kane and Lombard Streets drum site.

AR400296

1-27 Soil Sample Locations
 W-1 W-2, Water Sample Locations
 W-3

Patterson
 High School
 (approx 1000 ft)

Legend
 1 fence
 1 hot line
 1 wooded area
 1 travel pathway

AR400297

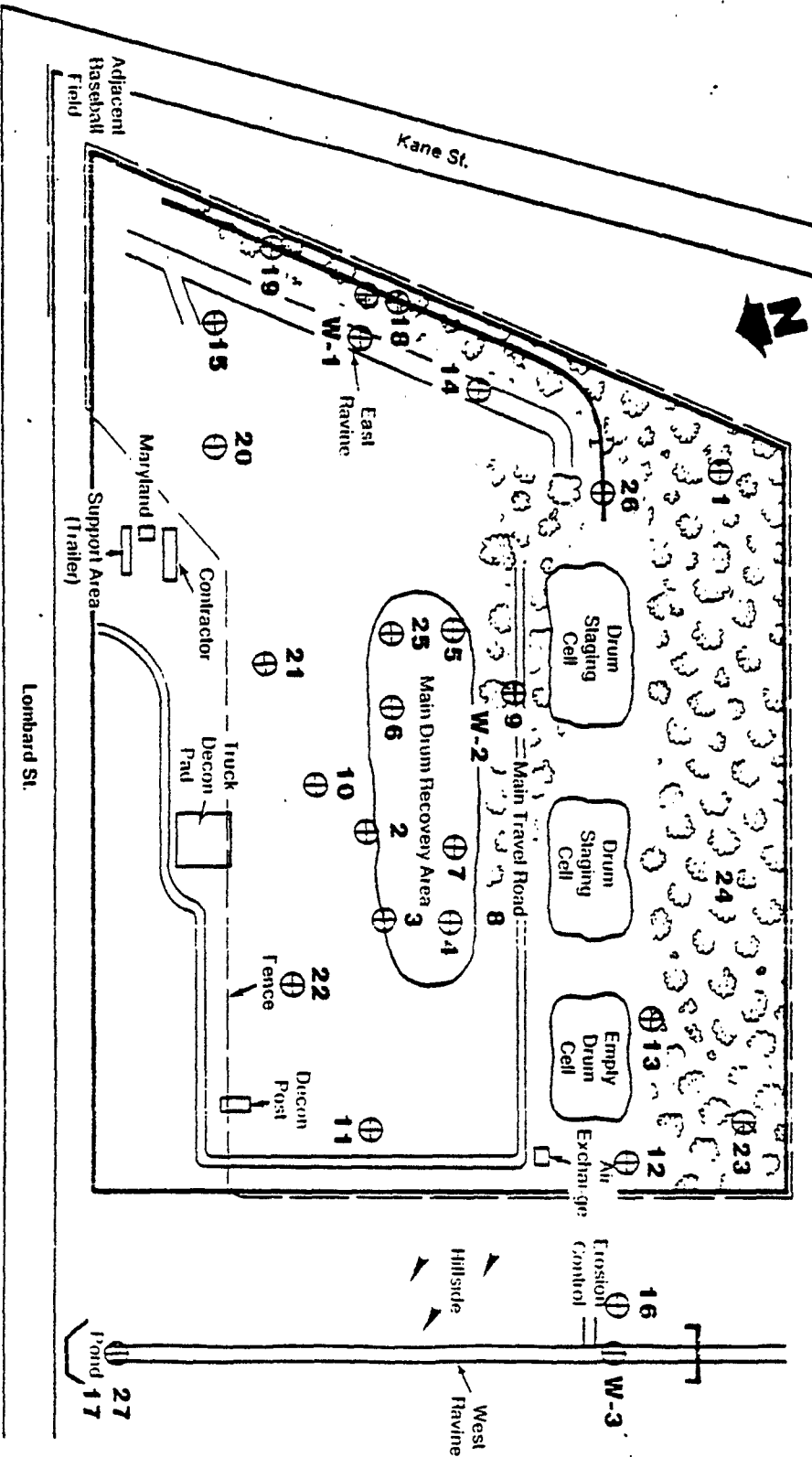


Figure 6. Soil/water sampling locations.
 Emergency response/Immediate removal action at
 Kane and Lombard Streets drum site.

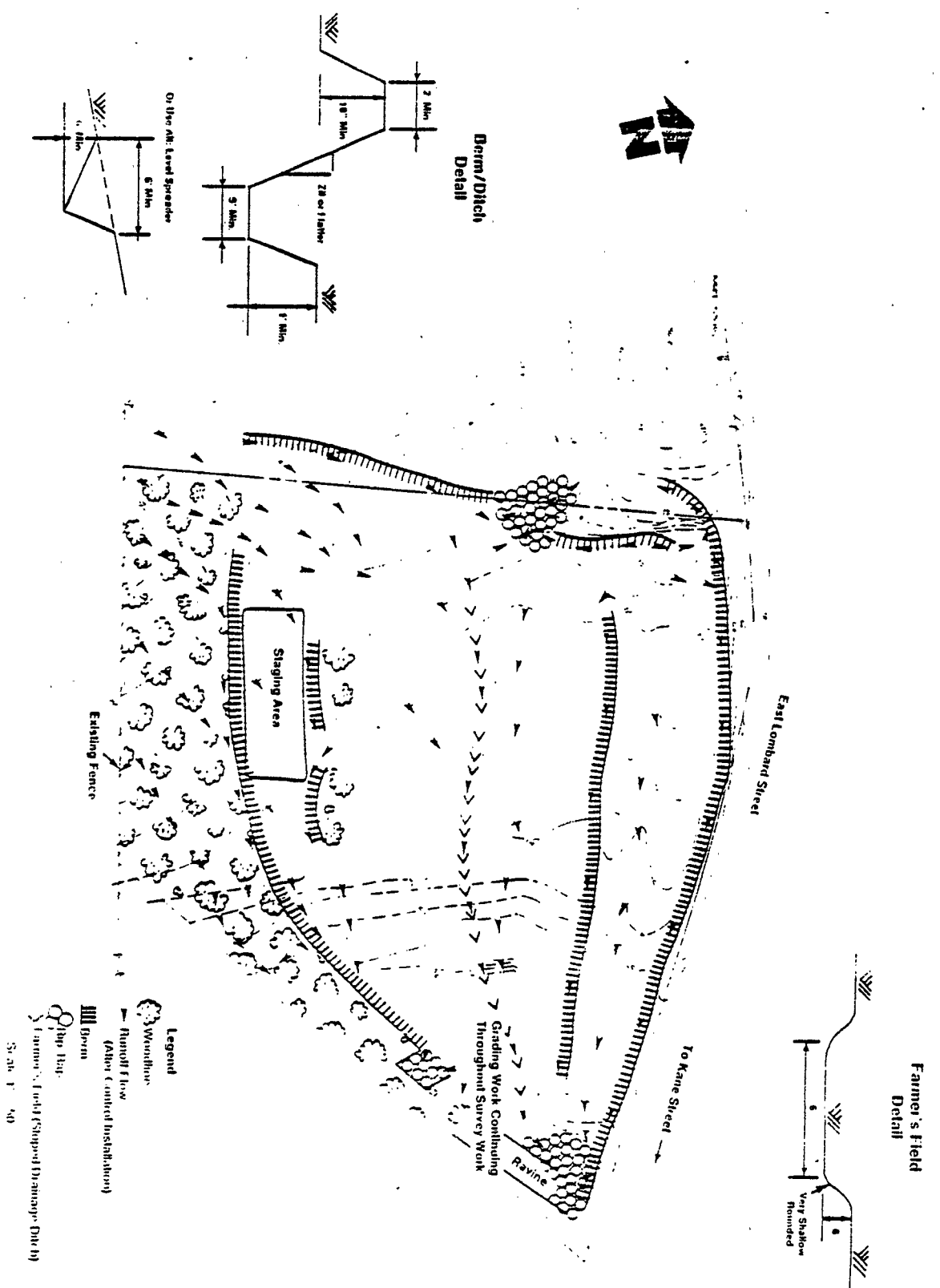


Figure 7. Proposed site stabilization control structures. Emergency response/Immediate response action Kane and Lombard Streets drum site, Baltimore, MD.

AR400298

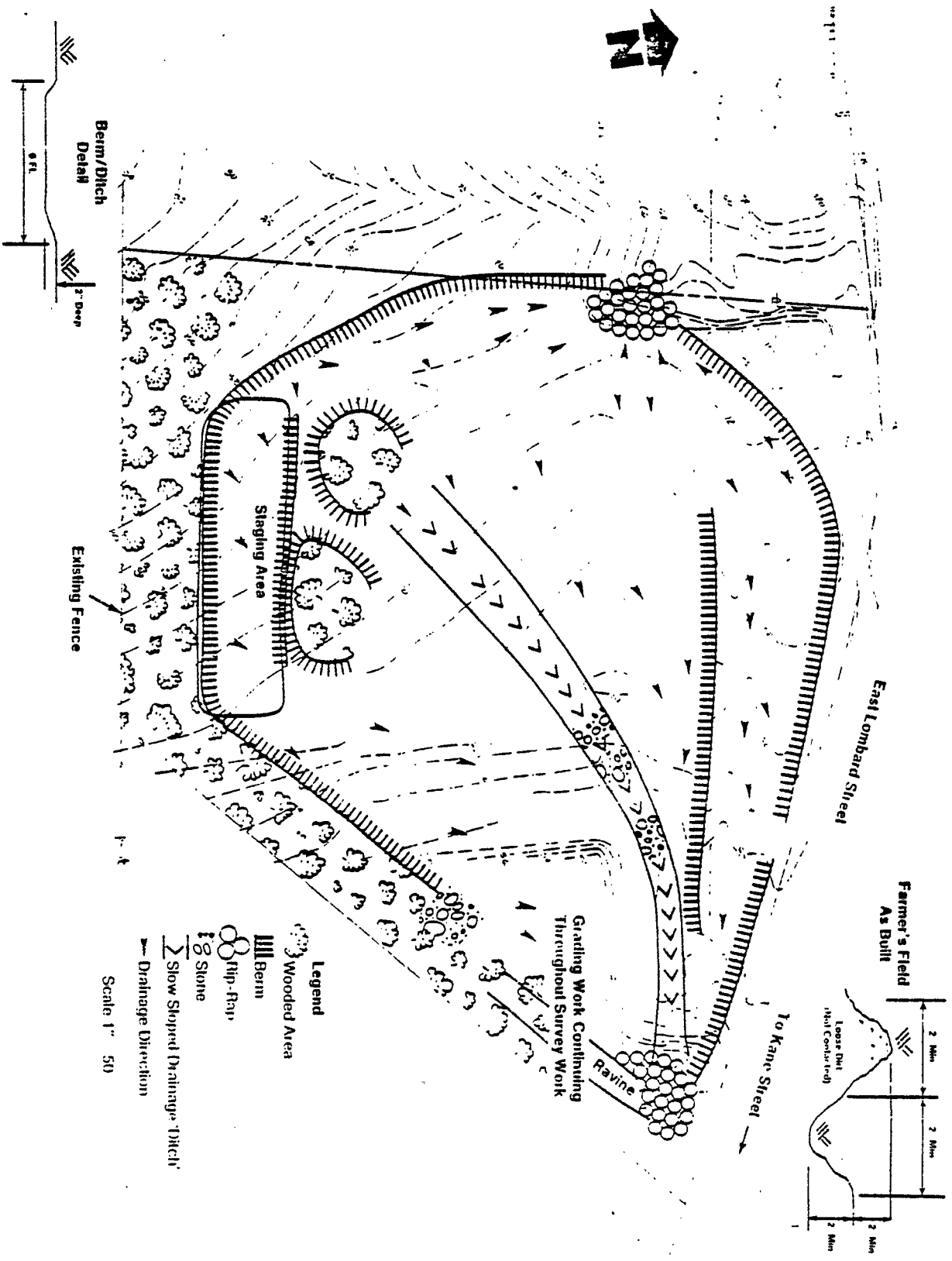


Figure 8. Installed site stabilization structures. Emergency response/Immediate response action Kane and Lombard Streets drum site, Baltimore, MD.

AR400299

APPENDIX B
ACTION MEMORANDUM

AR400300

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.

Philadelphia, Pa. 19106

SUBJECT: Justification for Approval of an Immediate
Removal Action at the Kane & Lombard Street
Drum Site, Baltimore, Maryland

DATE:

- 5/4/84 rgg

FROM: Thomas P. Eichler
Regional Administrator (3RA00)

TO: Lee M. Thomas
Assistant Administrator for Solid Waste
and Emergency Response (WH-562-A)

Issue:

The attached CERCLA Funding Request pertains to the Kane and Lombard Streets Drum Site in Baltimore, Maryland.

A preliminary assessment, performed in accordance with the National Contingency Plan, by my staff and state personnel has identified a direct contact and possible fire and explosion threat at this site, which presents an imminent and substantial danger to the public health and the environment.

Background:

Section 104 of CERCLA calls for the initiation of an Immediate Removal Action whenever there is a release or a substantial threat of a release into the environment of any pollutant or contaminant which may present an imminent and substantial danger to the public health and/or the environment.

Pursuant to Delegation of Authority 14-1-A (4/16/84), which authorizes the Regional Administrator to approve CERCLA Removal Actions with a total cost of less than \$1,000,000, I have approved the use of CERCLA funds to control and stabilize this site.

Attachment

AR400301

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts

Philadelphia, Pa. 19106

SUBJECT: Immediate Removal Request for the Kane and Lombard Streets Site, Baltimore, Maryland
Action Memorandum

DATE:

FROM: Robert E. Caron, On-Scene Coordinator
Emergency Response Section (3HW22)

TO: Thomas P. Eichler
Regional Administrator (3RA00)

THRU: Stephen R. Wassersug, Director
Hazardous Waste Management Division (3HW00)

I. Purpose:

A preliminary assessment performed by the on-scene coordinator in conjunction with the State of Maryland, and in accordance with the National Contingency Plan, has identified a direct contact and possible fire and explosion threat at this site. The OSC has determined that this site presents an imminent and substantial danger to the public health and the environment, prompting this request for Immediate Removal funds to control and stabilize this site.

II. Background:

A. 1) Site Setting/Description

The site is located in Baltimore, Maryland, in the Orangeville subdivision, southwest of the intersection of Kane and Lombard Streets, directly adjacent to Patterson High School on the east boundary and within one quarter mile of Baltimore City Hospital. Other nearby properties are industrial/commercial. Residential properties are within 1/3 of a mile.

2) General Character of the site

Rusted, bulging, damaged and decaying 55 gallon drums are chaotically piled at several locations on this 8.3 acre site (see sketch). The OSC estimates that as many as 1000 drums may be present on the surface. On the eastern border an intermittent stream that flows in a northerly direction exists with pools of standing water. Drums can be seen protruding from the bank along this stream.

A Baltimore City Health representative indicated that a dump was operated on this property about five or ten years ago, that "any type of waste was dumped there," that numerous fires occurred at the site, and that a child was injured when he fell through the surface and was burned by an underground fire. Children also play in the area of a large concrete pipe dumped along the east side of the property. In addition, the chain link fence at the high school boundary has been breeched in several locations. Well used pathways are evident on site leading to these fence breeches, indicating frequent use of the property for high school access.

AR400302

The west side of the property has a "lift," resembling the lift of a landfill, rising upwards about ten feet. Erosion has exposed refuse materials, that have been landfilled, with protruding drums and other debris visible.

3) Waste Management

There are no structures or buildings on-site. The site is considered to be "undeveloped." The fill has never been properly covered, capped, or vegetatively stabilized.

4) Surrounding Areas

As earlier stated, Patterson High School borders the site to the east. A six foot chain link fence is also along this border. The fence has been breeched with pathways through the site. Approximately 1/4 mile west of the site is Baltimore City Hospital. In general, the surrounding area is zoned both industrial and residential.

B. Quantity and Types of Substances Present

During the preliminary assessment performed on May 1, 1984, the OSC estimates that at least 1000 surface drums are present on-site. Other pertinent observations are as follows:

- Many drums appear to contain paint wastes.
- Several drums, opened during the assessment, contained solvents and yielded air readings inside the drum in excess of 2000 ppm and explosive readings (70% LEL).
- A recent fire on site, reportedly caused by vandalism, involved those drums. Responding fire fighters reported several explosions.
- The OSC observed school students on-site, smoking.
- Previous State sampling indicates the presence of volatile organics (Toluene, Xylene), heavy metals (Chromium) and chlorinated organics, many of which are suspected carcinogens.
- Approximately one half of the drums appear to contain material.

C. This site has not been ranked and therefore is not an NPL site. The OSC has provided remedial personnel with all available information to be used for NPL consideration.

AR400303

III. Threat

A. Threat of Exposure to Public or the Environment

Rusting, leaking, spilling, decaying surface drums pose a direct contact threat and possible fire and explosion threat, to any and all persons who may frequent this site. In addition, the site's close proximity to the high school and hospital places these sensitive populations at risk in the event of a fire involving hazardous wastes.

Ground water contamination has been shown (see Section II-B of this document). However, there is no known ground water use in this area.

The site is known to be frequented by students and by residents.

B. Evidence of Extent of Release

Off-site sampling has not been performed due to property access problems. Two monitoring wells on site do indicate that ground water has been contaminated.

C. Previous Actions to Abate Threat

To date, no action has been taken at this site. State efforts have centered around securing responsible party cleanup. To date, these actions have been unsuccessful.

D. Current Actions to Abate Threat

There are no current actions to abate the threat posed by this site.

AR400304

IV Enforcement:

A. Active/Inactive

The OSC intends to issue both "oral" and written "notice" to the responsible party/property owner upon approval of this request. The OSC has initiated the 14-day enforcement protocol, and is working closely with enforcement personnel and Regional Counsel. Enforcement personnel have determined that the present property owner does not have the wherewithall to fund a cleanup of this magnitude. As a result, the enforcement branch has elected not to issue an order of any type, but to pursue a cost recovery action at project conclusion.

The State of Maryland issued a Complaint and Order (attached) in August of 1983, ordering the present property owner to clean up. The owner has appealed this order. To date, the State has been unsuccessful in forcing compliance, prompting their request to EPA for assistance. The present property owner claims no responsibility for the presence of drums on this property.

B. Status of Notice Letters

A Section 104(e) letter was sent to the present property owner. The owner has responded via telecon as stated above, claiming no knowledge or responsibility for these drums on his property.

AR400305

V Proposed Project and Cost:A. Objectives

The OSC has determined that a phased approach would best suit this project due to the need to immediately eliminate the direct contact threat and fully assess and eliminate any other potentially acute hazards on-site. These are as follows:

- Phase I - Security
Erection of security fencing
- Phase II - Measuring and sampling of drums, soils and water to fully assess areas of concern.
- Phase III - Removal and disposal of surface drums concurrent with Phase II, remove drums shown to contain hazardous and toxic substances.
- Phase IV - Restoration
Backfill, regrade, topsoil and hydroseed as necessary to assure site stability such that no further acute problems can develop.

B. Estimated Costs

<u>Phase I</u>	- Security	<u>Cost</u>
	- Approx. 2000 linear feet of fencing	\$ 30,000
<u>Phase II</u>	- Measuring and sampling	
	Analytical Costs	70,000
<u>Phase III</u>	- Drum removal and disposal	
	Labor, Transportation and Disposal	500,000
<u>Phase IV</u>	- Restoration	50,000
TAT/USCG-AST		25,000
ERT/IT		20,000
Intramural		<u>15,000</u>
	Total Project Ceiling	\$710,000

No CERCLA monies have been allocated to this site to date.

AR400306

C. Project Schedule

The OSC estimates approximately 30 days will be necessary to complete this project.

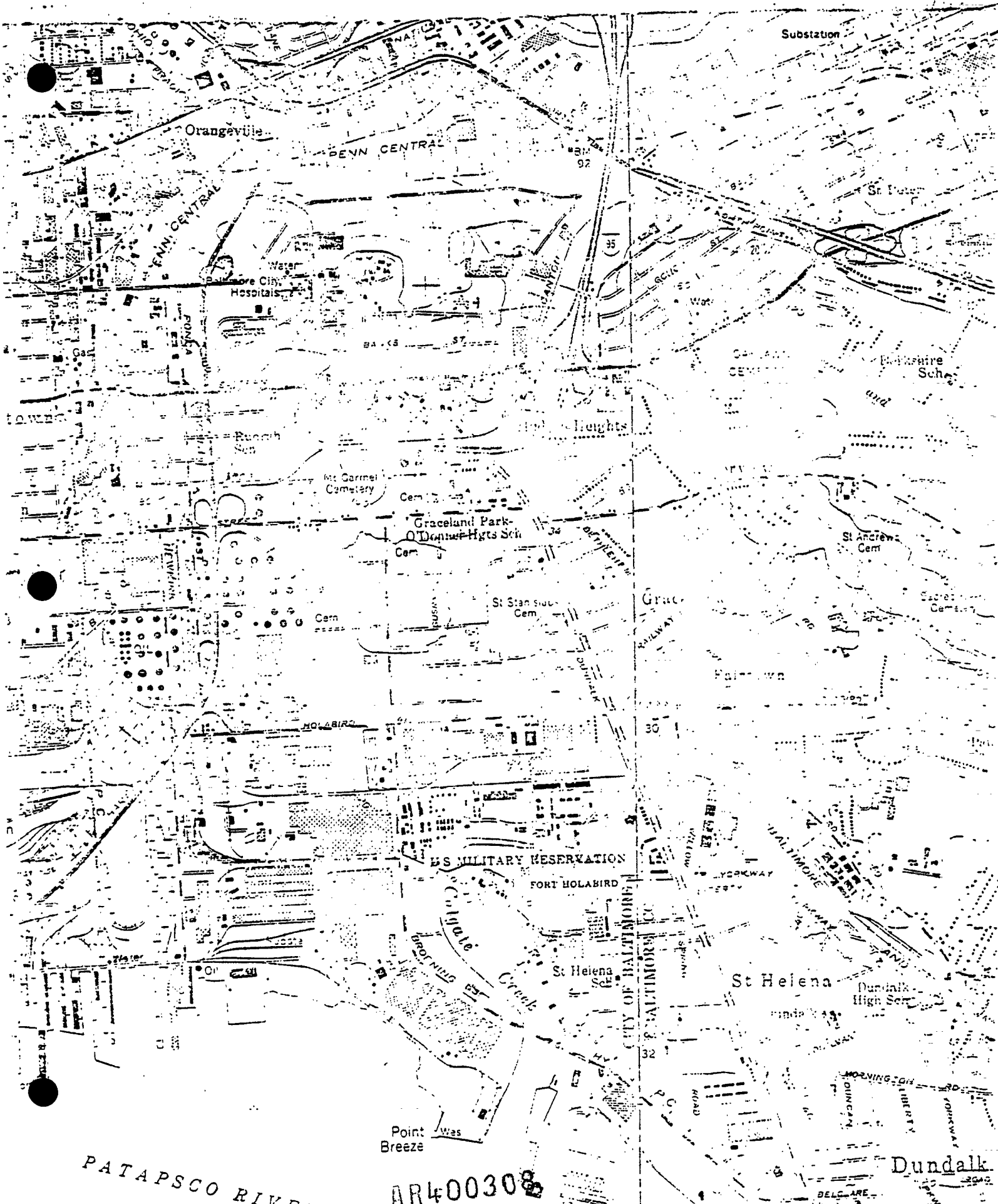
VI Regional Recommendations

Because conditions at the Kane and Lombard Streets Drum Site meet the criteria set forth in the National Contingency Plan, Section 300.65, for an Immediate Removal, I recommend your approval of the Immediate Removal Request. The estimated total project costs are \$710,000 of which \$650,000 are for extramural cleanup contractor costs. It should be noted that Phase II, measuring and sampling, will be designed to allow for and preplan on a fastpace, design and strategy for cleanup to provide cost effectiveness in the removal. This Phase will be coordinated by ERT.

You may indicate your approval or disapproval by signing below:

Approve: _____ Date: _____

Disapprove: _____ Date: _____



Substation

Orangeville

PENN CENTRAL

BM 92

PENN CENTRAL

Water
More City
Hospitals

84 63

57

35

St. Peter

St. Andrew Sch

Dundalk Heights

Ruomb Sch

Mt. Carmel
Cemetery

Graceland Park-
O'Donnell Hgts Sch

St. Andrew
Cem

St. Stanislaus
Cem

Grac

Sacred
Cem

HOLABIRD

US MILITARY RESERVATION

FORT HOLABIRD

30

CITY OF BALTIMORE
BALTIMORE

WILLOW

LYCKWAY

BALTIMORE

St. Helena

St. Helena

Dundalk
High Sch

Point
Breeze

PATAPSCO RIVER

AR40030

Dundalk

Kane and Lombard Street Drum Site, Baltimore, MD

North

Industrial

Memorial Hospital

1/4 mile

(3.5 acres)

Lombard

Drums

Drums

1.0



400'

Patterson High School

Take

Franco

AR400309

1-0001497124 05/20/81

Telegram

ICS 110001C 00N

01291 05-03 1223P COT 1016

ICS 110001C

4-020100124 05/20/81

ICS 110001C 00N

2022001016 1000 WASHINGTON DC 41 05-03 1221P EST

FMS 110001C 00N 110001C 00N 110001C 00N 110001C 00N 110001C 00N

6 AND 041001 00N

PHILADELPHIA PA 19106

PLEASE EXPEDITE THE STATE OF DELAWARE REQUEST FOR EQUIPMENT 10000

UNDER THE SUPPORTIVE PROGRAM TO CLANAP PRIVATELY OWNED DUNE 14

A PUBLIC HIGH SCHOOL AND MAJOR HOSPITAL MAKE CONTAINMENT AND CLANAP

MOST URGENT. THANK YOU

BARBARA A. STEINACKER MEMBER OF CONGRESS

2401 KAYBURN

WASHINGTON DC 20515

WU 1201-SF (RS-69)

AR400310

IN THE MATTER OF:

EDWARD AZRAEL,
HARIETTA AZRAEL, and
CELE LANDAY.

SECRETARY OF HEALTH AND MENTAL
HYGIENE

WASTE MANAGEMENT ADMINISTRATION

C-O-83-164

MEMORANDUM IN SUPPORT OF COMPLAINT AND ORDER AND
COMPLAINT AND REQUIREMENT TO FILE A WRITTEN REPORT

The Waste Management Administration, through its attorney, James J. Lyko, submits the following Memorandum in Support of the Complaint and Order and Complaint and Requirement to File a Written Report in this case.

FACTS

In 1962, Edward and Harietta Azrael, and Albert and Cele Landay acquired ownership of a piece of land located south of what is now Lombard Street in Baltimore City, near City Hospitals and Patterson High School. (See, Deed, State's Exhibit 10, and the red-outlined area indicated on the Department of Public Works plat map, State's Exhibit 2.)

In November, 1980, State Inspector Paul Stancil discovered that between 400 and 500 drums were disposed of at the Azrael-Landay property (Tr. 19). The drums and other debris were visible from the I-95 overpass near the site (Tr. 11). The drums were located mainly along the back (southern) portion of the property and also along the western border, where many of the drums were protruding from a bank, where erosion had exposed them (Tr. 18). Some drums were also visible in the vicinity of the stream bed that lies east of the property (Tr. 75). The majority of the visible drums were rusted, damaged, and had holes in them (Tr. 20). Some of the drums were lying on top of dead vegetation (Tr. 68). The opened drums had ash-like and tar-like material in them (Tr. 12), varying between one-quarter and one-half full

AR400311

(Tr. 19), and at least one drum was full of a liquid material (Tr. 13). (Several of the damaged and deteriorated drums at the site, including many that were partially buried, are depicted in the seven photographs admitted as State's Exhibits 7, 8, and 9.)

In addition to the drums at the Azrael-Landay property, Inspector Stancil observed "a lot of trash and debris dumped along the front of the property" (Tr. 13). Indeed, on November 7, 1980 (the first day Stancil went to the site), a car pulled onto the site and dumped household refuse in the Inspector's presence, with the driver saying "everybody dumps here; I thought this was a local landfill" (Tr. 13), and also informing Inspector Stancil that he had seen other people dumping there "all the time" (Tr. 14). The frequency of dumping was such that a scavenger went by the site "every day" to retrieve items dumped there (Tr. 20). During an August, 1983 visit to the site, State inspectors observed recent trash dumping, consisting of household debris, white goods, broken furniture, trashbags, and demolition debris, in a quantity approximately equivalent to a couple dozen pick-up truck loads of refuse (Tr. 75).

A Baltimore City Health Department representative indicated that a dump was operated at the Azrael-Landay site about five or ten years ago, that "any type of waste was dumped there," that numerous fires had occurred at the site, and that a child had been injured when he fell through the surface and was burned by an underground fire (Tr. 38-9). Children also play in the area of large concrete pipes dumped along the east side of the property (Tr. 20). Regarding the extent of refuse dumping, the west side of the property has a "lift" resembling the lift of a landfill, rising upwards about ten feet (Tr. 17); from the lift, which rises above the elevation of the surrounding ground, erosion has exposed refuse materials that have been landfilled,

with protruding drums and other debris visible (Tr. 64; see also the left-hand photo on State's Exhibit 8). The lift has never been properly covered, capped, or vegetatively stabilized (Tr. 64). (The location of the drums in the lift near the west-side property line is depicted on the right-hand portion of the Whisman, Requardt & Associates drawing, admitted as State's Exhibit 11.)

A stream flows along the east side of the Azrael-Landay property separating the site from the Patterson High School property (Tr. 17). The stream, which is approximately 15 feet across (Tr. 66), flows northerly, then goes underground (Tr. 18). The Azrael-Landay site is sloped toward the east (Tr. 17), such that if there was any surface runoff, it would move toward the stream (Tr. 66).

The Azrael-Landay site is an unimproved piece of land (Tr. 163). When entered by State inspectors, the property had "no boundary or fence or anything" impeding access, and no sign or gate (Tr. 12; also Tr. 73-4). The site is readily entered by vehicle through a depression constructed into the street curbing, from which a dirt access road leads onto the site (Tr. 12). According to Mr. Azrael, "we rarely visit our property and have no means of policing it" (Tr. 157).

State inspectors took samples from drums at the Azrael-Landay site, one of which was from a drum of liquid material which was uprooted in order to get into the top, and the others were of an ash-like material (Tr. 17). (The samples themselves are admitted as State's Exhibits 3 & 4, Samples GR251 and GR617, respectively). Analysis of the liquid sample, GR251, by the Water Resources Administration Laboratory indicated that the material contained 91.3% xylene (State's Exhibit 5); expert testimony at the hearing indicated that a material containing 91.3% xylene would have a flashpoint of less than 60° C (Tr. 126-



OFFICE OF ENVIRONMENTAL PROGRAMS
DEPARTMENT OF HEALTH AND MENTAL HYGIENE

CONVENT BOSTON MARKET * BALTIMORE MARYLAND 21201 * APPROVED BY * 18-3120

Charles R. Bush, Jr., Esq. Secretary

THE PUBLIC HEALTH SERVICE
U.S. DEPARTMENT OF HEALTH, EDUCATION AND WELFARE
WILSON M. GOULDEN, Assistant Secretary

August 3, 1983

CERTIFIED MAIL

Mr. Edward Azrael,
Harrietta Azrael, and
Celia Landay
Azrael and Gann
1700 Maryland National Bank Building
Baltimore, Maryland 21202

Dear Mr. Azrael:

As a result of the recent investigations conducted at your Kane and Lombard Streets property, the Waste Management Administration has determined that a significant threat to public health and safety exists. Therefore, the Waste Management Administration has issued the enclosed Compliance Order.

If you have any questions concerning this matter, please call or write Mr. Paul G. Thompson, Regional Chief, Enforcement Program, at (301) 453-3800.

Sincerely,

Ronald Wilson
Ronald Wilson, Director
Waste Management Administration

RM:amc
Enclosure

- cc: James J. Lyke, Esquire
- Dr. John B. DeHoff
- William F. Clark, Esquire
- Mr. Fredric Sachs
- Mr. Arthur H. Caple
- Mr. Paul G. Thompson
- Mr. Paul Stancil

RECEIVED

AUG 4 1983

REG. SECTION

AR400316

IN THE MATTER OF:

* SECRETARY OF HEALTH AND MENTAL HYGIENE

Mr. Edward Azrael,
Harietta Azrael and
Cele Landay

SERVE ON:

Mr. Edward Azrael
Azrael and Gann
1700 Maryland National
Bank Building
Baltimore, Maryland 21202

* WASTE MANAGEMENT ADMINISTRATION
201 West Preston Street
Baltimore, Maryland 21202

* C-0-83-184

COMPLAINT AND ORDER

Whereas, the State of Maryland, Department of Health and Mental Hygiene, Office of Environmental Programs, pursuant to the powers and duties vested in the Secretary of Health and Mental Hygiene by Health-Environment Article, Sections 1-301 and 7-201 through 7-268, inclusive, and 9-501 through 9-344, inclusive, Annotated Code of Maryland, and delegated to the Director, Waste Management Administration, has reasonable grounds to believe that Edward Azrael, Harietta Azrael and Cele Landay have violated Maryland law regarding Controlled Hazardous Substances and Water Pollution Control

Whereas, on November 7, 1980, an abandoned drum located on your property at East Lombard Street and York Street, Ward 21, Section 47, Block 6323, Lot 21/25, Baltimore City, containing numerous drums of liquids, sludges and ashes was discovered by a representative of the Waste Management Administration.

Whereas, on November 12, 1980, samples were collected from drums exposed at the surface, and subsequent analysis detected the presence of Controlled Hazardous Substances, specifically spent non-halogenated solvents (Toluene and Xylene), and Controlled Hazardous Substances exhibiting the characteristic of E.P. Toxicity, specifically Hexavalent Chromium.

Whereas, on September 23, 1982, air monitoring at the site has provided evidence that organic vapors were being released from the site in sufficient quantities to pose a threat to human health and environment.

AR400317

Whereas, Edward Azrael, Harietta Azrael and Cele Landay have maintained a Controlled Hazardous Substance facility without a facility permit issued by the Office of Environmental Programs, in violation of Health-Environmental Article, Section 7-232(a) and of COMAR 10.51.07.010.

Whereas, said drums of Controlled Hazardous Substances are rusted, open and leaking and exist in a position likely to pollute surface and groundwaters of the State, in violation of Health-Environmental Article, Section 9-322, and of COMAR 10.50.01, Regulations .05A and .08B.

Therefore, it is ORDERED by the Director of the Waste Management Administration that Edward Azrael, Harietta Azrael and Cele Landay shall:

1. By September 30, 1983, remove all drums, ash, sludge and contaminated soils at the Kane and Lombard sites. This removal is to be accomplished under the direction of the Waste Management Administration, Enforcement Program, and done in such a manner that any and all presently or newly exposed hazardous waste is removed.
2. Within 15 days of receipt of this Order, construct a fence around the property in order to secure said property against unauthorized access.

This Order may be appealed in accordance with the Administrative Procedure Act, Article 41, Section 244 et seq., and in accordance with Health-Environmental Article, Section 7-261(b) and 9-307(b), Annotated Code of Maryland, by filing a Request for Hearing within 10 days after receipt of this Order. Such a Request for Hearing should be addressed and sent to William F. Clark, Esquire, Acting Chief Hearing Officer, Department of Health and Mental Hygiene, 300 West Preston Street, Baltimore, Maryland 21201. If a hearing is requested, you will be notified in writing by the Hearing Officer as to the time and place of the hearing. Any such hearing will be held in the manner provided in the Administrative Procedure Act for hearings in contested cases.

AR400518

Page 3

8/2/83
DATED

Approved as to form and legal
sufficiency this 2 day
of August, 1983

Ronald Nelson
Ronald Nelson, Director
Waste Management Administration

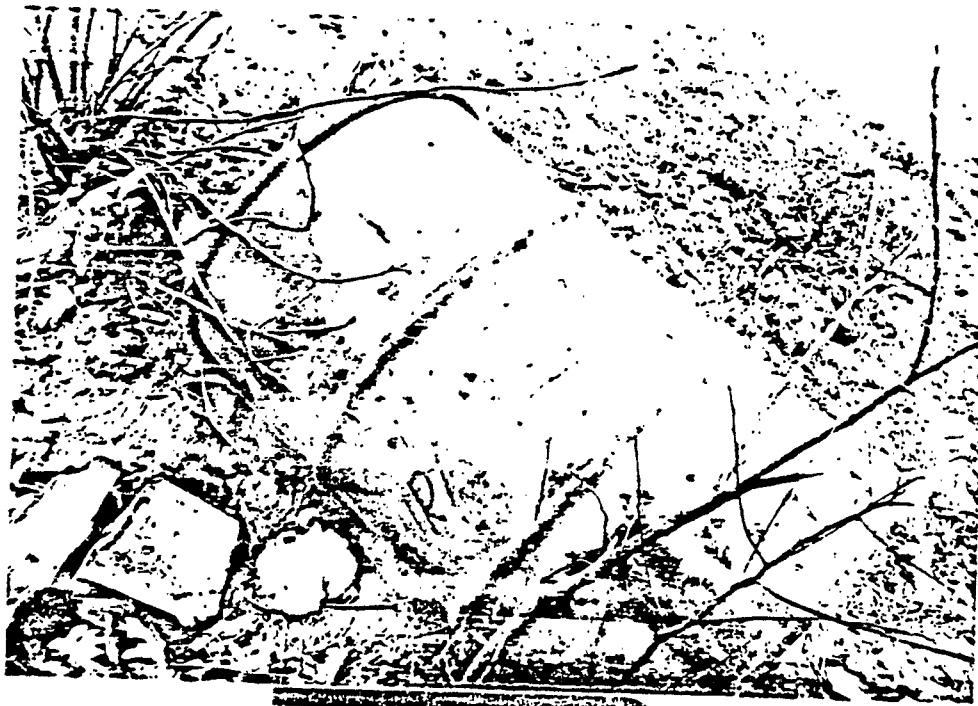
James C. ...
James C. ...
Assistant Attorney General

AR400319

KANE AND LOMBARD DRUM SITE



SURFACE DRUMS



SURFACE DRUM

AR400320

KANE AND LOMBARD DRUM SITE



DRUM MOUND



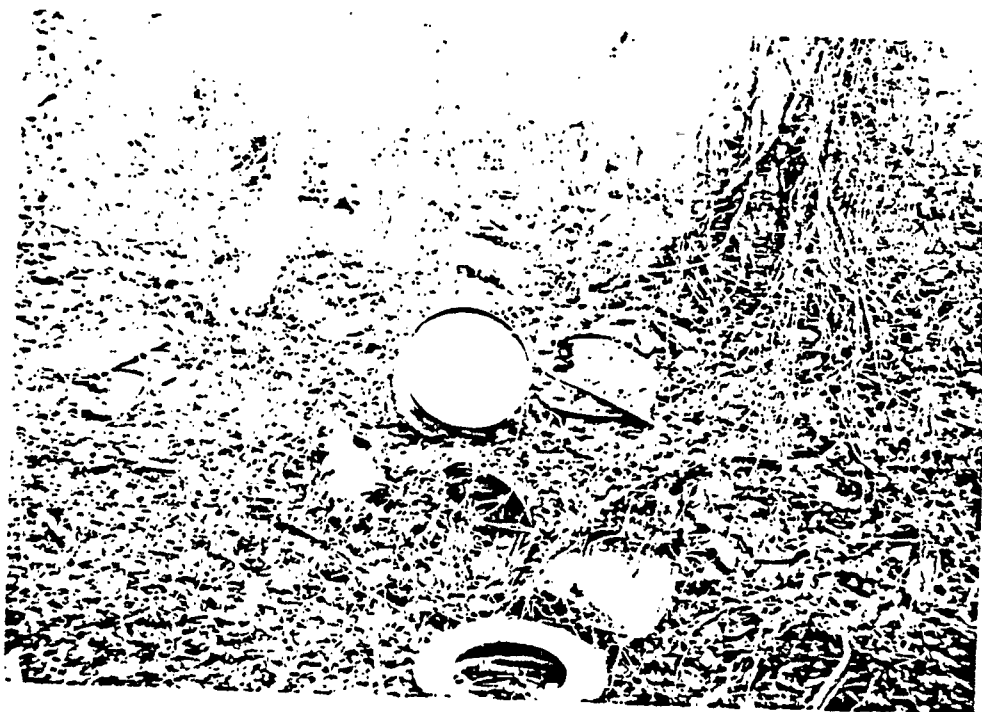
RECENT BURN AREA

AR400321

KANE AND LOMBARD DRUM SITE

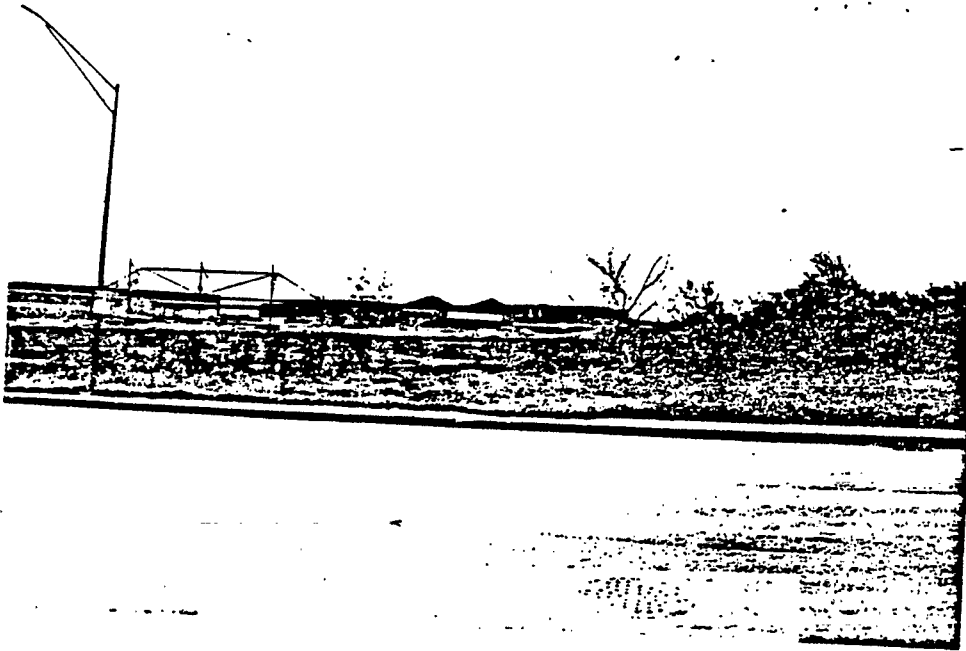


EXPOSED DRUMS IN STREAM BANK.



AR60322

KANE AND LOMBARD DRUM SITE



PATTEPSON HIGH SCHOOL-SITE ON RIGHT



SURFACE DRUMS IN BURN APEA

AR400323

APPENDIX C

NOTICE TO RESPONSIBLE PARTIES

AR400324

IN THE MATTER OF:

EDWARD AZRAEL,
HARIETTA AZRAEL, and
CELE LANDAY

* SECRETARY OF HEALTH AND MENTAL
HYGIENE

* WASTE MANAGEMENT ADMINISTRATION

* C-O-83-181

MEMORANDUM IN SUPPORT OF COMPLAINT AND ORDER AND
COMPLAINT AND REQUIREMENT TO FILE A WRITTEN REPORT

The Waste Management Administration, through its attorney, James J. Lyko, submits the following Memorandum in Support of the Complaint and Order and Complaint and Requirement to File a Written Report in this case.

FACTS

In 1962, Edward and Harietta Azrael, and Albert and Cele Landay acquired ownership of a piece of land located south of what is now Lombard Street in Baltimore City, near City Hospitals and Patterson High School. (See, Deed, State's Exhibit 10, and the red-outlined area indicated on the Department of Public Works plat map, State's Exhibit 2.)

In November, 1980, State Inspector Paul Stancil discovered that between 400 and 500 drums were disposed of at the Azrael-Landay property (Tr. 19). The drums and other debris were visible from the I-95 overpass near the site (Tr. 11). The drums were located mainly along the back (southern) portion of the property and also along the western border, where many of the drums were protruding from a bank, where erosion had exposed them (Tr. 18). Some drums were also visible in the vicinity of the stream bed that lies east of the property (Tr. 75). The majority of the visible drums were rusted, damaged, and had holes in them (Tr. 20). Some of the drums were lying on top of dead vegetation (Tr. 68). The opened drums had ash-like and tar-like material in them (Tr. 12), varying between one-quarter and one-half full.

AR400325

(Tr. 18), and at least one drum was full of a liquid material (Tr. 13). (Several of the damaged and deteriorated drums at the site, including many that were partially buried, are depicted in the seven photographs admitted as State's Exhibits 7, 8, and 9.)

In addition to the drums at the Azrael-Landay property, Inspector Stancil observed "a lot of trash and debris dumped along the front of the property" (Tr. 13). Indeed, on November 7, 1980 (the first day Stancil went to the site), a car pulled onto the site and dumped household refuse in the Inspector's presence, with the driver saying "everybody dumps here; I thought this was a local landfill" (Tr. 13), and also informing Inspector Stancil that he had seen other people dumping there "all the time" (Tr. 14). The frequency of dumping was such that a scavenger went by the site "every day" to retrieve items dumped there (Tr. 20). During an August, 1983 visit to the site, State inspectors observed recent trash dumping, consisting of household debris, white goods, broken furniture, trashbags, and demolition debris, in a quantity approximately equivalent to a couple dozen pick-up truck loads of refuse (Tr. 75).

A Baltimore City Health Department representative indicated that a dump was operated at the Azrael-Landay site about five or ten years ago, that "any type of waste was dumped there," that numerous fires had occurred at the site, and that a child had been injured when he fell through the surface and was burned by an underground fire (Tr. 38-9). Children also play in the area of large concrete pipes dumped along the east side of the property (Tr. 20). Regarding the extent of refuse dumping, the west side of the property has a "lift" resembling the lift of a landfill, rising upwards about ten feet (Tr. 17); from the lift, which rises above the elevation of the surrounding ground, erosion has exposed refuse materials that have been landfilled,

... and other debris visible (Tr. 84; see also the ... State's Exhibit 3). The lift has never been ... (Tr. 84). (The location of the drums in the lift near the west-side ... is depicted on the right hand portion of the Whitman, Reardon & Associates drawing, admitted as State's Exhibit 11.)

A stream flows along the east side of the Azrael-Landay property, separating the site from the Patterson High School property (Tr. 17). The stream, which is approximately 15 feet across (Tr. 35), flows northerly, then goes underground (Tr. 18). The Azrael-Landay site is sloped toward the east (Tr. 17), such that if there was any surface runoff, it would move toward the stream (Tr. 56).

The Azrael-Landay site is an unimproved piece of land (Tr. 163). When entered by State inspectors, the property had "no boundary or fence or anything" impeding access, and no sign or gate (Tr. 12; also Tr. 73-4). The site is readily entered by vehicle through a depression constructed into the street curbing from which a dirt access road leads onto the site (Tr. 12). According to Mr. Azrael, "we rarely visit our property and have no means of policing it" (Tr. 157).

State inspectors took samples from drums at the Azrael-Landay site, one of which was from a drum of liquid material which was uprooted in order to get into the top, and the others were of an ash-like material (Tr. 17). (The samples themselves are admitted as State's Exhibits 3 & 4, Samples GR251 and GR617, respectively). Analysis of the liquid sample, GR251, by the Water Resources Administration Laboratory indicated that the material contained 91.3% xylene (State's Exhibit 5); expert testimony at the hearing indicated that a material containing 91.3% xylene would have a flashpoint of less than 60° C (Tr. 125-

7), which is the regulatory standard for an ignitable hazardous waste, under COMAR 10.51.02.10. Analysis of the sludge sample, CR517, by the Water Resources Administration Laboratory indicated that a laboratory-induced extract from the sample contained 12 µg/l (parts per million) total chromium (State's Exhibit 5); because the laboratory-induced extract represents a 20-fold dilution of the material itself, the "total chromium of the sludge itself could possibly be as high as 240 parts per million" (Tr. 140).^{1/}

Two groundwater monitoring wells were installed at the Azrael-Landay site, downgradient from the drum-dump area (Tr. 74 & 82) and about 50-75 feet below the drums themselves (Tr. 82).^{2/} The wells were installed with Mr. Azrael's permission (Tr. 162). Samples obtained from the wells on September 27, 1982 (Tr. 86) and submitted to the DHMH laboratory as APW-1 and APW-2 showed the presence of the following volatile organics: chlorobenzene (ranging from 260 to 290 parts per billion (ppb)), vinyl chloride (ranging from 78 to 80 ppb), trichloroethene (42 ppb), and 1,2-dichloroethene (ranging from 258 to 300 ppb) (State's Exhibits 12 & 13).

Air monitoring was conducted at the Azrael-Landay property on September 23, 1982 and September 27, 1982, using an HNu meter, a device which measures the level of organic vapors in the air (Tr. 74-5). (Organic vapors are emitted by "volatile organics," which are compounds containing carbon which exhibit significant

^{1/}Although the laboratory's analysis for hexavalent chromium in Sample CR517 may be inaccurate due to the fact that the sample was improperly fixed with acid, the analytic error did not affect the laboratory's analysis for total chromium (Tr. 139).

^{2/}Many of the facts pertaining to the monitoring wells and the air monitoring at the site were proffered by Assistant Attorney General Lyko, in the interest of saving time at the hearing and by consent of the parties. Mr. Rich, Azrael's lawyer, indicated his agreement with this procedure and accepted the proffers (Tr. 79-80 & 86).

evaporation at room temperature and standard pressure (Tr. 90). There was no indication of any background organic vapors in the air near the perimeter of the site, but nearer to the center of the property, chest-level readings of 10-15 ppm organic vapors were recorded, with the ground-level readings being approximately 150 ppm, causing the inspector to leave the site due to the absence of protective clothing (Tr. 14).

There has been no hazardous waste permit and no discharge permit issued for the Ansaal-Landay property (Tr. 12).

ARGUMENT

I. The samples and air monitoring results obtained from the Ansaal-Landay property are admissible as evidence, because the Department's entries onto the site infringed no reasonable expectation of privacy.

A. The test for determining the validity of a warrantless search is whether the individual challenging the search can claim a reasonable or legitimate expectation of privacy in the object or area searched.

At one time the scope of Fourth Amendment protections was largely determined by concepts of property rights. However, since the Supreme Court's pronouncement in Katz v. United States, 389 U.S. 347, 351, 98 S.Ct. 507, 511, 19 L.Ed.2d 576 (1967), that the amendment protects people, not places," the reasonableness of a particular search and seizure has been measured by the legitimacy of an individual's expectation of privacy in the object or area searched.

[T]he application of the Fourth Amendment depends on whether the person invoking its protection can claim a "justifiable," a "reasonable," or a "legitimate expectation of privacy" that has been invaded by government action. (Citations omitted.) This inquiry, as Mr. Justice Harlan aptly noted in his Katz concurrence, normally embraces two discrete questions. The first is whether the

State of Maryland

DEPARTMENT OF ENVIRONMENTAL AND NATURAL RESOURCES
DEPARTMENT OF HEALTH AND GENERAL HYGIENE
BALTIMORE, MARYLAND 21202

CHIEF, BUREAU OF FOOD SAFETY

FOR OFFICE USE ONLY
U.S. MAIL PERMIT NO. 1001
BALTIMORE, MARYLAND

August 3, 1983

CERTIFIED MAIL

Mr. Edward Azrael,
Harrietta Azrael, and
Cele Landay
Azrael and Gann
1700 Maryland National Bank Building
Baltimore, Maryland 21202

Dear Mr. Azrael:

As a result of the recent investigations conducted at your Kane and Lombard
Streets property, the Waste Management Administration has determined that a situa-
tion exists which poses a public health and safety hazard. Therefore, the Waste Management
Administration has issued the enclosed Compliance Order.

Should you have any questions concerning this matter, please call
Mr. Paul G. Thompson, Regis. of Envtl. Enforcement, Bureau of Food Safety, 21202

Sincerely,

Ronald Wilson, Director
Waste Management Administration

RM:amg
Enclosure

- cc: James J. Lyko, Esquire
- Dr. John B. DeHoff
- William F. Clark, Esquire
- Mr. Fredric Sachs
- Mr. Arthur N. Caple
- Mr. Paul G. Thompson
- Mr. Paul Stancil

RECEIVED

AUG 4 1983

1504 SECTION

AR400330

IN THE MATTER OF:

SECRETARY OF HEALTH AND MENTAL HYGIENE

Mr. Edward Azrael,
Harietta Azrael and
Cele Landay

SERVE ON:

WASTE MANAGEMENT ADMINISTRATION
201 West Pr. St. Bldg.

Mr. Edward Azrael
Azrael and Sonn
1700 Maryland National
Bank Building
Baltimore, Maryland 21202

Baltimore, Maryland 21202
3-0-82-102

COMPLAINT AND ORDER

Whereas, the State of Maryland, Department of Health and Mental Hygiene Office of Environmental Programs, pursuant to the powers and duties vested in the Secretary of Health and Mental Hygiene by Health-Environmental Article, Sections 1-301 and 7-201 through 7-268, inclusive, and 9-301 through 9-344, inclusive, Annotated Code of Maryland, and delegated to the Director, Waste Management Administration, has reasonable grounds to believe that Edward Azrael, Harietta Azrael and Cele Landay have violated Maryland law regarding Controlled Hazardous Substances and Waste Pollution Control.

Whereas, on November 7, 1980, an abandoned dump located on your property at East Lombard Street and Mine Street, Ward 21, Section 17, BK 6333, Lot 21/25, Baltimore City, containing numerous drums of liquids, sludges and ashes was discovered by a representative of the Waste Management Administration.

Whereas, on November 12, 1980, samples were collected from drums exposed at the surface, and subsequent analysis detected the presence of Controlled Hazardous Substances, specifically spent non-halogenated solvents (Toluene and Xylene), and Controlled Hazardous Substances exhibiting the characteristics of E.P. Toxicity, specifically Hexavalent Chromium.

Whereas, on September 23, 1982, air monitoring at the dump site found evidence that organic vapors were being released from the site in sufficient quantities to pose a threat to human health and environment.

ARL:00331

Whereas, Edward Azrael, Harietta Azrael and Dale Landry have maintained a Controlled Hazardous Substance Facility without a facility PERMIT issued by the Office of Environmental Programs, in violation of Health-Environmental Article, Section 7-202(a) and of COMAR 10.61.07;

Whereas, said drums of Controlled Hazardous Substances are rusted, open and leaking and exist in a position likely to pollute surface and groundwaters of the State, in violation of Health-Environmental Article, Section 9-322, and of COMAR 10.60.01, Regulations .05A and .08B.

Therefore, it is ORDERED by the Director of the Waste Management Administration that Edward Azrael, Harietta Azrael and Dale Landry shall:

1. By September 30, 1983, remove all drums, ash, sludge and contaminated soils at the Kane and Lombard sites. This removal is to be accomplished under the direction of the Waste Management Administration, Enforcement Program, and done in such a manner that any and all presently or newly exposed hazardous waste is removed.
2. Within 15 days of receipt of this Order, construct a fence around the property in order to secure this property against unauthorized access.

This Order may be appealed, in accordance with the Administrative Procedure Act, Article 41, Section 244 et seq., and in accordance with Health-Environmental Article, Section 7-251(b) and 9-337(b), Annotated Code of Maryland, by filing a Request for Hearing within 10 days after receipt of this Order. Such a Request for Hearing, and its fee, should be sent to William F. Clark, Esquire, Acting Chief Hearing Officer, Department of Health and Mental Hygiene, 300 West Preston Street, Baltimore, Maryland 21201. If a hearing is requested, you will be notified in writing by the Hearing Officer as to the time and place of the hearing. Any such hearing will be held in the manner provided in the Administrative Procedure Act for hearings in contested cases.

AR400332

2/2/53

DATED 2/2/53

Approved as to form and legal
sufficiency this 2 day
of July, 1953

[Signature]
Rona E. Nelson, Director
Waste Management Administration

[Signature]
James C. [unclear]
Assistant Attorney General

0

ARL00333

APPENDIX D

POLREPS

AR400334

POLREP #1 - Kane & Lombard Streets Drum Site
Baltimore, MD
Potential Superfund Site

I. Situation (1600 hrs., March 6, 1984)

- A. MDWMA (Frank Henderson) contacted OSC 3/5/84 to request EPA action at this site.
- B. Site is located in the city of Baltimore and covers approximately one city block. MDWMA personnel have observed several hundred partially buried drums on the site and have obtained positive air readings using an HNU photo-ionization detector.
- C. Present property owner (Mr. Ed Asriel) has been uncooperative as to allowing site access, claiming dumping had occurred prior to his owning the property.
- D. MDWMA has attempted an administrative order to secure property owner cleanup. No results; order up 3/16/84.

II. Actions Taken

- A. OSC has reviewed available information which indicates the following situations may exist:
 - Direct contact threat. (Leaking, deteriorated drums and stained soil.)
 - Uncontrolled access.
 - Located within 200 yds. of a high school and within 300 yds. of a hospital.
 - Groundwater contamination--one well installed by MDWMA has been shown to be contaminated, with xyknes, toluene, chlorinated hydrocarbons.
- B. OSC has scheduled site assessment ASAP pending outcome of State enforcement activities, for week of 3/12. MDWMA to arrange minimal site security as an interim measure.
- C. OSC requested EPIC historical study to aid in determining total volume of disposed materials.

III. Future Plans

- A. OSC to perform windshield assessment with MDWMA personnel 3/8/84.

Robert E. Caron
Deputy OSC
U.S. EPA Region III

AR400535

POLREP #2

Potential Superfund Removal Site
Kane and Lombard Streets Drum Site,
Baltimore, Maryland

I. SITUATION (1600 hrs, 3/15/84)

- A. MDWMA (Mark Cox) contacted OSC this date to request direct EPA involvement in this site.
- B. State of Maryland efforts to obtain responsible party and property owner action has been UNSUCCESSFUL.
- C. Previous MDWMA request for EPA involvement was limited pending completion of State Enforcement efforts.
- D. EPIC has been contacted by OSC to arrange for Historical Imagery
- E. The State of Maryland has informed the OSC that this site is responsible for contamination of groundwater and presents a direct contact threat.
- F. Site is located adjacent to a hospital, high school and a wetlands area. Access is uncontrolled.

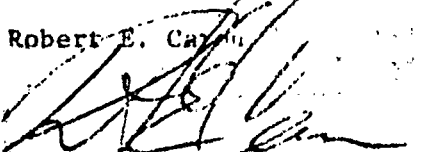
II. ACTIONS TAKEN:

- A. OSC has scheduled a complete site assessment for week of 3/19/84 to include review of available data and site visit sampling.
- B. OSC has briefed Regional Counsel (Kermit Rader), regarding site access concerns. Property owner has denied access to MDWMA previously.

III. FUTURE PLANS

- A. Site assessment scheduled 3/19/84
- B. OSC to identify property owner and any potential responsible parties and brief Regional Enforcement Personnel.

Robert E. Carlin


Deputy On-Scene Coordinator
U.S. EPA Region III
Philadelphia

AR400336

POLREP #3

Potential Super Fund Removal Project
Kane and Lombard Streets Drum Site
Baltimore Maryland

I. SITUATION (1600 hrs, 4/25/84)

- A. OSC performed windshield assessment and gathered all information from state files as regards this site.
- B. State of Maryland efforts to obtain responsible Part/Property owner action has been unsuccessful. The state has been denied access to the property.
- C. MDWMA site assessment of 9/82, involved drum sampling, installation of monitoring wells and well sampling. This sampling indicates the presence of volatile organics, suspected carcinogens and heavy metal in drums and ground water listed as follows:

<u>DRUM</u>	<u>GROUND WATER</u>
XYLENE-92 0/0	VINYL CHLORIDE-78 PPB
TOLUENE-3 0/0	CHLORO BENZENE-260 PPB
	DICHLORO ETHENE-300 PPB

These results prompted the issuance of a cleanup order to the property owner. The owner has legally appealed this order. MDWMA has been unsuccessful in enforcing this order.

- D. The OSC observed the following during off site survey:
Site 3 to 5 acres in size
Typical Landfill operation, residential, demolition trash
3 major areas of surface drum disposal-estimated 1,000 drums
site immediately adjacent to Patterson High School, School Fence has been breached in several areas. Students known to use site as access to school grounds.

Baltimore Memorial Hospital Approximately one quarter mile from site.

Past and recent history of fires on site involving drums and trash. The site is unsecured and allows for easy access. Residential trash dumping still occurs.

- E. This investigation and review of State Data, indicates an emergency situation does exist at this site due to:

Direct Contact
Possible fire and explosion threat

II. ACTIONS TAKEN:

- A. OSC briefed Enforcement Personnel and Regional Counsel regarding possible EPA cleanup order and site access concerns.
- B. Preparation of draft 10 Point Document in process.

ARL:00337

POLREP #3 (Cont'd)

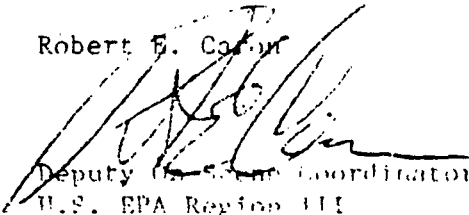
II. ACTIONS TAKEN:

- C. OSC contacted EPIC (Photography previously arranged) to check Status:

III. FUTURE PLANS

- A. OSC and Regional Counsel to contact property owner on 4/26/84 to request access to take samples.
- B. OSC feels more recent sampling is needed to verify the presence of HAZARDOUS WASTE. 10 Page Document will be submitted based on state data if access is denied. Analysis to be turned around in 48 hours.
- C. OSC to brief remedial personnel has regards long term site concerns.

Robert E. Cooney



Deputy Regional Coordinator
U.S. EPA Region III
Philadelphia, PA.

AR400338

POI,REP #4

Potential Superfund Removal Project
Kane and Lombard Streets Drum Site
Baltimore, Maryland

I. SITUATION (1600 hrs, 4/26/84)

- A. MDWMA (Frank Henerson) informed OSC this date that the State of Maryland is officially requesting an EPA Removal Action at this site.
- B. Enforcement Personnel and Region Counsel (Joe Donovan) received briefing from OSC as regards site conditions and property owner/responsible party issues.
- C. The OSC had determined that Emergency Sampling of drum contents will be necessary to confirm the presence of HAZARDOUS MATERIALS. MDWMA Data is two years old.

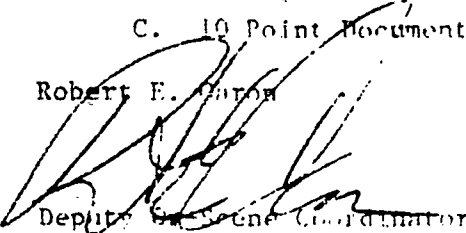
II. ACTIONS TAKEN:

- A. Draft 10 point document prepared.
- B. Regional Counsel (Joe Donovan), the OSC and Enforcement Personnel participated in a conference call with Mr. Warren Rich (X-State Attorney General's Office) Attorney for Mr. Edward Azrael, Property owner to request EPA access to property to collect drum samples on 4/27/84. Access was refused for 4/27, but Mr. Rich agreed to site Access/Sampling on Tuesday, May 1, 1984, when he can be present along with representatives of an engineering firm to collect split samples. Due to previous State Data the OCS believes sampling should occur ASAP and aggressive action is necessary to assess the potential emergency. The OCS compromised to secure voluntary access approval to allow for timely property access.

III. FUTURE PLANS

- A. Samples of six drums to be collected 5/1/84. TAT, OSC and Enforcement Personnel to be present. Analysis VIA Special Projects, 48-72 Hour Turn Around.
- B. 14 Day "DUAL TRACK" Enforcement Branch Policy Potential for "ORDER" initiated. Enforcement Personnel to assess the need for an order ASAP.
- C. 10 Point Document to be submitted pending sampling results.

Robert E. Dixon


Deputy Site Remediation Coordinator
U.S. EPA Region III
Philadelphia, PA.

ARI:00339

POLREP #5

Potential Superfund Removal Site
Kane and Lombard Streets Drum Site
Baltimore, Maryland

I. SITUATION (1600 hrs, 5/1/84)

- A. OSC, TAT, MDWMA performed on-site assessment of this property escorted by legal attorney representing the property owner.
- B. OSC convened meeting with enforcement (Galina Bendersky) and Regional Counsel (Kermit Rader). Due to the results of state enforcement efforts, the property owner's legal position and the property owner's financial status, no order will be issued. A strong cost recovery action will be initiated if Cercla funds are used.
- C. The following observations were noted during the assessment:
 - Approx. 1,000 drums, rusted, bulging, some leaking and spilling. Many empty drums.
 - Evidence of extensive drum burial.
 - Areas devoid of vegetation.
 - Adjacent high school students use property as access to school yard.
 - Recent evidence of fire on site.
 - State investigator reported explosions during fire.
 - History of underground fires involving fill materials.
 - Evidence of hospital type waste.
- D. Air readings on site were negative, however there were 40 MPH winds. Readings taken inside several drums were in excess of 2,000 PPM (HNI). Explosive atmospheres were detected in two of six drums opened.

II. ACTIONS TAKEN

- A. Six on-site drums were opened during the assessment. Four drums (three liquids one solid) were sampled. Split samples were given to the accompanying attorney.
- B. All site activities, air readings, sample locations were logged and photographed.
- C. Draft ten point document prepared.
- D. State investigating recent fires.
- E. State investigating possible ground water use in the area.

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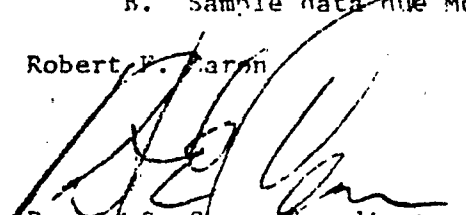
POLREP #5 (CONT)

III. FUTURE PLANS

A. Ten point document draft prepared, OSC considering submitting document for R.A. approval based on fire and explosion threat. Decision pending state investigation of recent fire.

B. Sample data due Monday 5-7-84 special projects analysis.

Robert P. Aaron



Deputy On-Scene Coordinator
U.A. EPA Region III
Philadelphia

AR400341

POLREP #6

CERCLA Immediate Removal Project
Kane and Lombard Streets Drum Site
Baltimore, Maryland

I. SITUATION (1630 hrs, 5/2/84)

- A. OSC submitted Immediate Removal Action Memorandum (formerly 10 point document) for RA approval 5/2/84. Field observations, state sample data indicate that a direct contact threat and fire an explosion threat exists at this point.
- B. State of Maryland has concurred with Immediate Removal.
- C. Verbal, preliminary results from samples collected during OSC site assesment 5/1/84 indicate the presence of volatile organics (Toluene, ethyl benzene) in drums on site. One drum yielded a flash point of less than 70°F.

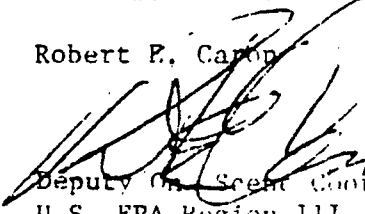
II. ACTIONS TAKEN:

- A. OSC Consulting with Regional Counsel as regards legal concerns.
- B. OSC requested MDWMA provide personnel on scene and support for community relations. MDWMA (Ron Nelson) will provide a State On-Scene Coordinator, Project manager and Community relations Support, when funding received.
- C. OSC provided Legal Counsel (R. Truitt) attorney for the property owner, in formation as regards RCRA and Priority Pollutant Analysis under EPA protocols.

III. FUTURE PLANS

- A. OSC awaiting RA approval of Immediate Removal Funding Request.
- B. MDWMA to arrange limited site security, (i.e. Police patrols) during interim.
- C. OSC to activate ERT for on site support
- D. OSC to activate VSCG/AST for on site support.

Robert E. Cannon


Deputy On-Scene Coordinator
U.S. EPA Region III
Philadelphia, PA.

AR400342

POLREP 7

CERCLA Immediate Removal Project.
Kane and Lombard Streets Drum Site
Baltimore, Maryland

I. Situation (1700 hrs., 5/3/84)

A. OSC recieved RA approval to undertake an Immediate Removal Action at this site.

B. OSC action memorandum calls for a 4 phase project as follows:

Phase I - Site Security(fencing)
Phase II - Measuring and Sampling
Phase III - Surface Drum overpack, stage, sample,
transport and dispose
Phase IV - Site Restoration

C. Estimated costs for this project is as follows:

Phase I - 30K
Phase II - 70K
Phase III - 500K
Phase IV - 50K
TAT - USCG/AST - 25K
ERT/IT - 20K
Intramural - 15K

TOTAL - 710K

II. Actions Taken

A. OSC issued verbal "notice" to property owner at 1600 hrs., this date. Property owner will respond 5/4/84 after consultation with his legal counsel.(Warren Rich).

B. OSC activated ERT.

C. OSC activated USCG/AST.

D. MDWMA (Ron Nelson) requests no on-site work until Monday, 5/7/84, in order to allow for proper notification to City and State personnel and to allow for planning of community relations due to nearby sensitive populations(school, hospital).

III. Future Plans

A. OSC intends to activate ERCS and respond on-scene Monday, 5/7/84.

B. Regional Public Affairs (Hal Yates) coordinating a press conference and public meeting with MDWMA, Linda Smeyne, planned for Monday, 5/7/84.

C. OSC awaiting response from property owner. Written notice letter drafted, upon advice of Regional Counsel (Kermit Rader).

ARR:00643

POLREP #8

Superfund Removal Site
Kane and Lombard Streets Drum Site
Baltimore, Maryland

I. SITUATION (1700 hrs., 5/4/84)

- A. OSC received response to oral "notice" to property owner from Owner's legal attorney (Warren Rich). Property Owner will take no action and claims that a third party disposed of these drums on his property without his knowledge. Kermit Rader (Regional Counsel) witnessed this, response and requested and received property owner cooperation for further investigation. Property owner has agreed to allow EPA access to perform an Immediate Removal as per Polrep 7.
- B. MDWMA providing limited site security for weekend.
- C. MDWMA to provide on-scene and community relations support.
- D. Regional Public Affairs Coordinating Press Conference and Public Meeting with MDWMA.
- E. ERT to provide on site technical support to the OSC.

II. ACTIONS TAKEN:

- A. OSC contacted ERCS Project Manager (Walt Youngblade) at 1420 hrs, this date and issued verbal delivery order to be followed by a written Delivery Order, requesting a response Manager and Clerk to respond 0800 hrs, 5/7/84, to consult with OSC and develop an appropriate written Delivery Order.
- B. OSC contacted ERT, TAT, and USCG/AST to request their presence on-scene 0800 hrs, 5/7/84.

III. FUTURE PLANS:

- A. Mobilization of personnel and equipment to begin 5/7/84.
- B. Press conference to be held at MDWMA offices in Baltimore at 1000 hrs, 5/7/84.
- C. OSC and MDWMA to meet with City Managers 5/7/84.
- D. CDC to be on-scene 5/8/84 to meet with hospital and high school officials.
- E. MDWMA to contact and brief high school and hospital officials 0900, 5/7/84.
- F. OSC to hold Strategy meeting on-scene 5/7/84 with all involved personnel.

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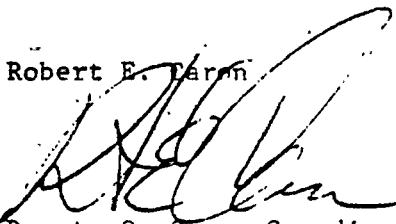
POLREP #8 (CONT)

G. MDWMA to develop Emergency Action Plan.

H. ERT and TAT to develop Site Safety and Air Monitoring Plan.

I. ERT to develop Site Action Plan.

Robert E. Laron



Deputy On-Scene Coordinator
U.A. EPA Region III
Philadelphia

Frank Henderson

State On-Scene Coordinator
Md. OEP WMA
Baltimore, Maryland

AR403345

POLREP #9 CERCLA IMMEDIATE REMOVAL PROJECT
KANE AND LOMBARD DRUM SITE, BALTIMORE, MD.

I. SITUATION

- A. OSC issued delivery order to ERCS contractor. Intense mobilization to commence 5/8/84 including installation of command post, decon trailer, utilities and other related amenities.
- B. Press interest very high. Three (3) T.V. stations and several press offices on-site to prepare photo/video documentation.
- C. OSC conducted a prepress conference meeting at 0900 hrs. State and City officials along with community people were present at this meeting. Subsequently, a press conference was held at 1030 hrs. Personnel present at the press conference included the OSC, State officials (Mark Cox, Frank Henderson, Mike Griffen, John Koontz and Linda Smeyne), City Officials (William Codd, John McMahon) and Congress elected officials (Congresswoman Milkowski). The press affairs were coordinated through EPA Public Affairs rep. (Hal Yates) on-site.
- D. A public meeting was conducted at 1900 hrs, this date at Patterson High School. Press interest and public interest very high. In spite of short notice and the inclement weather 250 local populace attended the meeting.
- E. MDWMA through its public affairs officials distributed by a door-to-door method of approx. 2000 fliers to neighboring residents to advise them of public meeting.
- F. 24 hr site security implemented tonight. Night security being provided by Baltimore City Fire Prevention Bureau. Persons are specialist in Hazardous Waste fire protection.
- G. OSC has tasked technical personnel (CERT, TAT, ERCS) with work/action plan to remove surface drums. OSC concerned over nearby sensitive populations. Several options are being considered:
- Limiting removal operations until nearby schools have completed this term.
 - Removal operations during off hours.
 - Complete full scale surface drum removal with complete offsite monitoring in place.
- H. TAT to investigate nearby ballfields as regards to potential for contamination to address citizen concerns.
- I. 5/7/84 personnel on scene:
- | | |
|-----------|----------|
| 1 - EPA | 1 - ERT |
| 1 - MDWMA | 3 - TAT |
| 3 - USCG | 3 - ERCS |
- J. OSC requests USCG/AST as designated site safety officer and provide personnel for cost documentation.

AR400546

II. ACTIONS TAKEN

- A. At 1330 hrs, this date, OSC contacted U.S. Coast Guard Marine Safety Office (Executive Officer) and briefed him on EPA's operation at the site.
- B. OSC had meeting with school and hospital officials at 1500 hrs at Patterson High School. Also present at this meeting were, Sister Magdalita and Ms. Graml of Our Lady of Fatina, State Officials, TAT, EPA Public Affair representative (Hal Yates) and Channel 11 Action News.
- C. OSC advised Director of City Hospitals (Ron Peterson) about proposed site action.
- D. OSC briefed Superintendent of Schools about site plans. OSC also requested the Superintendent to advise students to keep off the site.
- E. MDWMA and Baltimore City Officials established a "Rumor Control to test line" (396-1188) to provide up to date information regarding site to the local populace.
- F. MDWMA provided the states' an monitoring lab on site a 1330 hrv to provide real time air monitoring capability. A sampling run made this date indicated no evident vapor contamination off-site from the hazardous waste on-site.
- G. OSC conducted meeting at 1500 hrs. At the MDWMA field office to develop site operation and monitoring strategies. Present at the meeting were:
 - OSC (Bob Caron)
 - MDWMA (Ron Nelson, Mark Cox)
 - ERT (Bob Cibulskis)
 - USCG/AST (Lt. Phil Glenn, Jerry Montgomery)
 - TATs
 - Prime Contractor

III. FUTURE PLANS

- A. CDC and State Health to be on site 5/8/84 to address health related concerns.
- B. OSC to attend an 5/14/84 faculty meeting at Patterson High School, as per Superintendents request.
- C. A surveyor to be on-site 5/8/84 to delineate property lines so that location of the fence line is properly constructed.
- D. ERT and TAT to prepare comprehensive air sampling program protocol, as directed by OSC.
- E. OSC intends to contact with the City of Baltimore to provide security on scene. **Baltimore City Health Department to provide one person on scene on a regular basis to observe site activities and advise as needed.**

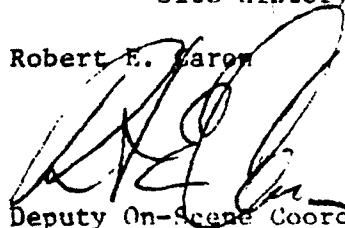
POLREP #9

F. OSC intends to contract with the State of Maryland to provide:

- On Scene Analytical Support (MOBILE Air Lab)
- Equipment trailer
- Analytical Support (off site)

G. Meeting to be held on-scene 5/9/84 with community leaders to discuss site history.

Robert E. Laron


Deputy On-Scene Coordinator
U.S. EPA Region III
Philadelphia

Frank Henderson

State On-Scene Coordinator
Md. OEP WMA
Baltimore, Maryland

AR600348

POLREP #10

Superfund Removal Site
Kane and Lombard Streets Drum Site
Baltimore, Maryland

I. SITUATION (2300 hrs, 5/8/85)

- A. Discussion with USCG/MSO (Captain Carlton) indicated that site location is in USCG jurisdiction. USCG-OSC in favor of present EPA actions and maintaining lead on project.
- B. Press continues to exhibit strong interest again today. Media on site:
News Scene 2
Action News 11
Channel 13
News 45
Baltimore Sun (Morning and Evening additions)
- C. 0830 hrs, 5/8/84, Congresswoman, Barbara Mikulski, on site to express to OSC her support for the success of this removal.
- D. This date, personnel on scene:
1 - EPA 3 - USCG/AST 7 - ERCS & Subcontractors
2 - MDWMA 3 - CDC
1 - ERT 3 - TAT
- E. CDC (Kent Gray, Bucky Walters, Dr. Eric Sompson) on site, 1530, 5/8/84, to provide OSC with scientific support.
- F. 1330 hrs, this date, surveyor on site to shoot line along west boundary of drum site. Upon surveying of property line on west boundary of site, by City of Baltimore, Dept. Public Works, it became apparent that the property line runs approximately 10' off of west boundary of drum site. Roadway Express is the property owner on other side of property line - OSC to advise.
- G. OSC prioritizes the installation of the fence to be the area of highest attention.
- H. State Air Monitoring lab on site establishing background of site as part of Air Monitoring program.
- I. OSC reached agreement between EPA and ERCS that ERT and TAT be involved in the designation of drums to be sampled by contractor as directed by OSC.

II. ACTIONS TAKEN

- A. This date, support area excavated, command post installed completed with utilities. Command post phone numbers are (301) 633-9193. During excavation and laying of gravel (due to muddy conditions) storage tank revealed (approx. 550 gallons). TAT and USCG made site entry to identify potential release. None was noted.

ARL00349

POLREP #10

- B. 1300 hrs, this date, OSC, ERT and ERCS made site entry to identify future actions.
- C. 1100 hrs, this date, obtained soil samples from base ballfield immediately adjacent to site. Six (6) samples taken, with 2 taken at the 2 breeches in fence which borders the site.
- D. OSC met with Baltimore City Department of Parks and Recreation and discussed potential limited access to baseball fields adjacent to site.
- E. ERT, TAT prepared extensive air monitoring program, as directed by OSC, Monitoring program to consist of:
 - Continuous real time perimeter air monitoring at established stations using HVU/OUA.
 - Regular air monitoring on site and offsite using personnel pumps with appropriate sampling media.
 - Most analytical work proposed to be performed on site by State Air Monitoring Lab.
- F. 1630 hrs., this date, 2000 ft. of 8 feet high fence delivered to site. Today holes have begun to be bored for the fence posts.
- G. OSC decided to mobilize ERCS' grappler to remove drums.
- H. 1500 hrs., this date, OSC held meeting to proceed with contractual arrangements with the State of Maryland and the City of Baltimore. Cost breakdowns to follow in future Polrep.

III. FUTURE PLANS

- A. OSC to lead walk-thru of site 1200 hrs., 5/9/84. Those planning to attend include officials from state, city, local offices along with Congresswoman Mikulski.
- B. USCG/AST to provide 3 air pumps to assist air monitoring program. Pumps to arrive 5/9/84.
- C. ERT and TAT to prepare an extensive Measuring and Sampling Plan.
- D. Air monitoring program to be implemented 5/9/84, as weather conditions permit.
- E. USCC Commanding Officer, Mr. Carlton to be on site to get better understanding of site activities and concerns and offer any advisements as appropriate.
- F. OSC has been notified that EPA contracts personnel (Pat Flynn) to be on site. Date of arrival is expected to be 5/11/84.

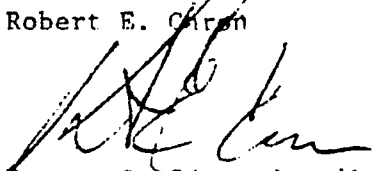
AR400350

POLREP #10

- G. Inspector General to be on site at some unknown future date.
- H. OSC to contact remedial regarding site consideration for NPL.
- I. 5/9/84, CDC officials to meet with Director of Baltimore City Hospitals (Ron Peterson) to discuss health related concerns that are applicable to site. State Health representative (Ellen Coe) to be present.
- J. CDC, in conjunction with Jim Henry (Capt. Baltimore City Fire Prevention Bureau) to prepare action plan. OSC will not begin drum removal until receipt of plan.

Robert E. Ciron

Frank Henderson


Deputy On-Scene Coordinator
U.S. EPA Region III
Philadelphia

State On-Scene Coordinator
Md. OEP WMA
Baltimore, Maryland

ARL53351

POLREP #11

Superfund Removal Site
Kane and Lombard Streets Drum Site
Baltimore, Maryland

I. SITUATION (2300 hrs., 5/9/84)

- A. 1200 hrs., this date, OSC conducted site tour for concerned individuals. Those attending are:
- Reps from office Barbara Mikulski (Congresswoman)
 - 2 Bayview area citizens
 - Baltimore Police
 - Many Concerned local citizens
 - CDC of Baltimore City
 - State Officials
 - USCG
 - Channel 11 Action News
 - Baltimore Sun Newspaper
 - Many Concerned local citizens
 - Baltimore City Parks & Recreations
 - Channel 31 (WJZ-TV)
- B. OSC unable to secure power on scene due to high financial charges identified to implement power, OSC decided to implement generator. Generator expected 5/10/84.
- C. As there is no electric, state continuing to run their generator as power supply for state and EPA command posts.
- D. OSC plans not to write contract with city. Therefore, no costs will be incurred from city at this project.
- E. Air Monitoring program temporarily delayed due to backpressure exerted on pumps from triple stage tubes. Tubes were recommended by state. OSC directed TAT to contact state and investigate options to use these triple stage tubes. Currently, to implement an air monitoring program, other collection tubes suitable for, pumps, will be installed. OSC concerned about timely implementation of air monitoring program. TAT to expedite.
- F. COB, 5/10/84, estimated costs to date: Current project ceiling:
\$710,000 extramural

<u>CONTRACTOR</u>	<u>COSTS</u>	<u>CEILING</u>
ERCS	25,000.00	250K
STATE	2,200.00	50K
USCG and TAT	5,500.00	25K
TOTAL	32,700.00	345K

AR400852

POLREP #11 (CONT)

- G. Decontamination zone established. OSC, USCG (SSO) and CDC concur on location. Air monitoring on-going at decon.
- H. 1500 hrs., 5/9/84, Dr. Eric Sompson & Mr. Kent Gray of CDC departed site for Atlanta, GA.
- I. This date, personnel on scene:

1 - EPA/OSC	1 - City
1 - EPA/ERT	9 - Press personnel (3 agencies)
4 - State	3 - TAT
2 - USCG	11 - ERCS
3 - CDC	

II. ACTIONS TAKEN

- A. OSC directed ERCS to have fence installed within 3-5 days. (5/11/84-5/13/84). ERCS main priority today as directed by OSC is to make progress in installing fence around site.
- B. CDC met with Deputy Director of Baltimore City Hospital to advise of current situation of site, hazardous substances to be handled during removal to offer diagnostic consultation in the event of a human health exposure situation.
- C. CDC met with State Health Department (Ellen Coe) and other representatives to discuss site & public health issues and discuss coordination between Fed., State and City Health Department. In addition, Ms. Coe was advised that local hospital has been contacted.
- D. 0700 hrs. this date, USCG/SSO reviewed site safety plan with all on site personnel.
- E. CDC met with Dr. Susan Guarniere, Commissioner of Health, Balto. Health Dept. to discuss public health concerns & other health related issues. Dr. Guarniere agreed to be the "spokeperson for health". In this role, she will be the communicator for the various health agencies at public meetings and in dealings with the press.
- F. Backy Walters, CDC, contacted Dr. Eisenberg Director of Science & Env. Health, Md Dept. of Health & Mental Hygiene to advise of CDC activities on site.
- G. CDC in conjunction with ERT developed and disseminated action level plan which will become part of Baltimore F.D. Evacuation Plan,
- H. 5/8/85 CDC reviewed site safety plan and recommended backup warnings on heavy machinery on site. Also, recommended heat stress contingencies be implemented.

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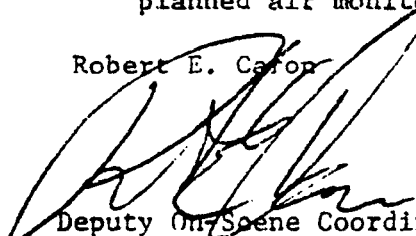
POLREP #11 (CONT)

- I. As per CDC advice, OSC decided to have person equipped with air monitoring equipment to monitor air as baseball games occur.

III. FUTURE PLANS


- A. Results of soil samples taken from baseball fields immediately adjacent to East Side of site expected first thing tomorrow.
- B. OSC to advise Department of Parks and Recreation upon receipt of sample results from baseball fields.
- C. Coordination planned with State Air Monitoring lab will occur to obtain proper equipment for implementation of original air monitoring program as initially agreed upon by EPA, ERT, State and TAT.
- D. EPA contracts personnel (Pay Flynn) expected on site, 5/10/84, to offer guidance to OSC on contractual arrangements.
- E. IG expected on site . to offer guidance to OSC regarding site documentation.
- F. Captain Carlton (USCG/MSO) expected on site Friday, 5/11/84, to tour site with OSC.
- G. OSC to make decision regarding equipment necessary to implement originally planned air monitoring program.

Robert E. Caron



Deputy On-Scene Coordinator
U.S. EPA Region III
Philadelphia

Alex M. Cox



State Project Manager
Md - DHMH - OEP - WMA
Baltimore, Maryland

AR400354

Superfund Removal Site
Kane and Lombard Streets Drum Site
Baltimore, Maryland

I. SITUATION (2300 hrs., 5/10/84)

A. This date, personnel on scene:

- 1 - EPA/OSC 1 - CDC
- 1 - ERA/ERT 2- City
- 2 - USCG 2 - TAT
- 3 - State 12 - ERCS & 5 Subs

B. To date, approximately 50% of the fence installation is complete. No drums have been removed or staged.

C. Results received from lab on samples taken by TAT from baseball fields adjacent to east side of site. Based on these results and data from air monitoring, OSC deemed it safe for activities to continue on fields.

D. Baltimore City has completed and implemented Emergency Action Plan.

E. Press interest continues to be high. Agencies on scene today:
WBAL TV - 11
Action News
News Scene 2
Monday, 5/7/84, news release was heard on National Public Radio in Washington, DC

F. 1700 hrs., this date, CDC (Bucky Walters) and ERT (Bob Cibulakis) depart site. Both will be available should OSC need their services.

G. COB, 5/10/84, estimated extramual cost to date:

Project Ceiling : 710K

<u>CONTRACTOR</u>	<u>COSTS</u>	<u>CEILING</u>
ERCS -EXT	33K	250K
STATE -EXT	4K	50K
USCG-TAT-EXT	7.6K	25K

H. 1200 hrs., this date, generator arrived on site and has been implemented to command posts as power supply.

I. OSC being challenged by field Director (Lou Karpouzie) to softball game. Preparations are being made.

J. City on scene documenting site operations and offering assistance to OSC.

K. Baltimore city has elected not to enter into a contract with MPA to provide security on scene. RRT rep.(Jim Henry) extremely concerned over this issue. Osc advised RRT chairman and State of this situation. Eros to provide site security.

AR400555

II. ACTIONS TAKEN

- A. OSC stresses importance of maintaining continuous air monitoring program as drum removal commences. Air monitoring program implemented today (baseline data gathered).
- B. Today, ERCS Excavating staging area, and cell to be used to store empty and crushed drums.
- C. Jim Maxwell, Baltimore City Health Department offered services to OSC to construct timetable of site activities since approximately 1955.
- D. State Air Monitoring Lab preparing to analyze air sampling tubes as per air monitoring program. Their analyzing unit must be adjusted to analyze current sampling tubes.
- E. USCG/SSO continues to monitor site activities to assure proper safety measures are attained. Safety stressed as drum removal begins 5/11/84.
- F. MDWMA personnel working in conjunction with TAT during air monitoring program. MDWMA assisting TAT in placing pumps and other program related activities.
- G. MDWMA installed weather station on site, 1600 hrs., 5/10/84.
- H. 1100hrs., 5/10/84, a particular press agency attempted unauthorized access to site. OSC advised SSO to be aware of situation.
- I. OSC decided large air bottle will be placed and ready for hook-up at bottle change area. This is to be available to personnel needing bottle change who are believed to have been splashed with on site material.

III. FUTURE PLANS

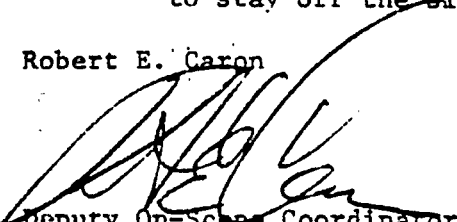
- A. Fence installation expected to be complete by 5/13/84.
- B. Drum removal to commence tomorrow, 5/11/84.
- C. OSC to request State air monitoring lab to perform a quality control analysis on an EPA known tube.
- D. ERT (Bob Cibulski) to prepare measuring and sampling plan (extent of contamination). Preliminary plan expected next week.
- E. ERCS to obtain lab that can analyze air sampling tubes. This lab may be source of site needed materials necessary for air sampling program.
- F. EPA contracts personnel (Pat Flynn) expected on site 5/11/84 to offer guidance to OSC regarding site documentation and records.
- G. IG expected on site at some unknown future date to offer guidance to OSC regarding site documentation and records.

AR400556

POLREP #12 (CONT)

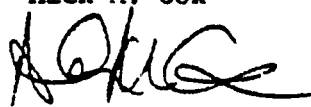
- H. USCG/MSO to be on site 5/11/84 to meet with OSC and offer any guidance possible.
- I. MDWMA to meet Monday 14 May at Patterson Park High School for a 1500 hrs faculty meeting to discuss the site and requesting students to stay off the site.

Robert E. Caron



Deputy On-Scene Coordinator
U.S. EPA Region III
Philadelphia

Alex M. Cox



Md.-OEP-WMA
State Project Manager
Baltimore, Md.

AR400357

POLREP #13

Kane and Lombard Streets Drum Site
CERCLA Immediate Removal Project
Baltimore, Maryland

I. SITUATION (2300 hrs., 5/11/84)

- A. OSC informed by TAT DPO (T. Massey) that only two TAT will be available to the OSC for the duration of the project. OSC extremely concerned at the acute shortage of primary support personnel (5 USCG/AST & TAT) for documentation, cost control, technical assistance and contractor monitoring. Only 2 AST & 2 TAT personnel on site at this time with no possibility of getting additional manpower. Already, photographic and video documentation has dropped to a minimum at the site. Also, ERCS is performing the option study for disposal of wastes since TATs are unable to provide this assistance to the OSC.
- B. Present functional activities of the support personnel are as follows:
USCG/AST (2 personnel) documentation, cost control and site safety
TAT - air monitoring program, sampling & measuring program, documentation, technical assistance and hystical support activities.
- C. OSC concerned over lack of available resources to properly document and monitor site operations. Additional TAT, State and USCG/AST resources are unavailable due to other regional and program committments. Efforts will continue to properly document and log all on scene activities as best as possible.
- D. This date, personnel on scene:
- | | |
|-----------------------|---------------------------------------|
| 1 - EPA/OSC | 1 - Balto City Fire Prevention Bureau |
| 6 - State | 2 - TAT |
| 2 - USCG | 12 - ERCS& 8 subcontractor persons |
| 2 - City Health Dept. | 6 - Press personnel (3 media) |
- E. Director MDWMA (Ron Nelson) on scene 1400 hrs., this date to obtain visual update of site from OSC and to offer comments.
- F. Press interest today continues to be high. Agencies on scene: News Scene 2, WBAL News Radio and TV 11 Action News.
- G. Excavation staging area and cells complete. 3 cells excavated. One will be for drums with solids, one for liquids and the other for empty drums.
- H. 1535 hrs., this date, drum removal commencing. Approximately 6 empty drums removed and placed in appropriate cell. During operations, TAT observed absence of on-site air monitoring as directed by OSC to ERCS.
- I. 1030 hrs., EPA contracts personnel on site (10) to offer guidance to OSC concerning ERCS.

ARL00358

POLREP #13 (CONT)

- J. 1800 hrs., this date, baseline results of 2 of the 9 air sampling tubes received from state air lab on site.
- K. Bob Olnick (ERCS project manager) on site this date to offer OSC assistance concerning ERCS contract.
- L. ERCS providing lab to perform analysis on carbon air sampling.
- M. Fence installation today approximately 50% complete. Operations expected to be complete 5/13/84.
- N. COB, 5/11/84, estimated extramural cost to date:

<u>CONTRACTOR</u>	<u>COST</u>	<u>CELLING</u>
ERCS	50K	250K
State	5K	50K
USCG & TAT	9K	25K
Totals	64K	325K

- O. 1500 hrs., this date, Ellen Coe (City Health Dept.) contacted OSC on behalf of Bob Stangberry (Eastwick Youth Assoc.). He stated to Ms. Coe that he will not allow further baseball activities to occur without reliable data, identifying Joseph Lee Park (behind high school) fields as safe.

II. ACTIONS TAKEN

- A. OSC toured site with EPA contracts persons. OSC offered to lead persons on site if they wished so.
- B. Mobile State Air Monitoring Lab performed air sampling at nearby Patterson High School.
- C. OSC pursuing options for getting addition support manpower through the state and ERCS. However, the OSC is concerned that through additional "bodies" can be procured the appropriate training and experience needed for the support activities may not be available. This concern obviously creates issues of efficiency, cost effectiveness, work quality, and safety liabilities for the OSC.
- D. State Air Lab performing analysis of 9 tenex air sampling tubes.
- E. OSC investigating in site area.
- F. CDC and SSO advised OSC of potential heat stress related problems. Amendments to SSP being drafted to include additional safety requirements. OSC staff investigating the availability for EMT for on site medical monitoring.
- G. Air monitoring continuing. Presently, 4 perimeter scans daily by MDWMA with pumps implemented daily by TAT.

AR60059

FEDERAL ON-SCENE COORDINATOR'S REPORT

KANE AND LOMBARD STREETS DRUM SITE
BALTIMORE, MARYLAND

CERCLA IMMEDIATE REMOVAL PROJECT
MAY 7, 1984 TO JUNE 8, 1984

AR400360

- II. OSC requested MDWMA TO OBTAIN SAMPLES from Joseph Lee Park fields with quickest lab turnaround on results.
- I. 1700 hrs., this date, Carbon Air sampling tubes given to OH Materials lab for analysis according to EPCAM No. 127.
- J. OSC directed as ERCS responsibility to provide on site air monitoring in drum removal area during operations.
- K. 1800 hrs., this date, 2 of 9 baseline results from samples taken this morning. Interpretation and remaining results expected 5/12/84.
- L. USCG/AST (SSO) advises OSC that all on site activities, during drum removal operations, be performed in Level B. Perimeter air monitors to carry respirator during all activities.
- M. OSC decided that any other sites not related to Kane-Lombard Streets Drum Site be referred to MDWMA.

III. FUTURE PLANS

- A. Sunday, 5/13/84, OSC (Bob Caron) to leave site until Friday nite, 5/18/84. Steve Jarvela, OSC - Region III, Federal On-Scene-Coordinator in his absence.
- B. Faculty meeting scheduled for 1500 hrs, 5/14/84, at Patterson High School. EPA/OSC to attend.
- C. Due to adverse ground conditions on site (muddy) OSC authorized purchase of construction matting for ERCS to lay on ground to support heavy equipment. Cost for 12-20 feet sections is approximately \$3400. OSC understands that this cost is reasonable and justified.
- D. IG expected on site at some unknown date to offer guidance to OSC concerning site documentation and records.
- E. MDWMA to advise Bob Stansberry of results of samples from Joseph Lee Park.
- F. TAT personnel to increase to 3 over weekend. On Monday 2 TATs to perform previously listed tasks. OSC anticipates "2 dead" TATs by Thursday.

Robert E. Caron

Mark Cox

Deputy On-Scene Coordinator
U.S. EPA Region III
Philadelphia

MD-OEP-WMA
State Project Manager
Baltimore, MD

AR400361

Kane and Lombard Streets Drum Site
CERCLA Immediate Removal Project
Baltimore, Maryland

I. SITUATION (2300 hrs., 5/12/84)

A. Personnel on scene, this date:

- 1 - EPA/OSC
- 2 - USCG
- 3 - State
- 3 - TAT
- 1 - City
- 12 - ERCS & 3 Subcontractors

B. Press interest beginning to decrease over weekend. Channel 11 - Action News attempted interview with OSC via telephone conversation.

C. 0930 hrs., rain began to fall on site only slightly hampering excavation activities. Rain ended 1300 hrs. During this period no air monitoring was conducted.

D. No drums removed today. Total drums removal to date is approximately 6. All staged in "empty drum" cell on site.

E. 1130 hrs., OSC was alerted by SSO of man practicing archery near decon (west side of site). This threatened the safety of on site personnel.

F. COB, this date, estimated extramural cost:

<u>CONTRACTOR</u>	<u>COST</u>	<u>CEILING</u>
ERCS	62K	250K
State	7K	50K
<u>USCG & TAT</u>	<u>10.5K</u>	<u>25K</u>
Total	79,5K	325K

G. OSC efficiently using personnel on site. Due to lack of TAT manpower, state to lead perimeter air monitoring program with TAT adding technical support.

H. Despite lack of TAT resources, TAT performed 11 SPCC inspections in the last two days in the Baltimore Area.

II. ACTIONS TAKEN

A. Highland Fence Co. (subcontractor to ERCS) installed gate at support area. Fencing operations approximately 70% complete. No fence work will be done on Sunday.

B. SSO related site concerns to individual practicing archery. Individual was cooperative and moved to alternative location due to personnel hazards.

POLREP #14 (CONT)

- C. State mobile air lab analyzed 6 tubes (4 today). Results being interpreted. OSC expects results of all 9 baseline samples by 1200 hrs., 5/13/84, from lab.
- D. TAT developed Measuring and Sampling Plan, as per request OSC. Plan identifies the sampling of 24-26 soil samples, 5 water samples and 10 drum samples. All samples are anticipated to be representative of site in an effort to establish extent of contamination.
- E. Due to poorly drained soils encountered on scene heavy equipment (Dozers etc.) became stuck on several occasions. ERCS Contractor instructed to pursue all alternatives to stabilize site and drum access roads. Trees originally felled on site being used to stabilize road. In addition 8, 20' sections of construction matting has been purchased. Estimated cost \$3400. This matting is portable and can be moved to other locations as necessary. Today's efforts on scene have been based on site/drum access improvement to enable access by equipment. ERCS response manager estimates that approximately 300 drums/day can be moved after access improvement.

III. FUTURE PLANS

- A. As per Measuring and Sampling Plan, ERCS tentatively to supply the following:
 - 2 persons to sample (under direction OSC/TAT)
 - all necessary glassware and equipment for sampling TAT to be responsible for implementing plan, any necessary paperwork to obtain lab for analysis.
 - Expected duration of sampling is approximately 2 1/2 dys.
- B. Drum removal activities to recommence 5/13/84. OSC anticipates this phase of operation to be performed daily as weather conditions (as per National Weather Service) appear favorable thru Monday, 5/14/84.
- C. Continuous air monitoring to be implemented as drum removal activities exist. (Persons monitoring reminded to be continuously conscious of wind change.) Continuous downwind monitoring will exist as drums are removed.
- D. COB, 5/13/84, 1 TAT to depart site to perform SPCC inspections as per request DPO. 2 TAT's will be on site to perform requested services.
- E. Steve Jarvela (OSC-Region III) to replace present OSC (Bob Caron) as Mr. Caron needs to attend a mandatory, OSC class. Mr. Jarvela expected on site Sunday 5/13/84.

Robert E. Caron

Alex M. Cox

Deputy On-Scene Coordinator
U.S. EPA Region III
Philadelphia

MD-OEP-WMA
State Project Manager
Baltimore, MD

AR400363

POLREP #15

Kane and Lombard Streets Drum Site
CERCLA Immediate Removal Project
Baltimore, Maryland

I. SITUATION (2300 hrs., 5/13/84)

- A. 0845 hrs., this date. drum removal recommencing. At this time, softball games are occurring on adjoining ball fields. Approximately 362 drums removed COB, this date. Of these approximately 100 are solids, 3 are liquids and 250 are classified as emptys. Three of these drums have been overpacked (liquid drums).
- B. During removal activities, continuous spare monitoring (perimeter walking and pumps) is implemented.
- C. 1130 hrs., this date, on site personnel identified unauthorized persons inside hot zone in southeast corner of site approximately 100 yards from drum removal activities. Individual only remained there a short time.
- D. This date, personnel on scene:

- 2 - EPA/OSC
- 3 - State
- 3 - USCG
- 3 - TAT (1 on the job training)
- 12 - ERCS

E. COB, 5/13/84, estimated extra mural cost to date:

<u>CONTRACTOR</u>	<u>COSTS</u>	<u>CEILING</u>
ERSC	75K	250K
State	8.2K	50K
<u>USCG/TAT</u>	<u>12K</u>	<u>25K</u>
Total	92.5K	325K

Estimated Intramural costs (EPA and FRT) is approximately 4K (ceiling: 15K)

- F. No fence installation activities ongoing today.
- G. 1300 hrs., this date Chief Warrant Officer (CWO) Edmonds (USCG/AST) on site to relieve Lt. Glenn of site duties at Kane & Lombard. AST person expected to relieve BM-2 Montgomery at same time next week.
- H. As today is Mothers Day, this was expected. OSC anticipate press to resume interests Monday, 5/14/84. However, significantly less than previous week.
- I. 1500 hours, drum removal activities ceased for the day.

II. ACTIONS TAKEN

- A. 1230 hrs., this date, OSC received written data of air sampling analysis. TAT reviewing for determination of extent of air release if any.
- B. During drum removal, air pumps on site at designated stations off site by TATs. Also, continuous perimeter monitoring being conducted by MDWMA.

AR400364

POLREP #15 (CONT)

- C. TAT, as requested by OSC, preparing cost estimate for ERCs over project. This is to assist OSC on his modification of ERCs delivery order.
- D. TAT reviewing and interpreting analysis, results of baseline air sampling (tenex tubes) data. Samples were taken Wednesday 5/11/84.

III. FUTURE PLANS

- A. Two TAT to provide technical support to OSC until future notice (over weekend there were 3 TATs).
- B. IG to be on site at some unknown future date.
- C. 1500 hrs., 5/14/84, OSC to attend faculty meeting with Superintendent of Schools and faculty of Patterson High School at the school. OSC to re-emphasize that it may be in students best interest not to breach security on site.
- D. OSC expects results of four priorities carbon air sampling tubes (taken 5/10/84) on 5/14/84 from OH Materials-MAB.
- E. Drum removal activities expected to continue tomorrow as weather forecast is favorable.

Robert E. Caron

Mark Cox

OSC - Region III
Philadelphia

OSC - MDWMA
Baltimore, Maryland

AR400365

POLREP #16 - Kane & Lombard Streets Drum Site
Baltimore, MD
CERCLA Immediate Removal Project

I. Situation (2300 hrs., May 14, 1984)

- A. Today 288 drums removed and placed in appropriate containment cells. To date: 656 drums removed; 401 empties, 249 solids, 6 liquids (overpacked).
- B. Personnel on scene: EPA/OSC - 1, State (MDWMA) - 4, USCG/AST - 2, City (Health Dept.) - 1, TAT - 2, ERCS - 13, Subcontractor - 5.
- C. COB 5/15/84 estimated extramural costs to date:

<u>Contractor</u>	<u>Costs</u>	<u>Ceiling</u>
ERCS	\$81k	\$250k
State	9k	50k
USCG/AST & TAT	13k	25k
Total	\$103k	\$325k

Estimated intramural cost for EPA and ERT is \$4,200 (ceiling \$15k).

- D. Press interest high today. Channel 13 on site, Channel 11 (WBAL-TV) contacted OSC via telephone. Both media televised stories during news broadcasts.
- E. 1900 hrs., this date, community meeting held to discuss this site and other areas believed to be similar in nature around local residences. State OSC and other State personnel attending meeting.
- F. Today's weather (as per National Weather Service): Sunny, temperatures into low 70's, northwest winds 15 to 25 mph. Same conditions to remain through Wednesday, 5/16/84.
- G. State air lab not on scene today. Lab incurred problems with their generator.
- H. 1500 hrs., this date, ERCS' grappler broke down. Problem appears to be minor and will be repaired as soon as possible. Loss of this piece of equipment is critical as it is essential to drum removal operations.
- I. During drum removal operations continuous perimeter air monitoring was in effect. Air pumps were placed on site and off site in accordance with the air monitoring program.
- J. 1500 hrs., this date, Federal and State OSC (Steve Jarvela, Frank Henderson) and USCG/SSO (CWO Edmonds) met with superintendent of schools (Francis Thomas) and faculty of Patterson High School. OSC stressed potential risks associated with unprotected/unauthorized site entries, and requested cooperation in observing restrictive boundaries.

AR400366

II. Actions Taken

- A. OSC invited those present at faculty meeting of Patterson High School to come on site if they had further questions.
- B. USCG/SSO requested the establishment of a uniform access point on site. OSC concurred.
- C. Due to windy conditions, it is difficult to permanently place banner guards around site. OSC requested SSO to monitor integrity of banner guard and replace as needed.
- D. City Health Dept. continuing to investigate options for an EMT on scene as heat stress monitoring will be implemented as warm weather approaches.
- E. USCG/SSO requested the establishment of specific areas designated as dress in/out areas at decon. OSC concurred. Operations tomorrow will not commence until this is in place.
- F. TAT preparing summary of costs expected to be incurred by ERCS for total project.
- G. USCG/SSO continuing to hold daily morning safety meetings with contractors personnel.
- H. OSC requested ERCS to install power line to air lab so that lab need not use generator.

III. Future Plans

- A. Measuring and sampling plan to begin implementation 5/16/84. ERCS sampling team to be on site 1200 hrs., 5/15/84, with necessary equipment for proper sampling and shipping procedures.
- B. Highland Fence Co. expected to complete fence installation tomorrow. Now approximately 85% complete.
- C. OSC, SSO and ERCS designated exit area in fence behind bottle change for emergency exiting for on-site personnel.
- D. Drum containment cells to be completed tomorrow. There will be 3 containment cells on site; 1 containing empties completed, 1 containing liquids to be completed as needed, 1 containing solids to be completed tomorrow. All lined with visqueen and clay with a berm around them.

Stephen Jarvela, OSC
U.S. EPA Region III

AR400367

King and Lombard Streets Drum Site
CERCLA Immediate Removal Project
Baltimore, Maryland

T. SITUATION (2300 hours, May 15, 1984)

- A. State Lab encountered problems with their generator. Lab operating at main office on AC power until proper AC can be provided on site.
- B. Press Interest continues to remain high. Channel 11 & Channel 13 on site. The story was televised during news broadcast.
- C. Sampling and Measuring Plan to be implemented tomorrow. Initial preparation work was completed today by the TAT's. Two (2) ERCS personnel are expected to assist the TAT's in the multimedia sampling and measuring activity on site.
- D. Today's weather (as per National Weather Service): partly cloudy, temps. in the 60s during daytime and low 30s at night. NW winds at 15-25 mph.
- E. This date, personnel on-site:
 - 1 - EPA/OSC
 - 3 - State
 - 2 - USCG
 - 2 - TAT
 - 15 - ERCS

F. COB, 5/16/84, estimated extramural costs to date:

<u>CONTRACTOR</u>	<u>COSTS</u>	<u>CEILING</u>
ERCS	98K	150K
State	10F	50K
USCG/TAT	14.4K	25K
		10K

Estimated intramural costs (EPA & ERT) is approx. 4.5K (ceiling: 15K)

- G. Fence installation completed today. Emergency exit for personnel has been provided along the fence line.
- H. TAT's continue to provide air monitoring support to the OSC in conjunction with the State and ERCS.
- I. Verbal results on the 4 priority carbon tubes (taken 5/10/84) indicate non-detectable levels of organic vapor in the ambient air and on the site.

AR400368

J. Status of drums removed/staged/overpacked as of COB today:

	<u>TODAY</u>	<u>%</u>	<u>CUMMULATIVE</u>	<u>%</u>
Total # of drums removed and staged -	103	-	759	-
Total # of drums overpacked -	3	3	9	1
Total # of solid (not overpacked) drums removed and staged -	100	97	349	47
Empty drums removed -	0	-	401	52

- K. Tat observed HNU-PID Reading of 2-3 ppm in the drum staging area. Source was identified as an amber gelatinous material. All overpacks were secured and other exposed material covered by ERCS.
- L. State perimeter monitor reported faint odor and slight HNU reading at site boundary. Reading were not continuous but reported as 0.3-0.7 ppm deflections.
- M. OSC concerned about shortage of TAT's and AST personnel to provide adequate contractor monitoring on site. Video and photographic documentation continues to be minimal on-site due to support personnel shortage.
- N. City advised OSC that an EMT is not available for monitoring workers for heat stress. OSC considering alternative sources for EMT Monitoring.
- O. Amend Polcap #16. Situation paragraph J to read (...USCG/AST SSO CWO Edmonds, Baltimore City Fire Dept. Capt. Jim Henry, and Baltimore City Health Dept. Elkins Bahle, met with....)

II. ACTION TAKEN

- A. TAT's, as directed by OSC amended the site safety plan to include protocol for heat stress situations that may be encountered during site work.
- B. TAT's contacted EPA - Central Regional Lab (CRL), Dan Donnelly and EPA - Environmental Monitoring Systems Lab in North Carolina (EMSL), Howard Crist, to establish appropriate QA/QC procedures for the multimedia (air, water, soil and drum) sampling being conducted on-site. Howard Crist of EPA-EMSL offered to spike appropriate media used for air sampling with known compounds and known concentrations at the EMSL Lab in North Carolina with a guide turnaround time of seven (7) days to meet the needs of this removal project. Also, CRL - Dan Donnelly has made arrangements to provide QA/QC on some split samples that will be obtained on-site.
- C. EPA, State and TAT conducted site entry to assess staging area operations concerning positive HNU Air Readings.
- D. OSC, State, TAT and ERCS reviewed staging operations and concurred that all amber or similar materials be immediately overpacked and secured before staging. Amber material was observed to be generating up to 500 ppm in the drumheadspace.
- E. TAT placed air pumps in staging area and down wind off site to monitor release.
- F. SSO directed changes in decontamination area to improve decon procedures.

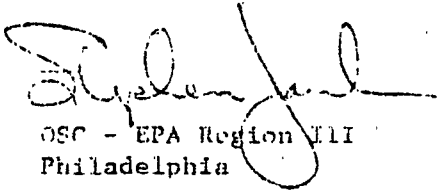
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- G. Drum removal operations with minor delay due to grappler equipment failure which reduced drum staging productivity 60%. ERCS compensated by completing staging areas during grappler down time.

III. FUTURE PLANS

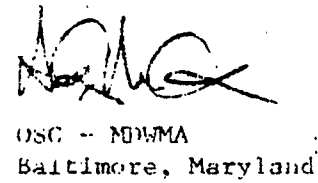
- A. USCG/AST to brief site personnel on potential first aid and heat stress related problems.
- B. Electrical Contractor to provide AC power for Mobile Air Lab by COB 5/16/84.

Stephen Jarvela



OSC - EPA Region III
Philadelphia

Mark Cox



OSC - MDWMA
Baltimore, Maryland

AR400370

FOURREP 418

LANE AND LOMBARD ST. DRUM SITE
ERCS/STATE IMMEDIATE REMOVAL PROJECT
BALTIMORE, MARYLAND

I. SITUATION (WEDNESDAY, 2300 hrs., 5/16/84)

A. OSC concerned about shortage of TAT and USCG/AST personnel to provide adequate contractor monitoring, technical support and documentation. Video and photographic documentation continues to be minimal on-site due to support personnel shortage.

B. Personnel on scene:

EPA - 1	TAT - 2
USCG/AST - 2	ERCS - 18
State - 8	Baltimore City - 3

C. COB, 5/19/84, estimated extramural costs to date:

<u>CONTRACTOR</u>	<u>COSTS</u>	<u>CEILING</u>
ERCS	121.5K	250K
State	10K	50K
TAT/AST	15.5K	25K
<u>TOTAL</u>	<u>147K</u>	<u>325K</u>

Estimated intramural costs (EPA & RRT) is approx: 6K (ceiling: 15K)

D. Status of drums removed/staged/overpackes as of COB today:

	<u>TODAY</u>	<u>CUMMULATIVE</u>
Total # of drums removed	323	1082
Liquid	3	14
Solid	4	348
Empty	311	718

E. EPA HQ contracts personnel on scene to tour site 1100 hrs.

F. Air Lab Power drop partially completed. Lab on scene 1600 hrs., final hook up tomorrow morning.

G. Local citizen visited site with B&W photo of site from 1968. Photo shows open burning on a portion of site. Citizen reported that site was a dump in 1951 when he moved into the area. State obtained photo for purposes of copying and enlarging.

H. State perimeter air monitoring did not show any detectable odors or reading off site. Continuous monitoring program still in place during removal operations.

ARL00371

II. ACTIONS TAKEN

- A. OSC discussed site activities and ERCs contract with EPA HQ. Contract personnel visiting site.
- B. TAT and ERCs conducted multimedia sampling on site.
- C. TATs Mike Bala & Jay Matwani continue to provide excellent technical support, although snorthanded, which require long hours.
- D. OSC directed TATs to arrange for additional support for weekend to allow current personnel time off.
- E. Nancy Suska BCHD and Lloyd Stauffer ERCS identified potential sites for mobile lab if brought on scene. Ms Suska currently investigating.
- F. State personnel met with Baltimore Dept. of Education to discuss and locate off site monitoring wells.
- G. Charles Courtney, BCHD, obtained drawings of water line in area of proposed monitoring wells at rear of site.

III. FUTURE PLANS

- A. State lab to be operational on scene 5/17/84 morning.
- B. OSC to request additional TAT support to assist in sampling and documentation.
- C. State to install two upgradient ground water monitoring wells in effort to provide additional contaminate information.

John J. ...
John J. ...

OSC - EPA Region III
Philadelphia

Mark Cox

Mark Cox

OSC - MDWMA
Baltimore, Maryland

POLREP #19

KANE AND LOMBARD ST. DRUM SITE
CECCLA IMMEDIATE REMOVAL PROJECT
BALTIMORE, MARYLAND

I. SITUATION (THURSDAY, 2300 hrs., 5/17/84)

- A. Due to concerns over heat stress and site safety, the OSC & SSO implemented a heat stress program which will include a Medical Monitor (RN) on scene from 0900-1700 hrs., while site operations are ongoing.
- B. On-site sampling of soils and water as per the Sampling and Measuring plan was completed by TATs.
- C. Carbon tubes for air monitoring analysis were sent out on an Emergency basis to Century Labs., New Jersey. The prior arrangement with OHM Lab was canceled due to inability of lab to provide analytical services as per OSC specs.
- D. Baltimore City Fire Dept. on scene this date to prepare a pre-plan for possible fire emergency as part of the site Emergency Action Plan.
- E. EPA/EPD personnel, J. Humphrey, E. Zeller & J. Casady (USCG/EPA Liaison) on site this date to observe site operations and discuss FPCS contract with OSC.
- F. COB, 5/17/84, estimated extramural costs to date:

<u>CONTRACTOR</u>	<u>COSTS</u>	<u>CEILING</u>
ERCS	136K	250K
State	12K	50K
USCG/TAT	17K	25K
Total	165K	325K

Estimated intramural costs (OPA & ERT) is approx. 5K (ceiling: 15K)

G. This date, personnel on-site:

1 - EPA/OSC	3- TAT
4 - State	19- ERCS
2 - USCG	1 - City

H. Today's weather (as per Site Air/Contractor Monitor Logbook): sunny & windy, temps. 45°(AM) - 75°(PM). NW winds at 5-10 mph.

I. Status of drums removed/staged/overpacked as of COB today:

	<u>TODAY</u>	<u>TO DATE</u>
Total # of drums removed	51	1133
Liquid	-	17
Solid	5	353
Empty drums removed	46	764

ARL:00573

POLREP #19 (CONT)

II. ACTIONS TAKEN

- A. MDWMA continues perimeter monitoring, no elevations in ambient organics leaving the site have been detected recently.
- B. OHM ERCS mobile lab is prepared to be brought on site within 5 hrs. of decision to have it on scene. Electrical drop to proposed location will take approx. 24 hrs. Anticipate lab to be on scene tomorrows date.
- C. TATs complete the site soil and water sampling program specified in the Sampling and Measuring Program.
- D. OSC contacted TATL to request that one additional TAT be available to assist in sampling and documentation. TAT on scene 1130 hrs., 5/17/84.

III. FUTURE PLANS

- A. ERCS working on plan & pricing estimates for site stabilization and restoration.
- B. Drum restaging operation expected to be completed by 19 May 1984.
- C. AST Command to be on scene 18 May 1984.
- D. Bob Caron to relieve Steve Jarvella as OSC on project, 19 May 1984.
- E. EPIC to be contacted to ascertain status of aerial photographic information.
- F. Community Meeting to be held 1700 hrs., Tuesday May 22, 1984 between OSC SPM, AST & Citizen Leaders. Meeting to be held in Student Lounge at Patterson Park High School.
- G. TATs to ship soil & water samples to Contract Labs, EPA CRL Annapolis, and a private lab to obtain quick turnaround on analysis. Appropriate blanks and duplicates were incorporated to achieve strident QA/QC as per discussion with Dan Donnelly (EPA-CRL.)

Steve Jarvella for

OSC - EPA Region III
Philadelphia

Mark Cox

Mark Cox

OSC - MDWMA
Baltimore, Maryland

POLREP # 20

FINE & LOMBARD STS. SITE
CRUISE & IMMEDIATE REMOVAL PROJECT
BALTIMORE, MARYLAND

I. SITUATION (FRIDAY, 2300 hrs., 5/17/84)

A. COB, 5/17/84, extramural costs to date:

<u>CONTRACTOR</u>	<u>COSTS</u>	<u>SETLIM</u>
ERCS	150K	250K
State	13.5K	50K
USCG/TAT	18.5K	25K
<u>TOTAL</u>	<u>182K</u>	<u>325K</u>

B. Status of drums removed staged/overpacked as of COB today:

	<u>TODAY</u>	<u>TO DATE</u>
Total # of drums removed staged	10	1143
Total # of drums overpacked	-	17
Total # of solids (not overpacked drums removed & staged)	-	358
Empty drums removed	10	764

C. In addition to 10 drums being moved from site this date, 5 - 10 5-gallon pails were also staged and removed.

D. Cdr Kohrer, Commander of USCG/AST on scene this date for inspection.

E. Due to continuous concern over heat stress, amendments were made to SHP. As per amendments, a medical monitoring program was initiated. Nurse (RH) on scene this date. Constant checks will be made on personnel's vital signs upon entry & exit of decon.

F. This date, personnel on-site:

WPA/OS - 1	TAT - 3
State - 4	ERCS - 18
USCG - 2	City - 1

G. Soil/Water sample packaging completed by TATs. Sampling enroute via mail to respective analysis labs.

H. OSC, S. Jarvela to leave site COB, this date. OSC R. Caron to return on scene 5/19/84.

AR:00375

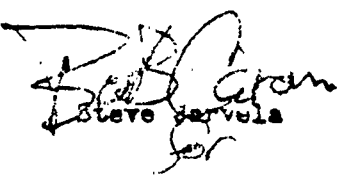
POLREP #20 (CONT)

II. ACTIONS TAKEN


- A. Baltimore City Fire Department has completed and forwarded to OSC Pre-Plan for fire emergencies. In event of fire emergencies, this will be activated by all personnel.
- B. Baltimore City Survey Crew on scene to clear up ambiguities of Fence Line/Property Line boundaries. It was determined that fence line actually intruded into 90ft. of adjacent property (belonging to Roadway Express) on west boundary.
- C. Civic concern over site impact on ball fields remain high. All data received from soil analysis indicated no organic contaminants and below EP Toxic Limits for metals. No incidents of offsite organic vapor migration has been detected. This information will be dispersed via letter by MD WMA to civic groups.
- D. CHM/ERCS lab trailer arrives on site. Trailer is set up on city warehouse #3 property behind City Hospitals.
- E. Medical Monitoring Program detected blood pressure adversity in one ERCS personnel. RN released him from site operations for day.

III. FUTURE PLANS

- A. ERCS Lab Trailer on site. Power drop and hook up of trailer for full analytical capability within 24 hrs.
- B. Decon-Pad to be constructed for equipment decontamination. Also a Holding Tank and water laser will be imported for that purpose.
- C. Drum Disposal Options/routes await OSC decision, and results of on site analysis.
- D. Options for site stabilization and project close out to be identified ASAP.


Steve Savvula
for

OSC - EPA Region III
Philadelphia

Mark Cox


OSC - MDWMA
Baltimore, Maryland

AR400376

POLREP #21

KANE & LOMBARD STREETS DRUM SITE
CERCLA IMMEDIATE REMOVAL PROJECT
BALTIMORE, MARYLAND

I. SITUATION (SATURDAY, 2300 hrs., 19 May 1984)

- A. Continued concern over heat stress and site safety. RN continues medical monitoring of personnel upon entrance on & exit off exclusion zone.
- B. Drum sampling will be completed by O&M/ERCS (only liquid & lab pack remain). Compability testing will be done all day tomorrow (5/20/84) on 24 hrs basis by ERCS. Estimate 1/2 done by Monday (5/21/84) morning.
- C. Concrete Formwork and subgrading for Equipment Decon Pad completed this date.
- D. Eight (8) buried drums were located in a cluster when one surface drum was removed. This affirmed OSC suspicion that a number of subsurface drums and their location is uncertain and more drums would be found if further surface soil is disturbed.
- E. Level "C" area extended beyond decon area as results of uncovering crushed drums and contaminated soil, and downwind spiked readings of 5 ppm. Situation remedied & perimeter returned to original area within two hours.
- F. Today's weather, sunny & Calm, temps: 60 - 93°F SE winds at 0-5 mph W winds at 5 - 10 mph.
- G. COB, 5/19/84, estimated extramural costs to date:

<u>CONTRACTOR</u>	<u>COST</u>	<u>CEILING</u>
ERCS	168K	250K
State	13.5K	50K
<u>USCG/TAT</u>	<u>21K</u>	<u>25K</u>
Total	201.5K	325K

Estimated intramural costs (EPA & ERT) is approx 6K (ceiling: 15K)

H. This date, personnel on-site:

EPA/OSC - 1	TAT - 2
State - 4	ERCS - 18
USCG - 2	City - 1

I. OSC R. Caron returned on scene this date.

AR4:00377

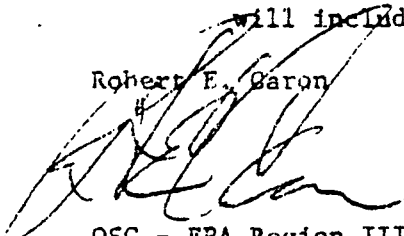
II. ACTIONS TAKEN

- A. OSC tasked ERCS with coordinating all future efforts such as: drum compatibility testing and disposal options, such that no down time will be encountered.
- B. TAT and OSC will investigate the use of MDWMA Lab for Quantitative analysis on waste classes encountered in drums.
- C. OSC tasked TAT with option study for final site stabilization plan. Options being considered will be dependent upon results of analysis of soil samples due Friday 5/25/84.
- D. OSC requested proposed route for trucks carrying wastes through city. City and MDWMA to identify best route.
- E. MDWMA continuing regular air monitoring around perimeter of site. Readings were below background detection except during cluster drum incident near decontamination trailer.


III. FUTURE PLANS

- A. Equipment Decon pad to be completed (poured & cured) NLT Tuesday (5/22/84).
- B. Community meeting is scheduled for 1:00 p.m., Tuesday 5/22/84 at Patterson High School.
- C. Washington DC - EPA/ERD to be on scene 5/22/84.
- D. Region III Director Hazardous Waste Management Division, Stephen Wasserbug to be on scene 5/22/84 for site visit.
- E. OHM/ERCS Corporate officials expected to be on site Tuesday 5/22/84.
- F. OSC plans to establish on scene task group to identify and seek consensus as to final site stabilization at project close. Members will include ERT, EPA, MDWMA, TAT, ERCS and City.

Robert E. Baron


OSC - EPA Region III
Philadelphia

Mark Cox


OSC-MDWMA
Baltimore, Maryland

AR400378

FOURREP #22

KANE & LOMBAUO STREETS DRUM SITE
CERCLA IMMEDIATE REMOVAL PROJECT
BALTIMORE, MARYLAND

I. SITUATION (1200 hrs., 5/21/84)

- A. 1000 hrs., 5/21/84, OSC requested modification of ERCS delivery order to adjust ceiling to 325K.
- B. 0900 hrs., this date, Mr. Azroel, property owner, on site for briefing. OSC referred him to EPA/legal attorney Kermit Rader.
- C. 5/20/84, MDWMA and OSC discussed with BCFD personnel concerns over first response to a fire situation, should it occur, during non-working hours and prior to arrival of OSC/state personnel.
- D. Personnel on scene, this date:
- | | |
|-------------|-----------|
| 1 - EPA/OSC | 2 - TAT |
| 5 - State | 18 - ERCS |
| 2 - USCG | |
- E. COB, 5/21/84, estimated cost to date:

<u>CONTRACTOR</u>	<u>COST</u>	<u>CEILING</u>
ERCS	190K	250K
State	17.5K	50K
USCG/TAT	22K	25K
TOTAL	229.5K	325K

Estimated intramural cost (EPA & ERT) is 6.5K (ceiling 15K)

II. ACTIONS TAKEN

- A. TAT/ERCS submitted to OSC project cost estimate expected to be incurred by ERCS. Estimate is 480K (extramural).
- B. Perimeter air monitoring continuing. Monitoring being performed by MDWMA.
- C. 0800 hrs., 5/20/84, during first perimeter air monitoring, MDWMA observed and reported that fence had been breached on east side of site (adjacent to ball fields). AST and ERCS resecured area.
- D. MDWMA recommended to OSC and TAT that contact be made with state (DNR) personnel to provide direction in final stabilization plan so as to comply with state laws. MDWMA will be lead in having state personnel on site to provide any assistance.

AR400379

FDRREP #22 (CONT)

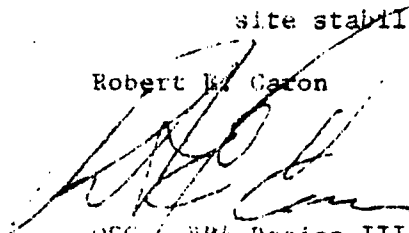
II. ACTIONS TAKEN (CONT)

E. ERCS continuing to perform compatibility studies for disposal.

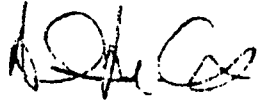
III. FUTURE PLANS

- A. Due to excessive demand for Region III TATM's, Washington TAT to be on site 1400 hrs., this date.
- B. Director, Region III, Harzardous Waste Division, Steve Wassersug, to be on site 5/22/84.
- C. Community meeting scheduled for 1700 hrs., 5/22/84 at Patterson High School. Meeting to inform public of progress made at site and future plans.
- D. TAT, thru special projects, obtaining surveyor to shoot site for elevations and percent grade to aid OSC in determining action regarding site stabilization.

Robert L. Caron


OSC - EPA Region III
Philadelphia

Mark Cox


OSC - MDWMA
Baltimore, MD

AR400380

Kane and Lombard Sts. Drum Site
CECRLA Immediate Removal Project
Baltimore, Maryland

I. Situation(2300 hrs., 23 May 1984)

- A. Personnel On-Scene This Date: EPA/OSC -1
USCG/AST- 3
MDWMA- 3
TAT- 3
EPCS- 18

B. Cost as of C.O.B. 5/23/84, estimated extramural costs to date:

<u>CONTRACTOR</u>	<u>COSTS</u>	<u>CELLING</u>
EPCS	213K	500K
State	20.3K	50K
TAT/USCG	25.2K	25K (1 work day left)
<u>Totals</u>	<u>258.5K</u>	<u>575K</u>

- C. OSC & SPM met with the community leaders from the Bayview Assn. to advise them of site status and health related concerns. Those present at the meeting included: EPA, CDC, MDWMA, Balto. City Health, Bayview Assn. and Lastwood Civic Assn. 5/22/84.
- D. At 1600 Hrs. 5/23/84 OSC received verbal approval from contracts officer to increase the EPCS contract ceiling to \$500,000.
- E. Several EPA officials visited the site 5/22/84. These officials included personnel from Regional Office (including Steve Wassersug, Director EPA III Hazardous Waste Management Division, ERD and EPA Contracts. Visiting the site with Mr. Wassersug was Mr. Ben Nelson, Director Md. Waste Management Admin. The OSC briefed all these officials on site operations
- F. OSC concerned at lack of sufficient support personnel on-site to perform all the support activities to the fullest. Site activities affected by the lack of sufficient support personnel are documentation (including Video), contractor monitoring, technical assistance and site logistics.
- G. OSC concerned at continued lack of TAT resources. However, through long hours TATs continue to provide excellent technical assistance to the OSC. TATs unable to provide any assistance in contractor monitoring activities.
- H. TATs continue to provide air monitoring and sampling/ monitoring support on site to the OSC.

AR400381

I. 1500 hrs 5/23/84 heavy thunderstorms w/ high winds inhibited site operations
1515 hrs OSC decided to cease on-site operations.

II. ACTIONS TAKEN

- A. The high temperature (greater than 90 F) created "very hot " working conditions in level B / level C protection on-site. Work terminated early (1600 Hrs.) due to the potential heat stress conditions. 5/22/84.
- B. OSC, USCG/AST (Safety Officer), SPM, and ERCS Response Manager had meeting at 1700 hrs regarding heat stress related issues and slow down of site operations. It was decided that the medical monitoring on-site would be of an advisory nature and decisions regarding heat stress for ERCS personnel would be made directly by ERCS Response Manager under direction of OSC. Therefore, OSC directly maintaining responsibility for heat stress related issues from the safety plan. 5/22/84.
- C. O.H.M. on-site lab expected to complete the compatibility studies on drums samples by 5/23/84. The lab is expected to leave the site on 5/24/84. From available data on compatibility studies flammable solids are about 10-15 % of the total # of non-empty drums.
- D. AS directed by the OSC, ERCS contractor commenced "grubbing" of the site to further detect the presence of any surface drums in overgrown areas. During periods of time when grubbing operations moved closer to the support area (command post, ORM trailer, State trailer, etc.) the support area was evacuated as a precautionary measure, 5/22/84.
- E. OSC increased obligated ceiling for TAT and USCG (mission support) to 50K Allan Humphrey EPA/ERD advised 5/23/84.
- F. TATs directed a contractor under TAT special projects to perform a topographical survey of the site. Site work for the survey completed today.
- G. OSC decided to mobilize drum shredder this date, 5/23/84, from ERCS base, Findlay, OH. Shredder expected to be on site 5/24/84, to be used for bulking of solid, non-flammable drum material.
- H. OSC (EPA) and State SPM discussed sediment control plan with Balto. City. IT was decided that plan will be jointly developed and approved by EPA & MdWMA.

III. FUTURE PLANS

- A. OSC awaiting hard copy data on carbon tube analysis by Centry Labs. Verbal data indicates presence of trace amounts of styrene besides solvents like toluene, benzene, ethyl benzene etc.

POURREP # 23 (cont.)

- B. OSC awaiting analytical data on soil and composite drum sample from Martel Labs. Due date Friday May 25, 1984.
- C. OSC awaiting analytical data from EPA Central Regional Lab, Md.
- D. OSC to organize on-site task force to concentrate on sediment control plan/erosion control.

Robert Anton, OSC

US EPA
Philadelphia, Pa.

Alex Cox, SPM

MDWMA
Baltimore, Md.

ARL:00383

CERCLA IMMEDIATE REMOVAL PROJECT
 KANE AND LOMBARD STREETS DRUM SITE
 BALTIMORE, MARYLAND

I. SITUATION: (1600 hrs., 5/28/84)

A. As of Thursday, 5/24/84, drum shredding operation was to commence. ERCS response manager provided OSC with cost estimates illustrating cost savings associated with the use of this equipment. Cost savings are a result of reduced drum handling, reduced transportation, and reduced disposal costs. Due to mechanical failures this equipment has failed to operate to this date. Only a minimal amount of drums have been shredded. These equipment failures have resulted in almost two full days of downtime and resultant standby costs (approx. 10K) and equipment standby costs (approx. 7K). Holiday weekend has made effective repairs difficult to obtain. OSC has charged ERCS to effect repairs ASAP as standby costs are high and directly impact project ceilings and schedules. Constant shredder equipment failures (5/24, 5/25, 5/26, 5/27) have OSC extremely concerned over effectiveness of this equipment.

B. Measuring and sampling complete except for drum samples needed for NETA. All sampling activities coordinated for quality control via EPA/CRL, Dan Donnelly. Verbal preliminary data received Friday, 5/25/84, indicates the following compounds present at significant levels in drums:

- Acrolein 12 percent
- benzene 6300 ppm
- ethyl benzene 2800 ppm
- toluene 25.5 percent
- chromium 1100 ppm
- lead 6000 ppm
- phthalates 3000 ppm
- PNAs 200-300 ppm
- PCB 58 ppm

Soil samples appear to be relatively free of organic contaminants of concern. Levels of metals appear to be high, however EP TOX levels have not been exceeded. Final, Quality controlled results due 5/29/84. Second round samples due by 6/15/84.

C. Osc tasked TAT to draft site stabilization plan to include:

- soil erosion control
- slope stabilization
- limited backfilling
- 3 to 6 inch topsoil
- hydroseeding

D. Osc anticipates the following schedule for project completion:

- Shredding complete by 6/2/84
- disposal complete by 6/5/84
- site stabilization complete by 6/5/84

E. Estimated project costs to date; (COB 5/26/84)

	<u>Cost</u>	<u>Ceiling</u>
ERCS	25.7K	500.
State	25K	50K
TAT/USCC/AST (Mission)	20K	50K
Intramural	RE	

F. Personnel on scene:

EPA-1
 State-4
 USCG/AST-1
 TAT-1
 ERCS-16
 City-1

- G. Press and community interest still evident. Regular updates provided via MDWMA and EPA public affairs. One T.V. station on scene Sunday 5/28.
- H. OSC still concerned over lack of available TAT resources to provide technical and documentation support. USCG/AST unable to provide personnel due to other commitments.
- I. MDWMA continuing off site perimeter air monitoring. On site state lab providing analysis of air and soil samples.
- J. Total removed drums-1163
 Total RCRA empty drums-821
 Total non-flammable drums-294
 Total flammable drums-48

II. ACTIONS TAKEN

- A. OSC provided briefing and tour to Baltimore City health officials.
- B. Secretary Adel Wilzack (Dept. of Health and Mental Hygiene), Elkins Dahle (Chief of Bureau of Industrial Hygiene) along with staff members on scene to tour site. Roy Nelson, Frank Henderson, Mark Cox from MDWMA and the OSC conducted tour and briefing.
- C. ERCS complete overpacking and solidification of flammable liquids and solids.
- D. ERCS actively arranging and negotiating transport and disposal of flammable liquids and solids as well as waste from shredding operation.
- E. Tat special projects surveyor on scene to provide necessary information for site stabilization plan. 5/25/84
- F. OSC received official notification of increase of ERCS delivery order ceiling to 500K. (5/24/84)
- G. Rough grading of site begun 5/25/84 in preparation for final site stabilization.

III. FUTURE PLANS

- A. Shredder repairs to be effected immediately and shredder operations to be complete by 6/2/84. OSC tasked Eres with providing effectively operating equipment by 5/29/84.
- B. Final approval for transport and disposal still pending. Upon approval, T&D could begin as early as 6/1/84.
- C. Regrading and soil cover to commence 5/29/84. Site stabilization plan concurrence and approval still pending from state and city sources.

D. Community... AR400385... 5/29/84 with...

- E. Public meeting to be scheduled shortly.
- F. OSC to contact remedial personnel, effect critical information file transfer to aid in site consideration for NPL. Local Citizen and government concern remains high as regards future plans for study and cleanup of this site. OSC to inform remedial personnel of these concerns and will aid as much as possible in order to effect a smooth and timely transfer of this site to the remedial program.
- G. OSC to discuss interim site monitoring with state officials.

Robert E. [Signature] for OSC

USPA
Philadelphia, Pa.

Mark Cox, SPM

[Signature]
MDWMA
Baltimore, Md.

AR600386

CERCLA Immediate Removal Project
Kane & Lombard Street Drumfire
Baltimore, Maryland

I. Situation (1600 hrs. 5/29/84)

- A.) Drum shredder repaired and operating. ERSC down time 5/28/84 caused by inoperable shredder less than 3k. No charge for shredder and other equipment. Minor restoration work performed in A.M. 5/28/84.
- B.) Over 90% of all drums shredded and stockpiled this date. All drums expected to be shredded by COB 5/30/84.
- C.) Heavy rains have hampered site stabilization activities. Topsoil cover unable to be installed.
- D.) Heavy rains have created minor soil runoff problems. Straw bales placed at runoff points to control sediment laden runoff.
- E.) Estimated cost to date: (COB 5/29/84)

<u>CONTRACTOR</u>	<u>COST</u>	<u>CEILING</u>
ERSC	270K	500K
MDDNR	28K	50K
TAT/OSG/AST	31K	50K
INTRAMURAL	9K	---

- F.) No air monitoring performed due to heavy rains
- G.) On Site IMT used for HEAT STRESS monitoring cancelled due to cool temperatures.

II. ACTIONS TAKEN

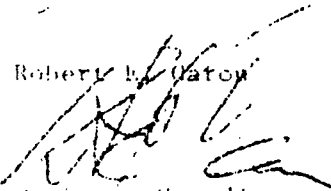
- A.) TAT completed and submitted site stabilization plan to OSC. Plan includes:
 - Topsoil Cover
 - Grading of Site to 2-3% slopes
 - Rip rap of steep slopes
 - Construction of clay berms and runoff trenches as necessary
 - Installation of sediment control structure at outlet
 - Hydroseeding
- B.) State Project manager (M. Cox) and TAT hand carried plan to MDDNR soil conservation. MDDNR unable to concur since plan does not meet criteria for state standard soil erosion control plans. It was determined that this project is exempt from standard soil erosion control requirements. MDDNR recommends the following:
 - Installation of temporary control measures (hay bales or silt fencing) until site revegetates
 - MDDNR to come on scene and review total plan and make additional recommendations as necessary. 5/31/84

ARL00387

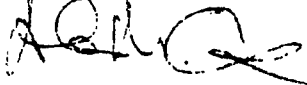
11. FUTURE PLANS

- A.) Final approval for disposal expected 5/31/84 T and D to commence immediately
- B.) Topsoil to arrive on site ASAP pending no rain
- C.) Baltimore City Health Dept (Dr. Susan Guarniere) to be on scene 5/11/84 for briefing on chemicals found on site in drums and soils
- D.) Community meeting with Community Leaders to be held . 1700 hrs. 5/31/84. EPA, MDWMA, City Health to conduct meeting
- E.) Public meeting to be scheduled shortly

Robert H. Eaton


On-Scene Coordinator
U.S. EPA Region III
Philadelphia, PA

Mark Cox


State Project Manager
MDWMA
Baltimore, MD

AR400388

CERCLA Immediate Removal Project
 Kane & Lombard Streets DrumSite
 Baltimore, Maryland

I. SITUATION (2300 hrs. 5/30/84)

- A.) Shredding operations 99% complete; through concentrated efforts by ERCS, the remaining drums were crushed (CB). To date all drums (100%) have been processed. Shredder to be demobilized ASAP.
- B.) Results of Carbon Tube Air Data samples taken 5/16 and 5/17/84 by TAT were forwarded by Century Labs. No significant amounts detected.
- C.) No site grading today due to rain and no tonnage delivery. Resurfacing operations to recommence as soon as favorable weather conditions permit. Projected demobilization date is tomorrow 6/1/84.
- D.) Personnel-on-scene:
 - ETA-1
 - State-4
 - USCG/AST 1
 - TAT 2
 - ERCS-13
 - City-1
- E.) Estimated Cost to date: (COB 5/30/84)

<u>CONTRACTOR</u>	<u>COB</u>	<u>GETTING</u>
ERSC	300K	500K
MDWMA	290	50K
TAT/USCG	11.9K	50K
INTRAMURAL	9K	

- F.) OSC continued concern over lack of TAT resources, future site operation pace will prove critical to project under present constraint of TAT stalling.
- G.) TAT-DPO (Tom Massey) again informed OSC of lack of available TAT resources for this project.
- H.) On Site Heat Stress monitoring was postponed due to cool temperatures.

II. ACTIONS TAKEN

- A.) On going erosion monitoring/study by TATs. Rainfall recorded as much as 1.14 inches since precipitation on Tuesday 5/29/84. This was minimal compared to records of 9.6 inches per day during a 5-year storm interval.
- B.) Air monitoring recommenced on P.M. site. downpour stopped.

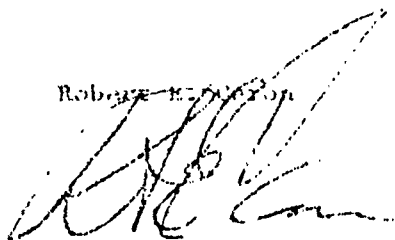
AR:00389

- C.) OSC tasked TAT with completion of drafted OSC report within 30 days of project completion.
- D.) State project manager, (Mark Cox) will handle state of Maryland Soil Conservation concerns and will act as a liaison between MDDNR and this project.

III. FUTURE PLANS

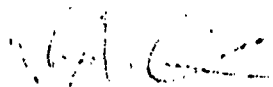
- A.) Drum transport/disposal off-site scheduled to commence Monday 6/4/84. However schedule may be advanced to Saturday since OSC is demanding aggressive action.
- B.) MDDNR representative, Ron Taylor scheduled to be on scene to make additional recommendations on soil stabilization plan and temporary control structures.
- C.) Final approval of disposal is still pending. Expected answer 5/31/84.
- D.) Dr. Susan Guarniere, Baltimore City Health Dept. expected on scene 5/31/84 to be advised on chemicals detected in drums and soils.
- E.) EPA, MDAMA and City Health to lead community meeting with community representatives on 5/31/84, 1:00 hrs.
- F.) Upcoming public meeting will be reserved for close of project.

Robert E. Hoffman



On-scene Coordinator
U.S. EPA Region III
Philadelphia, PA

Mark Cox



State Project Manager
MDAMA
Baltimore, Maryland

AR400390

SPECIAL PUBLICATION

ERCS Immediate Removal Project
Kane & Lombard Streets Drum Site
Baltimore, Maryland

1. SITUATION

This removal project involved a four phase approach designed to control, stabilize and mitigate the potential for direct contact, fire and explosion posed by the hazardous substances on-scene. The project involved providing site security via fencing; implementing a measuring sampling plan to define extent of contamination; removal characterization and disposal of over one thousand surface drums; site stabilization and restoration.

The original cost estimates (Action Memo-050K) were based on worst case conditions. Excellent co-ordination, logistical planning, work schedules, contingency planning and use of innovative technologies resulted in considerable cost and time savings. Present estimates indicate a savings of up to \$200,000 in contractor costs. Some of the salient cost saving features used at the site are as follows:

- Utilizing a local contractor at best bid price for installation of the fence-cost approximately \$13,000 as compared to original estimated \$30,000.
- Performing compatibility testing on-site utilizing an on-site mobile lab vs using an off-site lab.
- Using innovative technology of shredding vs crushing for bulking of drum wastes.
- Using a grappeler for moving of drums.
- Judicious distribution of analytical work from the sampling/measuring study between EPA contract labs and private labs with quick turnaround time.
- Cost effective procurement of topsoil (-\$7.00/cu yd) for site stabilization.
- Total dollar savings of up to \$175,000 to \$185,000-----

The use of these methods has resulted in a considerable time savings (Estimated 14 days) and minimal downtime.

---Final Estimated costs to Project Completion: for ERCS is 450K

	<u>ORIGINAL ESTIMATE</u>
Phase I- Security fencing 13K	30K
Phase II- Measuring and Sampling 60K	70K
Phase III- Removal, staging, compatibility, shredding and disposal 277K	500K
Phase IV- Site stabilization 14K	50K

Robert E. Caron
[Signature]
On-Scene Coordinator
U.S. EPA Region III
Philadelphia, Pa

Mark Cox
[Signature]
State Project Manager
MVA
Baltimore, Maryland

AR400391

GERCLA Immediate Removal Project
Kane & Lombard Streets Drum Site
Baltimore, Maryland

1. SITUATION (1800 hrs. 5/31/84)

- A.) 1700 hrs., OSC, SPM, MNRMA Officials and City Health Officials attended community meeting. Upon arrival it was discovered that community meeting had been cancelled & above listed officials were greeted by concerned citizens. The citizens had presented a list of concerns, they are:

Citizen Concerns

1. No more 5 o'clock meetings. (working people cannot attend.)
2. Want an independent agency to perform quality assurance testing indicating the specific amounts of chemicals found.
3. Want a complete list of compounds found, when and how they were tested, where they were found and at what levels, including those found in the ground.
4. Why did the City and State sit on this information for four (4) years?
5. Want to know who is responsible for making the decision not to release information regarding the landfill to the community.
6. want to know who did the dumping.
7. Want a medical screening of the community.

Citizens are concerned over possible exposure which may have occurred prior to this project and are requesting a review of all sampling data by health officials (CDC, State & City Health) with an eye towards possible health surveys. OSC and State Officials agreed to a review of all data by involved health officials and a public meeting scheduled for 6-26-84 where conclusions regarding public health issues can be made available. OSC requesting and coordinating the formation of this health committee upon receipt of final, complete, quality controlled data (due date 6-15-84).

- B.) 106 trucks (approximately 14 yds./ truck) on site with topsoil for site cover. ERCS grading soil and site as it arrives. Approximate total volume delivered to date is 1455 yds.

AR400392

- C.) Center engineering, thru TAT special projects, on site this date, to complete survey of site for topographical mapping.
- D.) This date OSC received hard copy of analysis of samples performed by Harrel Labs.
- E.) MDDNR representative Tom Gardner, not on scene today, as was scheduled. SPM contacted MDDNR to reschedule on-site meeting for 0700hrs. 5-1-84. MDDNR to make additional recommendations on soil stabilization plan and temporary control structures. Roy Benner MDDNR reviewing sediment control plan with an eye towards improvement and implementation.
- F.) State Air Monitoring Lab departed scene, COB, this date.

G.) Personnel on scene:

- EPA-1
- STATE-4
- ISOC/AST-1
- TAT-2
- MSY-1
- ERS-1

H.) Estimated extramural cost to date: (COB, 5/31/84)

<u>CONTRACTOR</u>	<u>COST</u>	<u>CEILING</u>
ERCS	290K	500K
STATE	70K	50K
ISOC/TAT	33K	50K
Totals	353K	600K

Estimated Intramural (EPA-ERT) cost to date: \$9300 (ceiling : 15K)

- I.) OSC concerned over lack of TAT resources, future site operation pace will prove critical to project under present constraint of TAT staffing.
- J.) SPM, Carl Cook, will handle state of Maryland soil conservation concerns and will act as a liaison between MDDNR and this project.

II. ACTIONS TAKEN

- A.) OSC decided to terminate efforts to obtain spiked air tubes from ESML for distribution to appropriate labs as an additional quality control/quality assurance. Project is near closure and the QA/QC program established by TAT is excellent. Therefore, there is no need to expend project funds for further quality assurance/quality control.
- B.) OSC gave notice to Executive Officer-OSG/AST concerning on-site AST personnel return to base, Wed. 6/6/84.
- C.) Permit air monitoring recommenced today, as dry weather warranted this action.

GROUP # 2, (cont.)

- D.) OSC tasked TAT with completion of draft OSC Report within 31 days of project completion.
- E.) OSC's SM scheduled final public meeting for June 26, 1984. At this time, all hard copy data from sampling will have been carefully reviewed by all appropriate parties (i.e. OSC, STATE, CDC, CITY Health).

III FUTURE PLANS

- A.) 500-600 truckloads of soil expected to be delivered to site for site cover. Weather conditions permitting, soil deliveries to continue 6/1 & 6/2/84 in order to complete site cover/grading operations. Estimated cost for 500 truckloads of soil is 42K.
- B.) Century Engineering to provide OSC with completed topographic map to aid in determination of site drainage paths and control structures as discussed in site stabilization plan.
- C.) At this time drum transport / disposal scheduled to commence Mon. 6/4/84. It will be known 6/1/84 if this operation can be performed on Sat. 6/2. Instead, an OSC demands aggressive action.
- D.) OSC expecting aerial photographs from EPA-EPIC on present due date of 6/1/84.

Robert C. Carson

On Scene Coordinator
EPA Region III
Philadelphia, Pa.

Alex M. Cox

State Project Manager
Md. DHA
Baltimore, Maryland.

AR400394

POLREP #28 - Kane & Lombard Streets Drum Site
Baltimore, MD
CERCLA Immediate Removal Project

I. Situation (2300 hrs., June 4, 1984)

- A. Trucks on site, 0900 hrs. this date, for transportation/disposal of drums to Fondessy. Six trucks were needed for shredded drums (approx. 120 yds. of material) and 1 truck was needed for overpacked drums (55 drums). However, the truck for overpacked drums was able to properly fit 54 drums, leaving 1 drum (PCB) behind.
- B. MDDNR, Ron Gardner, failed to appear on site this date as was scheduled. SPM requests his presence on site to obtain DNR's comments regarding proposed site stabilization structures.
- C. Personnel on scene: EPA/OSC - 1, State - 5, USCG - 1, City - 1, County - 1, TAT - 2, ERCS - 8.
- D. Two TATs on scene to offer technical assistance during site stabilization plan implementation and restoration. TATs also preparing draft OSC report as it is due 30 days upon project completion as per TAT/DPO direction.
- E. To date 779 trucks delivered topsoil by COB 6/4/84. Soil deliveries will continue tomorrow as grading and other site stabilization operations continue. Estimated cost of topsoil to date is \$70k (10k yds.).
- F. Press interest high today. Channel 11 (Action News), Channel 2 (News Scene) on scene. Also, Channel 13 (Eyewitness News) contacted site via telephone.
- G. COB 6/4/84 estimated extramural costs to date:

<u>Contractor</u>	<u>Costs</u>	<u>Ceiling</u>
ERCS	\$400k	\$500k
State	31k	50k
USCG/AST & TAT	36k	50k
Total	\$476k	\$600k

Estimated intramural cost (EPA, ERT) is \$10k (ceiling \$15k).

II. Actions Taken

- A. During drum transportation/removal, ERCS ensured proper disposal methods were used that were safe, efficient and adhered to all Federal, State and local requirements.

AR400395

II. Actions Taken (continued)

- B. Continuous on/off site air monitoring was conducted by State personnel and TAT during loading of shredded material. Low levels were detected downwind of operations. TAT placed air pumps downwind. Carbon tubes to be analyzed by Century Testing Laboratory.
- C. 1200 hrs. this date, Century Engineering delivered drafted topographic map to further assist OSC in determination of location of control structures during site stabilization.
- D. OSC addressing health concerns of local citizens as per meeting 5/31/84. These matters will be discussed during final public meeting 6/26/84. In preparation, OSC forwarded copies of all up-to-date sampling information to CDC for review and evaluation.
- E. OSC consulting with OPA regarding citizens' expressed concerns.
- F. ERCS investigating options for transportation/disposal of remaining overpacked PCB drum. ERCS informed OSC that Fondessy will not take one drum. ERCS presently negotiating with CECOS. An additional alternative is local storage.

III. Future Plans

- A. OSC awaiting comments from State, CDC and City Health regarding their review of sampling results in preparation for final public meeting 6/26/84.
- B. MDDNR, Ron Gardner, to be on site 6/5/84 to discuss site stabilization plan and offer comments regarding proposed control structures contained within.
- C. 6/5/84, installation of berms/ditches to commence as per site stabilization plan to prevent off-site migration and erosion as natural site grades warrant the construction of these controls.
- D. ERCS to further demobilize on-site equipment and personnel.

Robert E. Caron, OSC
U.S. EPA Region III

Mark Cox
MD State Project Manager

AR400896

POLREP #29 - Kane & Lombard Streets Drum Site
Baltimore, MD
CERCLA Immediate Removal Project

I. Situation (1700 hrs., June 9, 1984)

- A. By COB 6/5/84 846 trucks delivered topsoil to site. Approximately 12,000 cubic yards of topsoil delivered.
- B. At 1730 hrs. 6/5/84, MDDNR (Ron Gardner) arrived on site to review site stabilization proposal. Upon tour of site Mr. Gardner concurred with present proposal and agreed that no amendments were necessary.
- C. Site demobilization 6/6/84 and 6/7/84. All ERCS trailers and equipment removed from site. Final demobilization occurred 6/8/84 when all personnel departed site. However, State of Maryland, MDWMA, personnel will remain on scene for two more weeks.
- B. Personnel on scene: State - 2, USCG/AST - 1, City - 1, TAT - 1, ERCS - 4.
- C. Estimated extramural costs to date:

<u>Contractor</u>	<u>Costs</u>	<u>Ceiling</u>
ERCS	\$490K	\$500K
State	32k	50k
USCG/AST & TAT	37k	50k
Total	\$559K	\$600K

II. Actions Taken

- A. Water samples from truck decon. netted results indicating contamination by toluene at 3 ppm. OSC contacted ERT on feasibility of spraying water back onto site. MDWMA and ERT concurred. Air monitoring downwind was performed during spraying operations.
- B. Draft of OSC report being prepared by TAT.
- C. Remaining PCB drum has been removed and will be stored temporarily at an approved hazardous waste storage facility (TRI) to be later transported and disposed at SCA.
- D. On 6/7/84, MDWMA completed the installation of 2 more monitoring wells off site and upgradient.
- E. Hydroseeding has been completed.

III. Future Plans

- A. MDWMA will provide 1 person to be on site for the next 2 weeks to monitor site conditions.
- B. Final public meeting scheduled for 6/26/84 at nearby Paterson High School.
- C. CDC, State and City Health to discuss citizen health concerns in preparation for public meeting.

Robert E. Caron, OSC
U.S. EPA, Region III

AR400557

Kane & Lombard Streets Drum Site
Baltimore, MD
CERCLA Immediate Removal Project

I. Situation (1000 hrs., June 28, 1984)

- A. At 1930 hrs., June 26, 1984, a public meeting was held at Patterson High School. Approximately 70 persons were present. Officials from representative agencies at the meeting included: Robert E. Caron, EPA/OSC; Ron Nelson, State of Maryland; C.J. Walters, EPA/Public Health Advisor; Harold Yates, EPA/OPA; R. Dean Kenderdine, Office of Congressman Mikulski; 4 press agencies; approximately 50 community leaders, members.
- B. 1400 hrs., 6/26/84, OSC, State, TAT, City personnel, inspected site to assure stability. It was observed that the seed has begun to germinate. At time of site visit, 17 days had passed since laying of seed. Hydroseeding firm proposes all seed to germinate and provide adequate cover within 10-20 days.

II. Actions Taken

- A. Site representatives summarized for community the site activities and future plans. OSC helped public to better understand how the remedial program works and how it is tied in with the emergency program.
- B. State of Maryland, Ron Nelson, stated that will continue to monitor site and report any changes in site conditions.
- C. Dr. Susan Guarniere, Baltimore Health Department, stated to public that the Baltimore Health Dept. will address the citizens' health concerns by:
 - 1) Finding physicians for all concerned persons;
 - 2) identify chemicals found on site and express to individuals the potential dangers and under what conditions they may exist;
 - 3) characterize chemicals found on site and identify their everyday use.
- D. CDC representative (C.J. Walters) assured community persons present at meeting that there was no cause for concern and CDC did not see the need for recommending medical screening.
- E. TAT approximately 80% complete with preparation of written draft of OSC report.

ARL00398

POLREP #30 - FINAL

Kane & Lombard Streets Drum Site
Baltimore, MD
CERCLA Immediate Removal Project

Page Two

III. Future Plans

- A. State to rank site under their own legislation similar to Superfund.
- B. Baltimore Health Department to continue to address citizens' concerns and examine any individuals who request medical screening.
- C. State of Maryland to monitor site for any changes in present conditions.
- D. OSC awaiting results of samples from Contractural Laboratories. They are 7 days overdue.

Robert E. Caron, OSC
U.S. EPA, Region III

AR400399

APPENDIX E

SITE SAFETY PROTOCOL
EVACUATION PLAN
OPERATIONAL CODES

AR400400

171 Kane & Lombard Streets Read & SIGN on Back

SITE/SAFETY PROTOCOL

May 4, 1984

Kane & Lombard Streets Site
Baltimore, Maryland

CERCLA Immediate Removal Project

GENERAL

This protocol addresses the safety procedures that will be followed by any and all personnel visiting the site or involved in the CERCLA removal activity at Kane & Lombard Streets. All personnel entering the site shall read and sign this safety plan. The protocol will remain in effect until the OSC certifies that the activity is terminated. It does not supercede any Federal OSHA or State or local regulations but is in addition to them. In the event of a conflict between this protocol and a regulation, the more stringent of the two will be in force. The protocol is in accordance with and refers to the terminology used in the Office of Emergency and Remedial Response (OERR), Interim Standard Operating Safety Procedures.

Since data available at the present time does not allow a complete characterization of the barrelled waste on the site, levels of protection for personnel will be set in accordance with the hazard of the job function and location on-site as indicated on the attached diagram.

Respiratory Protection Program

All contractor and governmental personnel involved in on-site activities shall have a written respiratory protection program and prove that they are physically fit to wear a respirator. All personnel wearing air-purifying respirators on-site are required to be fit tested, while those wearing pressure-demand self-containing breathing apparatus or air-line apparatus, must be properly trained and experienced in their use. All respiratory protection equipment is to be properly decontaminated at the end of each workday.

Persons having beards or facial hair must not wear a respirator.

Training and Medical Monitoring Program

Personnel will have either formal training or on-the-job training for those tasks they are assigned to perform on the active site. All unfamiliar activities will be rehearsed beforehand.

All contractor and governmental personnel who are exposed to hazardous levels of chemicals shall prove that they are enrolled in a medical monitoring program.

AR400401

General Safety Rules and Equipment

- a. There will be no eating, drinking or smoking in the Exclusion Area or hot side of the Contamination Reduction Area.
- b. All personnel must pass through the Contamination Reduction Area to enter The Exclusion Area.
- c. An emergency eye wash will be on the hot side of the Contamination Reduction Area.
- d. As a minimum, an emergency deluge shower/spray can is to be located on the clean side of the Contamination Reduction Area.
- e. At the end of the work, all personnel working in the Exclusion Area shall take a hygienic shower.
- f. All supplied breathing air shall be certified as Grade D or better.
- g. Where practical, all tools/equipment will be spark proof, explosion resistant and/or bonded and grounded.
- h. Fire extinguishers will be on-site for equipment or personnel fires only.
- i. Since site evacuation may be necessary if an explosion, fire, etc., occurs on-site, and individual shall be assigned to sound a horn. For example, the evacuation signal may be two long blasts every 30 seconds until all personnel are evacuated and accounted for. This procedure will be reviewed at each morning's safety meeting.
- j. A first-aid kit will be on-scene at all times during operational hours. An oxygen inhalator respirator and a qualified operator will be available. The location of these items on-site will be posted.
- k. Persons having beards or facial hair must not wear respirators.
- l. No parking of non-essential vehicles inside of the fence line will be permitted since safety lanes may be obstructed.
- m. No work will be performed in the exclusion area during hours of darkness as determined by the site safety officer.

Morning Safety Meeting

A morning safety meeting will be conducted each day for all site personnel who sign a daily attendance sheet. The safety procedures, evacuation procedures, and escape procedures, as well as the day's planned operations, should be discussed.

ARL00402

CONTROL AT THE SITE

Access to the site will be restricted by a continuous chain link fence installed during the immediate removal phase at this site and exit from the site shall be through the gate in the chain link fence except in a life-threatening emergency.

All persons entering the site shall sign in and out at the OSC command post.

DESIGNATION OF WORK AREAS AT THE SITE

The entire site will be divided into three areas: (1) Exclusion Area which known to be or have a potential for becoming contaminated; (2) the Contamination Reduction Area where decontamination of personnel and equipment exiting the Exclusion Area is performed; (3) the Support Area which is not contaminated.

The Exclusion Area (EA)

At the Kane & Lombard Sts. Site, the Exclusion Area shall initially include all areas inside the chain link fence.

The Contamination Reduction Area (CRA)

At the Kane & Lombard Sts. Site, the Contamination Reduction Area will be located immediately outside the access gate and will be delineated by roped off area.

The Support Area (SA)

At the Kane & Lombard Sts. Site, the Support Area will be the area outside chain link fence not roped off.

Changes in Designation of Work Areas

As work progresses on-site, the OSC may determine that an area previously designated an EA is no longer classified in that manner. It is not intended, however, to change the designation of the CRA since this may involve the movement of the decontamination facilities and added expense.

SAFETY PROCEDURES AND LEVELS OF PROTECTION

Exclusion Area

1. All personnel shall enter and exit the Exclusion Area through the Contamination Reduction Area.
2. Emergency escape routes from the Exclusion Area will be established and reviewed as appropriate at each morning safety meeting.

ARL000403

SAFETY PROCEDURES AND LEVELS OF PROTECTION (continued)

Exclusion Area

3. All personnel in the Exclusion Area shall use the protective equipment designated for their job function but in no case shall less than LEVEL C be used.
4. Personnel performing the following job functions in the Exclusion Area will utilize the designated level of protection equipment.

Prime Contractor

- a. Barrel handling, including opening, sampling, pumping, moving, emptying, or any direct or indirect disturbance of a full-barrel will be performed in Level B. This applies to anyone involved, including equipment operators.
- b. Excavation operations will be performed in Level B.
- c. Soil removal operations will be performed in Level B due to the possibility of uncovering volatile materials.

Contamination Reduction Area

1. Personnel and equipment decontamination will be performed in Level C.
2. All personnel entering the CRA will utilize a minimum of Level C protection.
3. All personnel entering the CRA to decontaminate will employ Level C.
4. All equipment entering the CRA must be decontaminated prior to leaving the CRA.

Support Area

1. No contaminated equipment or personnel may enter the Support Area.
2. Except in the case of a release of a Toxic vapor, Level D will be appropriate for all personnel in the Support Area.

Support Area (continued)

4. Emergency escape routes and procedures for the SA will be established and reviewed as appropriate at each morning safety meeting.

DECONTAMINATION PROTOCOL

All equipment and personnel entering the site must be thoroughly decontaminated prior to leaving. Since there are various protocol and equipment available for this purpose, the OSC will determine if the proposed decontamination techniques are applicable. Such determinations will be made on a day-to-day basis as on-site operations dictate.

ON-SITE AIR MONITORING

Since Level B protection appears to be applicable, an air monitoring program is necessary.

Total vapor/gas air monitoring will be conducted daily with the photoionizer/OVA. The number of sampling stations and location will vary with atmospheric conditions. Generally, total vapor/gas readings will be taken at ground level, breathing zone, and near the surface of the suspected hazardous waste. Sample stations will be within the suspected contaminated area as well as downwind near the property line.

After defining those site locations which have the highest total vapor/gas readings, personnel monitoring pumps with carbon/Tenax thermal desorption tubes will be run in those areas. The type of collection pumps, media, and flow rates will vary. The initial set-up, however, will consist of a personnel monitoring pump, Tenax thermal desorption tubes with backup tubes operating at 100cc/min, for sufficient time to pull a minimum of 5 liters per sample. Initially, AM and PM samples will be collected to establish a base line of data. Sample stations will be within the suspected contaminated area as well as downwind and upwind near the property line.

If contaminants are revealed at the above mentioned sampling stations on the field GC (Century OVA w/Thermal Desorber), additional personnel monitoring pumps will be run with those containing the Tenax thermal desorption tubes. Initially, the additional collection tubes used will be the 100 mg and 600 mg carbon collection tubes pending suspected concentration. Initial collection rate will be 2 liters per minute with a minimum volume of 10-15 liters taken. These samples will be analyzed off-site following the NIOSH Organic Solvents in Air Method No. P&CAM 127 as closely as possible with the option for further GC/MS analysis, if necessary.

Additional air sampling will be dependent on the data obtained from this sampling scheme.

Site Safety Protocol
Kane & Lombard Streets Site

Page 6

EMERGENCY PROCEDURES

In the event of a medical or other emergency, the OSC or his designee will notify the appropriate authority. The following list of phone numbers will be posted prominently at each telephone on-site:

1. Fire (301) 685-1313
2. Ambulance (301) 396-1111
3. Police (301) 222-3333
4. Federal Government (214) 597-9898
5. State Government (301) 389-4900, (301) 243-8700 (after hours)
6. County/City Government _____
7. EPA Environmental Response Team (201) 321-6741
8. Hospitals Baltimore City Hospital, Eastern Avenue
Emergency No. 396-9350
9. BALTIMORE COUNTY POLICE COMMUNICATIONS CENTER: 337-2222

AR400406

SITE LOCATION - ▽
AND ROUTE TO BALTIMORE
CITY HOSPITAL EASTERN AVENUE



212

21231

21224

AR 400 407

Kane and Lombard Street Drum Site, Baltimore, MD

Industrial

North

Memorial Hospital

1/4 mile

(8.5 acres)

Lombard

Drums

Drum



400'

Kane

Patterson High School

Residential

ARL00608

U. S. COAST GUARD
 POLLUTION CONTROL ACTIVITY ADDITIONAL INFORMATION LOG

UNIT: ATLANTIC STRIKE TEAM INCIDENT: Delt. Drum Site
 SE NO: 026-84 DATE: 09 MAY 84 PAGE . OF

ADDITIONAL INFORMATION

AGENCY	NAME OF CONTACT	TELEPHONE NUMBER
TAT	Justin J.N. Motwani	(609)-663-7995
OHM	Tom Price	800-338-4508
OHM	Bil Bremer	"
OHM	Bruce Kish	"
OHM	David Price	"
OHM	[Signature]	"
OHM	[Signature]	"
OHM	James J. Glinas	"
OHM	William [Signature]	834-1000
OHM	Frank Holcomb	"
OHM	Monty Mehard	"
CDC	Edmund [Signature]	404 452 4100
CDC	Erin [Signature]	408-452-4152
"	Barbara [Signature]	215-397-7171
MD. CEP	M. [Signature]	385-6650
B.C. GLAST	Jenny [Signature]	919-338-1100
BCFD	[Signature]	(301) 396-5756
TAT	[Signature]	(609) 663-7995
TAT	[Signature]	" " "
South City Health Dept	[Signature]	396-4428
U.S. Coast Guard	[Signature]	
MD - DEP - WMA	[Signature]	301-727-4753
MD - DEP - WMA	Ron Nelson	383-3102
MD - DEP - WMA	David [Signature]	727-4453
Coastal Commission	[Signature]	301-302-4425
USCG AST	[Signature]	"
Highland Fence Co.	[Signature]	301-327-1211
OHM	Michael H. Barrett	800-338-4508
OHM	Timothy [Signature]	" " "
OHM	Gregory P. [Signature]	" " "

U. S. COAST GUARD
 POLLUTION CONTROL ACTIVITY ADDITIONAL INFORMATION LOG

TITLE: _____ INCIDENT: _____

FILE NO: _____ DATE: _____ PAGE _____ OF _____

ADDITIONAL INFORMATION

AGENCY	NAME OF CONTACT	TELEPHONE NUMBER
Longhorn Inc.	Chris Powell	233-2808 - 947-1997
OHM - Dept of Health -	Walter Edwards -	
OHM	Jim Adkins	
EPA	James [unclear]	224-2740
DEP - WMA	George Saberg	727-4753
GP - [unclear]	[unclear]	343 6637
OHM	Frank Reynolds	834-1000
DEP - WMA	Ron Reifler	3836650
OHM	TOM SETH	419 423 3521
OHM	Michael Edelbrock	800-338-4503
Western	Mavis Sanders	523-4585
Western TAT	Gerard M Kelly	202-642-7900
EPA	Carol Olschick	597-9898
EPA	Vivienne Williams	597-0803
EPA	Jose Malsugar	597-0807
EPA	Alva Brander	597-8131
EPA	Tom Connell	202/382-3205
EPA	Steve Rutley	202/475-8221
EPA	John C. Cantor	202-382-3168
Booz-Allen/EPA	Julia Alfano	301 951-4749
Booz-Allen	Janice Wynan	301 951-4750
EPA-HQ	(Allen) Ann [unclear]	800-475-8109
KSCG AST	William [unclear]	919-338-1100
[unclear]	Bill [unclear]	656-4 [unclear]
16th Nursing Agency	Anita Warren	837-2076

Site Safety Protocol
Appendment A

Kane and Lombard Streets Drum Site
Immediate Superfund Project
Baltimore, Maryland

SAFETY PROCEDURES AND LEVELS OF PROTECTION

Weather and Heat Stress

Adverse weather conditions are important considerations in planning and conducting site operations. Hot or cold weather can cause physical discomfort, loss of efficiency, and personal injury. Of particular importance is heat stress, resulting when protective clothing decreases natural body ventilation. The following recommendations will help reduce heat stress:

1. Provide plenty of liquids. To replace body fluids (water and electrolytes) lost due to sweating, use a 0.1% salt water solution, more heavily salted foods, or commercial mixes. The commercial mixes may be preferable for those employees on a low-sodium diet.
2. Provide cooling devices to aid natural body ventilation. These devices, however, add weight, and their use should be balanced against worker efficiency. Long cotton underwear act as a wick to help absorb moisture and protect the skin from direct contact with heat-absorbing protective clothing. It should be the minimum undergarment worn.
3. Install mobile showers and/or hose-down facilities to reduce body temperature and cool protective clothing.
4. In extremely hot weather, conduct nonemergency response operations in the early morning or evening.
5. Ensure that adequate shelter is available to protect personnel against heat, cold, rain, snow, etc., which can decrease physical efficiency and increase the probability of accidents.
6. In hot weather, rotate shifts of workers wearing impervious clothing.

Heat Stress Monitoring

Due to the time of year, a strict Heat Stress Monitoring Program will be in effect during all working hours. Personnel will be subject to the following monitoring program:

For monitoring the body's recuperative ability to excess heat, one or more of the following techniques will be used as a screening mechanism. Monitoring of personnel wearing impervious clothing should commence when the ambient temperatures increase or as slow recovery rates are indicated. When temperatures exceed 85°F, workers should be monitored for heat stress after every work period.

1. Heart rate (HR) should be measured by the radial pulse for 30 seconds as early as possible in the resting period. The HR should be measured by the radial pulse for 30 seconds as early as possible in the resting period. The HR at the beginning of the rest period should not exceed 110 beats per minute. If the HR is higher, the next work period should be shortened by 10 minutes (or 33%), while the length of the rest

ARL00411

Heat Stress Monitoring (Continued)

period stay the same. However, if the OT exceeds 99.7°F at the beginning of the next period, the following work cycle should be further shortened by 33%. OT should be measured again at the end of the rest period to make sure that it has dropped below 99°F.

3. Body water loss (BWL) due to sweating should be measured by weighing the worker in the morning and in the evening. The clothing worn should be similar at both weighings; preferably the worker should be nude. The scale should be accurate to plus or minus 1/4 lb. BWL should be instructed to increase his daily intake of fluids by the weight lost. Ideally, body fluids should be maintained at a constant level during the work day. This requires replacement of salt lost in sweat as well.
4. Blood pressure before and after each work period will be monitored.
5. Good hygienic standards must be maintained by frequent change of clothing and daily showering. Clothing should be permitted to dry during rest periods. Persons who notice skin problems should immediately consult medical personnel.

Effects of Heat Stress

If the body's physiological processes fail to maintain a normal body temperature because of excessive heat, a number of physical reactions can occur ranging from mild (such as fatigue, irritability, anxiety, and decreased concentration, dexterity, or movement) to fatal. Standard reference books should be consulted for specific treatment.

Heat-related problems are:

- Heat Rash: caused by continuous exposure to heat and humid air and aggravated by chafing clothes. Decreases ability to tolerate heat as well as being a nuisance.
- Heat Cramps: caused by profuse perspiration with inadequate fluid intake and chemical replacement (especially salts). Signs: muscle spasm and pain in the extremities and abdomen.
- Heat exhaustion: caused by increased stress on various organs to meet increased demands to cool the body. Signs: shallow breathing; pale, cool, moist skin; profuse sweating; dizziness and lassitude.
- Heat Stroke: the most severe form of heat stress. Body must be cooled immediately to prevent severe injury and/or death. Signs and symptoms are: red, hot, dry skin; no perspiration; nausea; dizziness and confusion; strong, rapid pulse, coma.

Heat Stress Miscellaneous

1. All personnel working on the site in Level C and Level B wearing impervious clothing will drink at least 8 oz. of cold fluids following each work period. The fluids should be something other than water and should not contain caffeine.
2. Any personnel that according to the "Heat Stress Monitoring Program" have not fully recovered will not be permitted to return to on-site work until such a time that the person qualified to make this judgement (EMT or equivalent) determines that an individual can return to site work.
3. Any personnel that feels he is displaying any effects of heat stress that may not be known to the medical monitoring personnel, will report these immediately.

EMERGENCY EVACUATION PLAN

Lombard and Kane Streets Cleanup Site

I. Areas of Potential Evacuation

A. 1/2 mile radius of cleanup site

B. Residential areas:

*	Joplin Street	300-400 Blocks
*	Imla Street	" "
*	Hornel Street	" "
*	Gusryan Street	" "
*	Kane Street	" "
**	Eastbrook Street	5800 Block
**	Gough Street	" "
**	Conley Street	" "
**	Bank Street	" "
**	Baltimore Street	" "
**	Bank Street	" "
**	Pembroke Street	300-400 Blocks
**	Quinton Street	" "

C. Schools (To be notified by land line)

*	Patterson High School - 100 N. Kane St.	396-9276
*	Our Lady of Fatima School - 6400 E. Pratt St.	633-5882

D. Business Areas (Evacuees to provide own transportation)

- 1- North Point Road between Eastbrook and Erdman Ave.
- 2- Lombard Street from site to 5500 block Lombard St.

E. Baltimore City Hospital

- 1- To be notified by land line 396-9110 or 396-9350
- 2- Not to be evacuated - will close all windows and shut down air handling systems.

II. Evacuation Center

A. Southeast Middle School (PS 255) - 6815 Fair Avenue

B. For transportation of evacuees, contact Civil Defense Duty Officer at 396-3100

AR4004:14

III. Traffic Coordination

- A. BCPB will coordinate implementation of strategic roadblocks

IV. Implementation of Evacuation

- A. Southeastern Police District Commander at 396-2422 or 222-3333
- B. Fire Communications, 911 or 316-5686
- C. Captain James Henry 316-5686 (Pager #107)
316-5686 (Home)

* Evacuees to muster on Eastern Avenue between Kane and Gusryan Street

** Evacuees to muster at Eastwood Recreation Center

AR400615

POLICE DEPARTMENT
BALTIMORE, MARYLAND

Kene & Lombard Sts. Site
Baltimore, Maryland

OPERATIONAL CODES

CODE DESIGNATIONS

1. Green - Normal Operations
2. Yellow A - State official making evacuation decision advised EPA/OSC to be on standby, and termination of work on site because of the following conditions:
 - a. 10 ppm or greater continuous readings leaving the immediate work area (measured 10 - 20 ft. from point of release).
 - b. Control measures implemented on site are presently ineffective.
 - c. Current or projected meteorologic conditions indicate a possible impact on inhabited areas.
3. Yellow B - State official making evacuation decision advise by EPA/OSC to advise residents and Patterson High School students and faculty in the area to remain indoors with windows and doors closed; and to have police restrict access into the potentially impacted area because of:
 - a. Continuous readings of 2 ppm or greater at site perimeter.

NOTE: If continuous readings at site perimeter are 2 - 4 ppm, arrangements for relocation should begin.
4. Red - State official making evacuation decision will be advised by EPA/OSC to implement temporary relocation plan because of 5 ppm or greater continuous readings in the nearest inhabited area with no relief in the immediate future.

AR400016

APPENDIX F
PHOTOGRAPHS

AR400417



PHOTOGRAPH 1: Damaged and burnt drum area,
west side of site.



PHOTOGRAPH 2: Damaged and burnt drum area,
center of site.

ARL00018



PHOTOGRAPH 3: Ball fields adjacent to east
side of site.

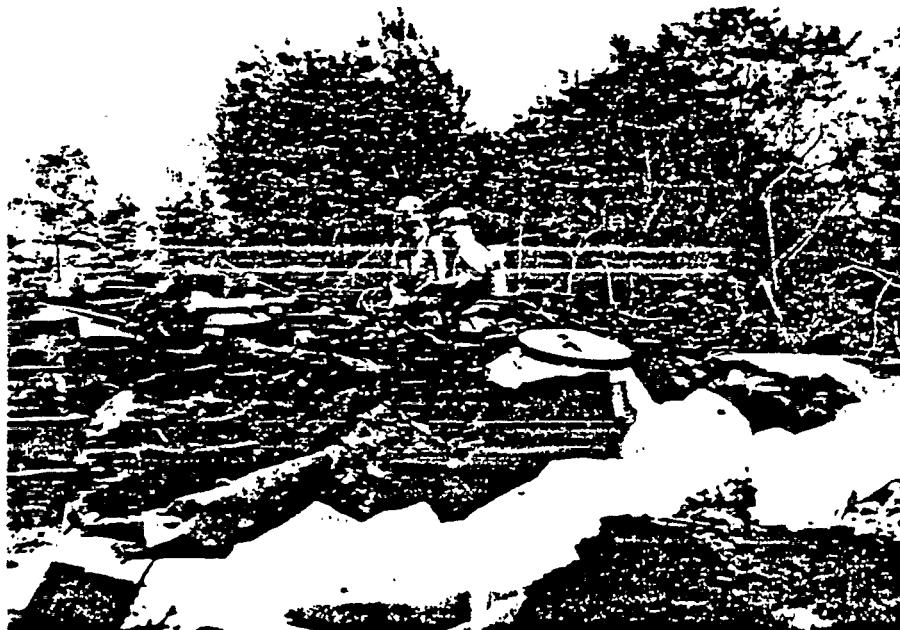


PHOTOGRAPH 4: East side of site--Patterson
High School in southeastern
corner.

ARL 00419

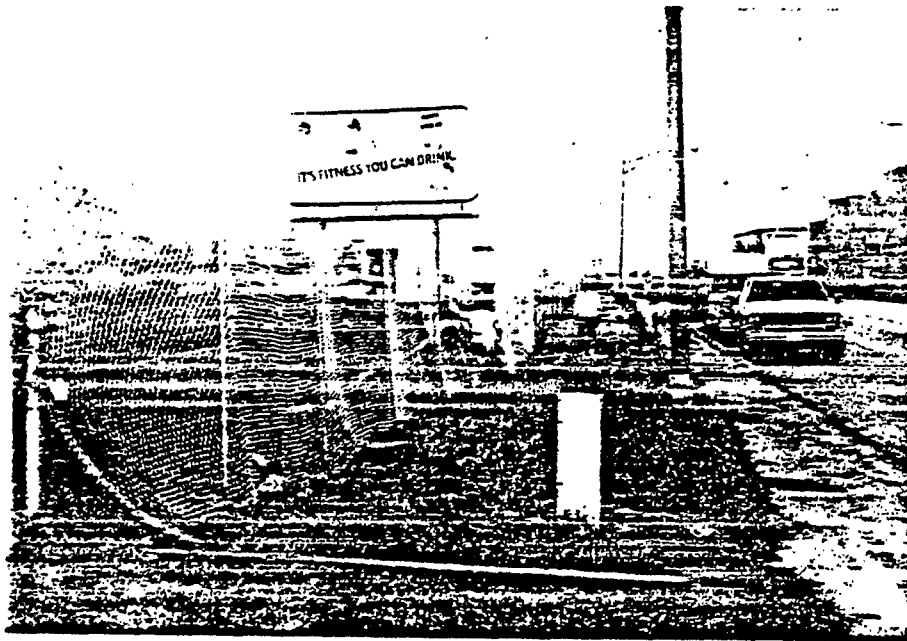


PHOTOGRAPH 5: Site assessment--HNU probing.



PHOTOGRAPH 6: Sampling for compatibility study.

AR400420



PHOTOGRAPH 7: Fence installation.



PHOTOGRAPH 8: Support area - on-site air lab on right.

AR400421

AR400423

News
from

CONGRESSWOMAN BARBARA

Mikulski
3rd District of Maryland

407 Cannon Building
Washington, D.C. 20515
(202) 225-4016

1414 Federal Building
Baltimore, Maryland 21201
(301) 952-4510

FOR MORE INFORMATION CONTACT:
Jim Abbott 202/225-4016

MIKULSKI JOINS STATE AND LOCAL HEALTH OFFICIALS
IN ARRANGING FOR CLEAN UP OF BURIED TOXIC WASTES

BALTIMORE, Md., May 7, 1984 -- At a morning news conference here today, Third District Congresswoman Barbara A. Mikulski lent her support to state and local health officials involved in cleaning up the latest buried toxic wastes which threaten the health and safety of Baltimore residents.

The news conference was called to announce that recently discovered drums buried in a vacant lot in the vicinity of Kane and Lombard streets in Baltimore contained toxic materials.

"My office in Washington was notified of the contents of the buried drums last Thursday morning, May 3rd," said Ms. Mikulski. "I immediately telegraphed the Environmental Protection Agency to request that they expedite the state's request for Superfund money to remove the buried substances."

Congresswoman Mikulski told reporters and neighborhood residents this morning that the EPA immediately agreed to her request and that \$710,000 has been appropriated for the clean-up effort.

Ms. Mikulski pledged that she will work to ensure that the federal government carries out its responsibility in cleaning up the hazardous wastes.

AR100624
more

She further told the community leaders that she will work to keep them fully informed about everything that is being done to assure their health and safety.

Congresswoman Mikulski is a member of the Energy and Commerce Committee which has Congressional jurisdiction for the Superfund program.

COMMUNITY MEETING

MONDAY, MAY 7, 1984

7:00 p.m.

Patterson High School

Federal, State and Local officials will answer your questions about a hazardous waste cleanup project located at Kane and Lombard Streets.

For further information, call 383-6650.

AR400426

Region 3
801 & Washington Streets
Philadelphia, PA 19106
215-597-9825

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Agency EPA 335



EPA

Environmental News

Contact: Janet Luffy
(215) 597-9825
84-55, May 7, 1984

FOR IMMEDIATE RELEASE

EPA BEGINS IMMEDIATE REMOVAL OF DRUMS AT KANE AND LOMBARD STREETS SITE IN BALTIMORE

PHILADELPHIA, PA -- The U.S. Environmental Protection Agency (EPA), with the assistance of the State of Maryland Department of Health and Mental Hygiene, Office of Environmental Programs, will begin the immediate removal of hazardous substances from a former, dump site southwest of the intersection of Kane and Lombard Streets in Baltimore. The 8.3 acre site is directly adjacent to Patterson High School and within one quarter mile of Baltimore City Hospital. The work which will take approximately 30 days to complete has a projected cost of \$710,000.

An estimated 1000 drums in various stages of deterioration are strewn about the area, on the surface and partially buried. Many drums appear to contain paint wastes. Several drums contained solvents and yielded explosive readings when tested. Firefighters reported explosions during a recent fire reportedly started by vandals. People have been observed smoking at the site.

Commenting on the timing of the EPA response, EPA Regional Administrator Thomas P. Eichler said, "It is necessary that EPA proceed expeditiously to stabilize this site by removing these hazardous wastes and volatile substances."

Adele Wilzack, Secretary of Health and Mental Hygiene, said, "I am pleased with EPA's rapid response to Maryland's request for immediate removal action to alleviate a potentially dangerous situation. We anticipate full coordination among EPA, the Department, the City of Baltimore and the community toward successfully completing this cleanup project."

AR400427

- more -

A four-phased approach will be used during the cleanup:

- Phase I - Security - The site will be secured by erecting a security fence.
- Phase II - Assessment - Assessment of the site will include sampling the drums, soils and water.
- Phase III - Removal and Disposal of Surface Drums Shown to Contain Hazardous and Toxic Substances - This phase to be conducted concurrent with Phase II.
- Phase IV - Restoration - Backfill, regrade, topsoil and hydroseed to assure site stability to prevent the development of future environmental problems.

In August of 1983, the State of Maryland inspected the site and issued a Complaint Order to the landowner requiring cleanup. Because the work was not done, Maryland requested EPA's assistance through Superfund. This fund was established by Congress under the Comprehensive, Environmental Response, Compensation and Liability Act of 1980.

Previous sampling by the Maryland Office of Environmental Services indicated the presence of such volatile organics as toluene and xylene, heavy metals such as chromium and chlorinated organics.

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AR400428

Toxic wastes found near Patterson High are due U.S. cleanup

By Douglas Birch
Evening Sun Staff

State and federal officials said today they will launch an immediate cleanup of an abandoned dump site adjacent to Patterson High School in East Baltimore that contains a variety of toxic, flammable and suspected cancer-causing chemicals.

Ronald Nelson, of the state Waste Management Administration, said high-school students sometimes use the 8.3-acre vacant lot, located southwest of the intersection of Lombard and Kane streets, as a shortcut, and that some have been seen smoking there. "We felt we should take immediate action," Nelson said.

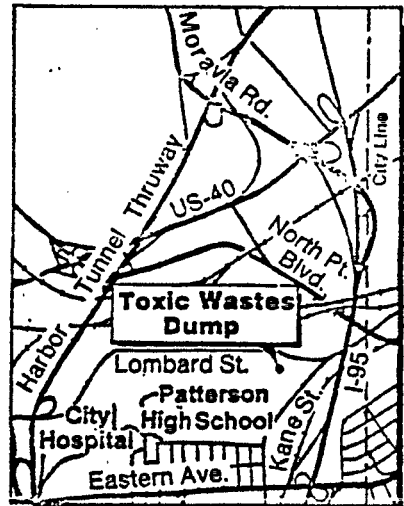
At a press conference this morning, Nelson said the state discovered three years ago that at least some

dumping of chemicals had occurred at the site.

But state officials decided to appeal to the federal Environmental Protection Agency for immediate action after a small brush fire Feb. 22 and later erosion uncovered an estimated 1,000 drums of liquid waste.

Nelson said the chemicals found on the site, which is within a quarter mile of City Hospital, included degreasers, paints and solvents.

The EPA has allocated \$710,000 in Superfund money for the cleanup, which is expected to take one to two months. It is the sixth cleanup launched in the state under the \$1.6 billion Superfund program, financed mainly by taxes on the chemical industry.



See FUND, A7, Col. 1

The Evening Sun

THE EVENING SUN

MONDAY MAY 7, 1984

PAI

AR4:00629

Page 1002

Toxic dump to get cleaned

FUND, From A1

The drums are scattered among construction debris, abandoned appliances and household trash dumped illegally, he said, adding the EPA had launched a criminal investigation to try to find who is responsible for the waste dumping.

Edward Azrael, a Baltimore attorney, said today he, his wife, and the widow of a former partner own the property. He said he and his partners bought the industrially zoned land in 1962, and that he has never been aware of any dumping of hazardous wastes.

"I had no knowledge that the drums were there and did not participate in any manner in placing them there," he said.

Nelson said the state first discovered the dumping at the site in 1980, and began drilling test wells and taking other measures to find the extent of the contamination before the owners barred technicians from the site in May 1982.

At that point, Nelson said, the state filed an administrative action which has "languished" through the hearing process over the past year.

Azrael called Nelson's statement "an absolute lie. We have never barred the state from it . . . We have allowed the state to do anything it wanted on that property."

Nelson said groundwater samples taken in late April showed the presence of toxic and highly flammable chemicals, which could either poison those who come in contact with them, or could explode.

Robert Caron, on-site coordinator for the EPA, said the state has no reports of injuries or health problems linked with the dump site. Adele Wilzac, Secretary of Health and Mental Hygiene, said there was "no immediate danger" to area residents.

Caron said there was "quite a cookbook" of chemicals found at the site, including xylene, toluene and other substances. He said some, all chlorinated organic compounds, were suspected of causing cancer.

The drums were "in the worst shape I've seen," said Caron, describing them as crushed, rusted and full of holes. Some were intact, though, and were still filled with chemicals.

Caron said the cleanup was expected to begin tomorrow morning, when workers outfitted with airpicks

and white suits will be fenced around the property.

Then, after research photographs and other federal and city officials assess the extent of the site, said. The dumping began after the site, a form filled in with soil during construction of I-95 in or early 1960s, he said.

He said area residents have told health officials at the site.

Francis Z. Thomas, Patterson High School, unaware that drums were in the area of land.

Sum

AR:00430

Page 2

Hazardous waste site: 'It scares me'



Special to The News American - Joseph Kohl
NEIGHBORHOOD MEETING: Norman Shawe complains to officials during a meeting Monday night to discuss the toxic waste dump.

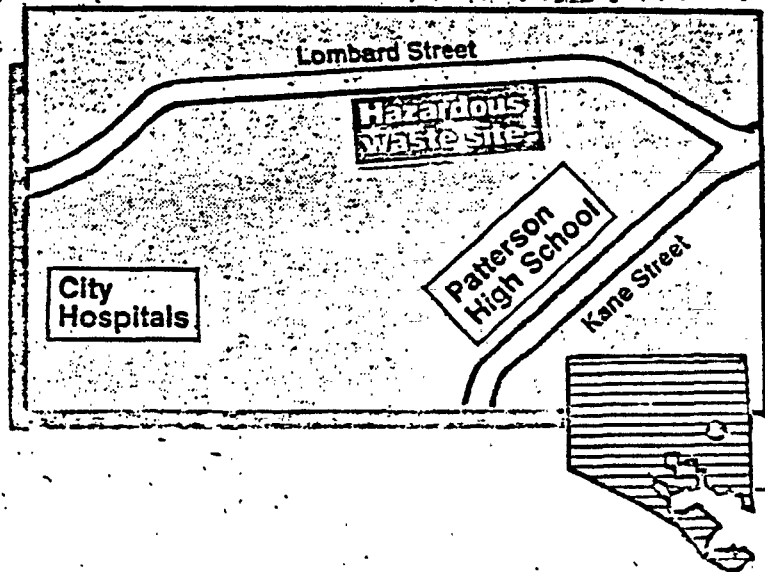
Neighbors say many used lot

By Vesta Kimble
News American Staff

For the past five years, James Makowiecki has trampled on an east Baltimore lot that today is being fenced off as a hazardous waste site.

Makowiecki, 17, a sophomore at Patterson High School, said he has looked for snakes and toads under rusty drums at the wooded lot behind the school. And usually, after less than an hour, he would leave because of a headache.

"It scares me. Am I going to get a disease today, tomorrow? I didn't know what the drums had in them. I thought they were just



See WASTE, 8A

Drums near Patterson under probe

151 E. from 1A

... day.
 ... telling his story to
 ... federal health officials, who
 ... Monday that they have
 ... an emergency \$710,000
 ... effort at the 8-acre site in the
 ... of E. Lombard St., near the
 ... of Kane and Lombard

... meeting in the neighbor-
 ... Monday night, other residents
 ... the lot was frequented by many
 ... from teenagers riding motor-
 ... and Boy Scouts gathering fallen
 ... s, to Patterson High stu-
 ... who cut across the property on
 ... daily trek to school.

... health officials estimate that
 ... 1,000 metal drums, now cor-
 ... are scattered throughout the
 ... above and below ground.

... drums contain residue of
 ... and cleaning solvents that
 ... be dangerous if inhaled or
 ... d, officials said. In addition,
 ... the chemicals could "act like a
 ... if ignited, they said.

Monday, no one could say how
 ... the drums have been there, or
 ... ut them there. The officials,
 ... er, agreed that whoever dis-
 ... ed of them did so illegally.

Many of the 150 people who at-
 ... Monday night's meeting in
 ... terson High auditorium were
 ... ry that state health officials have
 ... aware since 1980 that the drums
 ... ned potentially hazardous
 ... cals, yet did not announce it
 ... ically until Monday morning.

Ronald Nelson, director of the
 ... waste-management adminis-
 ... n, apologized for the delay and
 ... d other dump sites around the
 ... te "took priority."

... there is no reason for delay. I
 ... money should not count and
 ... rminent threat should not
 ... nt. Unfortunately, many times we
 ... ced into that kind of process,"
 ... id.

... hat process involved an effort to
 ... suade the owner of the property,

attorney Edward Azrael, to clean up
 the drums. Last February, after a
 brush fire exposed more drums at the
 site, the state health department con-
 cluded that the site posed a "potential
 threat" to the surrounding communi-
 ty, which contains the high school,
 three housing developments and Bal-
 timore City Hospitals.

"I want to stress the word 'poten-
 tial,'" Robert Caron, an Environmen-
 tal Protection Agency official, told the
 audience. "This site poses a potential
 threat. But we'll make sure it's safe."

Azrael said he and a partner
 bought the land in 1962 with plans to
 develop it. But those plans fell
 through when his partner died. "I
 don't know if it's worth a dime now,"
 Azrael said.

He said he knew nothing about the
 drums until the state told him about
 them last November.

"I'd like to catch the dirty rotten
 people who put the drums on this
 land," he said.

Last week, the EPA sent samples
 from the drums to the Centers for
 Disease Control in Atlanta for test-
 ing. The results of those preliminary
 tests are expected late today.

More tests are needed to deter-
 mine if the waste contaminated the
 ground, the groundwater and the air
 around the site, officials said. And
 further tests will determine if the

substances are cancer-causing.
 Samples taken several years ago
 indicated the drums contained paint
 and cleaning solvents — such as to-
 luene and xylene — and heavy met-
 als such as chromium.

"In your opinion, would you let
 children play there, on the softball
 diamond?" one woman asked him.

"No," he answered.

"If anything happens to my son,
 I'm coming after you," the woman
 replied.

Caron said EPA workers would

start building a fence around
 today and will maintain
 guard until it is completed. The
 cleanup effort will take 30 to

THE NEWS AMERICAN

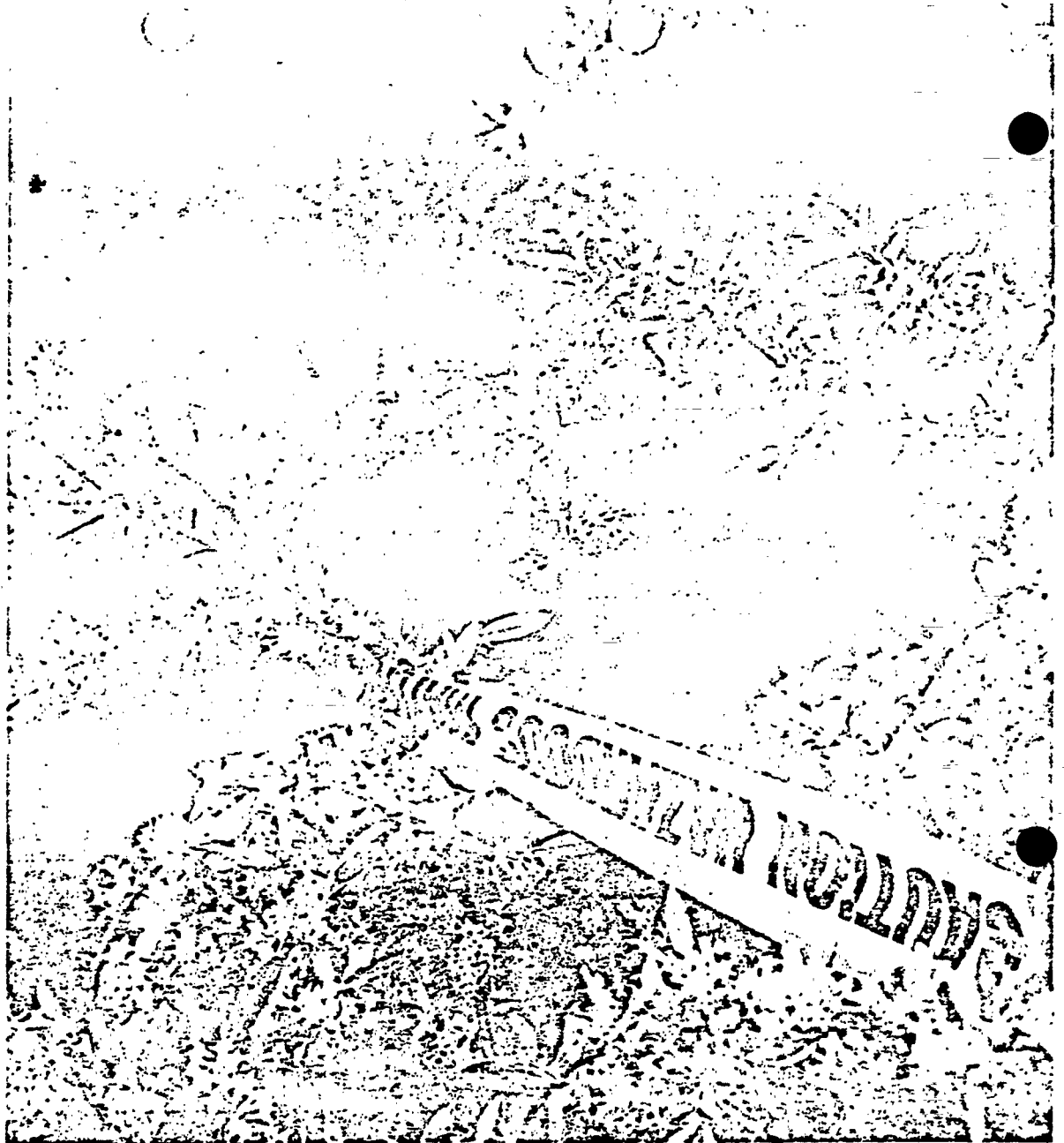
TUESDAY
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 MAY 8, 1984

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TUESDAY MAY 2, 1984

Pg 11

THE EVENING SUN



By Lloyd Pearson—Evening Sun Staff

Amid the spring shrubbery, a sign warns of hazardous wastes in a dump next to Patterson High School.

Site of toxic waste

Tests continue at dump

By Jenny Abdo
Evening Sun Staff

Fence construction and further tests for air quality and ground water contamination were expected today at a privately-owned dump site in East Baltimore, where more than 1,000 barrels, some containing toxic substances, were discovered.

The site, at the southwest corner of Kane and Lombard streets, was cordoned off with orange tape yesterday by officials from the U.S. Environmental Protection Agency after it was designated for federal-state cleanup with EPA Superfund money. It was the first of several steps to be taken during the next 30 to 60 days to clean up materials there.

The EPA has identified organic materials at the

8.3-acre dump that have polluted the ground water at the site, but officials said there is no immediate health threat to nearby residents. Residents use city water.

Samples taken from several drums last week were found to contain liquid toxic substances, including toluene and xylene, two flammable hydrocarbons often used in paint and dyes. Further test results were expected today.

Smoking by trespassers might cause an explosion, making it necessary to remove the materials quickly, officials said.

Ronald Nelson, chief of the state health department's Waste Management Administration, said last night the dump site is considered one of the most potentially dangerous ever found in Maryland.

See TOXIC, F2, Col. 1

AR 400433

Tests, precautions taken at toxic

TOXIC, From F1

Robert Caron, the on-site coordinator for the EPA, described the drums already tested as "half empty, some were leaking and others were bulging open." Nelson said the state has monitored the site since 1980, but until last week was unable to begin a process of removing materials there.

During a public hearing last night at Patterson High School, next to the dump in the 100 block of Kane St., about 200 indignant residents chided Nelson, EPA officials and other health experts for not warning them about the dump site in 1980. They also asked why the state waited four years to begin the cleanup project.

Nelson said three conditions caused the delay:

□ When the state health department first began monitoring the dump in 1980, toxic waste was discovered at two other sites in Maryland and nearly all the state's resources were applied there.

□ Meanwhile, the owner of the land since 1962, Baltimore attorney Edward Azrael, refused to remove the materials and declined to cooperate with investigators, Nelson said. Azrael denounced Nelson's statement yesterday and called it "an absolute lie."

□ The state could not get the EPA involved because at that time, conditions at the dump were not considered an emergency under federal guidelines.

"These are not excuses," Nelson told the crowd.

□ District councilwoman at last night's council meeting said, "Lifey are faulty."

"But what about four years ago?" a man shouted. "We want you to know we should have known four years ago."

Darryl Braithwaite, an environmentalist with Clean Water Action, speculated that the delay oc-

curred because state officials either underestimated the potential dangers or let the whole situation "slip through the cracks."

But Nelson said circumstances at the dump had changed since 1980, causing officials to become more alarmed. A small brush fire Feb. 22 singed trees, bushes, trash and other refuse, which made the surface drums more visible.

The brush fire also created an emergency situation which alerted the EPA, Nelson said.

Since William Ruckelhaus replaced Anne M. Gorsuch as the EPA chief administrator, Superfund money allotted for cleaning up such hazardous sites is more available, Nelson said.

The cleanup, the sixth in the state with Superfund money, will cost \$710,000, said Harold Yates, an EPA spokesman. It will be conducted in several stages.

A chain fence was to be erected today to keep out children who play at a baseball field next to the dump. More soil samples will be taken and testing of the air quality will be conducted to determine whether hazardous vapors are being emitted into the air.

The wooded dump site is cluttered with trash, tree limbs, and covered in parts by weeds and wild flowers. It is directly across from the PICORP Inc. repair and storage company in the 6500 block of Lombard St., and near City Hospital. Members of the Coast Guard were guarding the area yesterday.

day and will continue to do so until the cleanup ends.

Health officials also planned to meet periodically with community groups to discuss the procedure. A hotline is being installed to give the latest information. The number to call is 396-1188.

If further construction at Patterson are dismissed for said.

Francis Z. Thomas, Pat



Now through Saturday (May 9-12) White Marsh has put together a sparkling collection of gifts for great Moms. And don't forget your grandmas, great aunts, godmothers and wives too when you celebrate Mom's special day.

With 5 of the best department stores like Bambergers, Hutzlers, J.C. Penney, Sears and Woodward and Lothrop, you've got a shopping resource that really rewards your needs. And don't forget White Marsh's 28 specialty Pic Nic stores where there's always room to relax and refresh your energies.

So come on out to White Marsh and pick out a special gift for your special Mom! From 10 am to 9:30 pm, Monday through Saturday, White Marsh is Filled With The Best of Surprises! Just take 695 to 95 North to Exit 3B (Route 43 West). And look for the cattails swaying in the breeze!

'Connected,' says counsel

Thief-police tie alleged

POLICE, From F1

Two days later, Stuart filed a complaint with county police, charging that county officers "slammed [his] head against the car and held a pistol to [his] head" during his arrest, according to court records.

Stuart also claimed that the county officers waved his identification and badge to onlookers and announced, "There's one bad one in every crowd."

After interviewing city and county officers involved in Stuart's arrest at Eastern Avenue and Conkling Street, county internal affairs investigators reported that "everything claimed by [Stuart]

was either totally false or did not involve county officers," according to court records.

On Jan. 14, Stuart was charged with giving a false statement—a misdemeanor punishable by up to six months in jail and a \$500 fine.

Woods said Stuart will file a civil suit in federal court charging the county violated his constitutional rights by pressing the charges "specifically to quell his civil action."

He said Stuart was arrested "without probable cause" and that if the prosecution is successful, "his credibility will be shot" during any civil action.

SUN CLASSIFIED

539-7700

AR400434

White Marsh

Bambergers, Hutzler's, J.C. Penney

Evening Sun May 8, 1984 p. F2

Toxic-waste dump site

Sell it fast
with
Sun
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539-7700

If further construction at the site is necessary, officials probably will wait until after classes at Patterson are dismissed for the summer, Yates said.

Francis Z. Thomas, Patterson principal, said

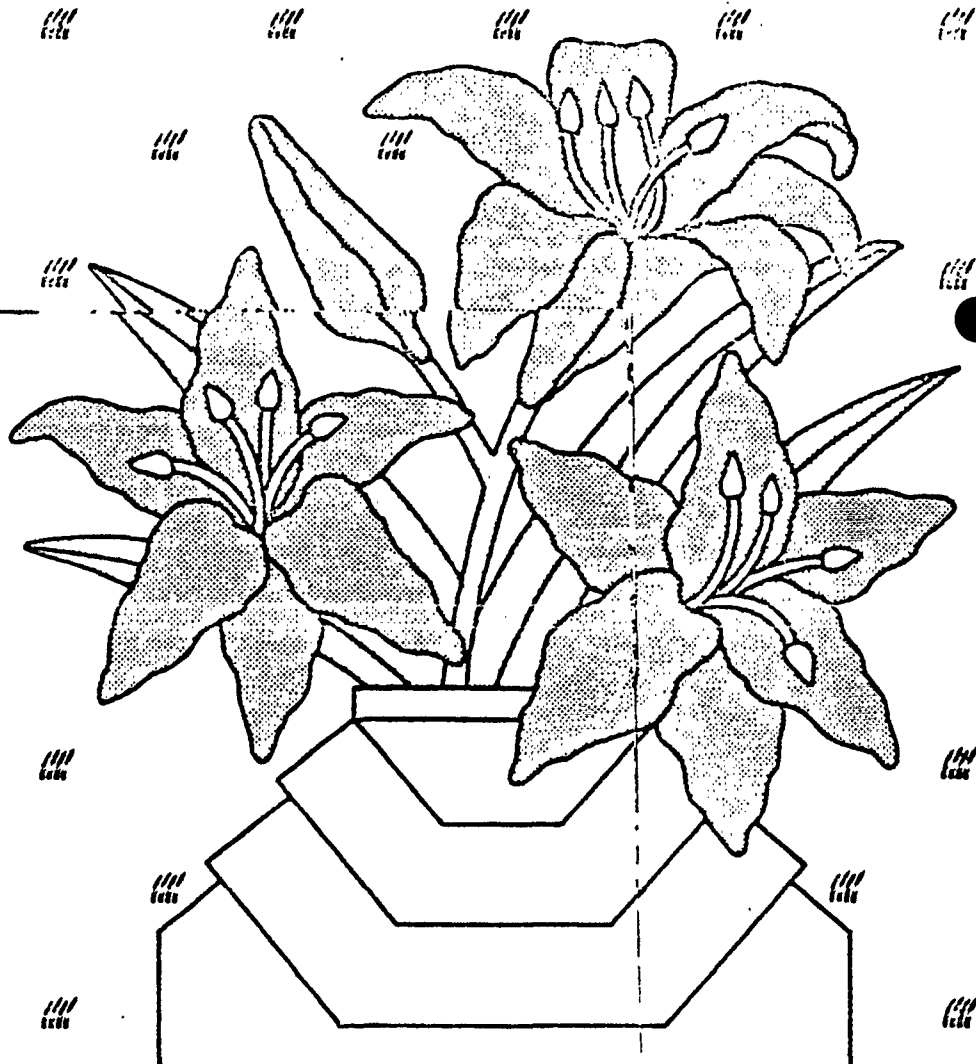
yesterday the faculty will be told the details of the situation at a regularly scheduled meeting on Monday. He said the 2,000 students enrolled at the school will be informed about the site sometime next week.

White Marsh Is Blooming With Gifts For Great Moms!

Now through Saturday (May 9-12) White Marsh has put together a sparkling collection of gifts for great Moms. And don't forget your grandmas, great aunts, godmothers and wives too when you celebrate Mom's special day.

With 5 of the best department stores like Bambergers, Hutzlers, J. C. Penney, Sears and Woodward and Lothrop, you've got a shopping resource that really rewards your needs. And don't forget White Marsh's 28 specialty Pic Nic stores where there's always room to relax and refresh your energies.

So come on out to White Marsh and pick out a special gift for your special Mom! From 10 am to 9:30 pm, Monday through Saturday, White Marsh is Filled With The Best of Surprises! Just take 695 to 95 North to Exit 3B (Route 43 West). And look for the cattails swaying in the breeze!



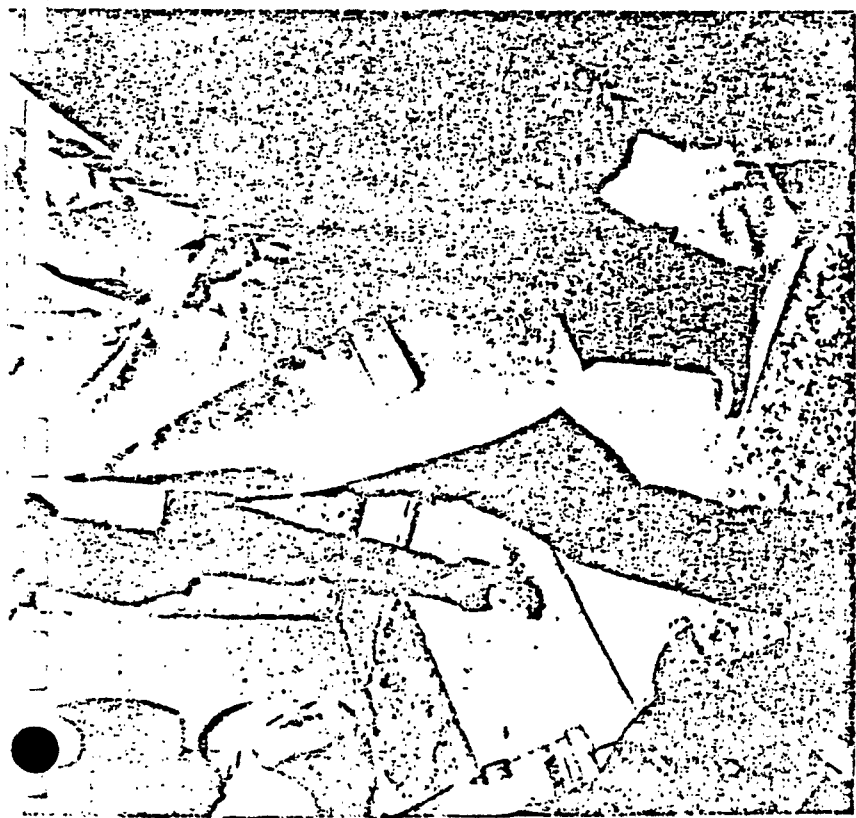
White Marsh: Filled with the best of surprises.

Bamberger's, Hutzler's, J.C. Penney, Sears, Woodward and Lothrop, and 190 shops, stores, and restaurants. Open Monday through Saturday 10 am to 9:30 pm.

ART 00435

1930

WEDNESDAY 99
 74 D1



THE SUSPECT IN THE WOUNDING OF A STATE trooper, is hustled into a police car leaving Towson District Court, where he was ordered held on \$250,000 bond.

By Roger Twigg

A 24-year-old Catholic University track star, who has been charged with gunning down a state trooper last Friday, was arrested by the officer in January on a drunk driving charge, court records show.

The defendant, Brian Joseph Flynn, appeared yesterday in Towson District Court before Judge Gerard Wittstadt, who ordered him held on \$250,000 bond. His bond had been set at \$100,000 after his arrest Monday.

Judge Wittstadt said he increased the bail after reviewing the evidence submitted by the State Police and considering the public's welfare.

The judge said that Mr. Flynn had "motive" as well as "opportunity" and "can be placed at the scene of the crime."

Mr. Flynn, a junior at Catholic University in Washington, where he is enrolled in the engineering and architecture school, is charged with assault with intent to murder Trooper Gary R. Lowman, 22, outside the trooper's home in Catonsville last Friday. He is also charged with the use of a handgun in the

commission of a crime

A spokeswoman at Catholic University said Mr. Flynn was a track star who just a week ago won a major meet. But she could provide no details of his athletic activities.

According to State Police records submitted to the court, Mr. Flynn had been arrested by Trooper Lowman January 3 for driving while intoxicated. He had been stopped by the trooper while traveling westbound on the Baltimore Beltway near Wilkens avenue about 2 o'clock in the morning.

Police said he was driving a 1976 Ford at the time. Police said the arrest was made out of the trooper's patrol area, but they were uncertain if he might have been going to or from work at the Glen Burnie Barracks at the time.

Mr. Flynn was scheduled to appear for trial on the drunk driving charge Monday before Judge Wittstadt in an Owings Mills courtroom, police said.

Gordon M. Levenson, a lawyer representing Mr. Flynn, requested yesterday that bail remain at \$100,000, arguing that the family was stable and that Mr. Flynn's

See BAIL, D2, Col. 1

Canton toxic cleanup could spread to other sites

By Michael K. Burns

The emergency cleanup of an illegal hazardous-waste dump in East Baltimore could spread to other nearby sites, health officials said yesterday.

Investigators are taking soil samples from land around the 8-acre cleanup site in Canton to see if there are other contaminated locations.

"It could be this is part of all one big location, with all of the dumping and all of the open burning that went on in open areas

there" over the years, said Linda Smevne, a state health department representative.

Hazardous-waste specialists were preparing the Canton site yesterday for what they expect will be a two-month job of removing polluted water and soil and many of the estimated 1,000 chemical barrels — most of them badly deteriorated and opened — found on the wooded, overgrown lot on Lombard street.

O. H. Materials Company, contractor for the \$710,000 job financed by the federal "Superfund,"

was grading the muddy perimeter yesterday to permit trailers and earth-moving equipment to move onto the site. Investigators took soil samples from the site, marking suspect points with orange and blue plastic flags, while a state health department air monitoring van tested air quality around the perimeter.

Longtime area residents claim that the private Seijack trash dump operated for many years on part of the 8-acre site. That landfill, which charged dumpers a tipping fee, included land that eventually was

severed by the extension of North Point boulevard, residents said.

Robert Caron, clean-up coordinator for the U.S. Environmental Protection Agency, said an immediate task would be to determine the soil condition of the adjacent city softball field and to decide whether further games should be played there.

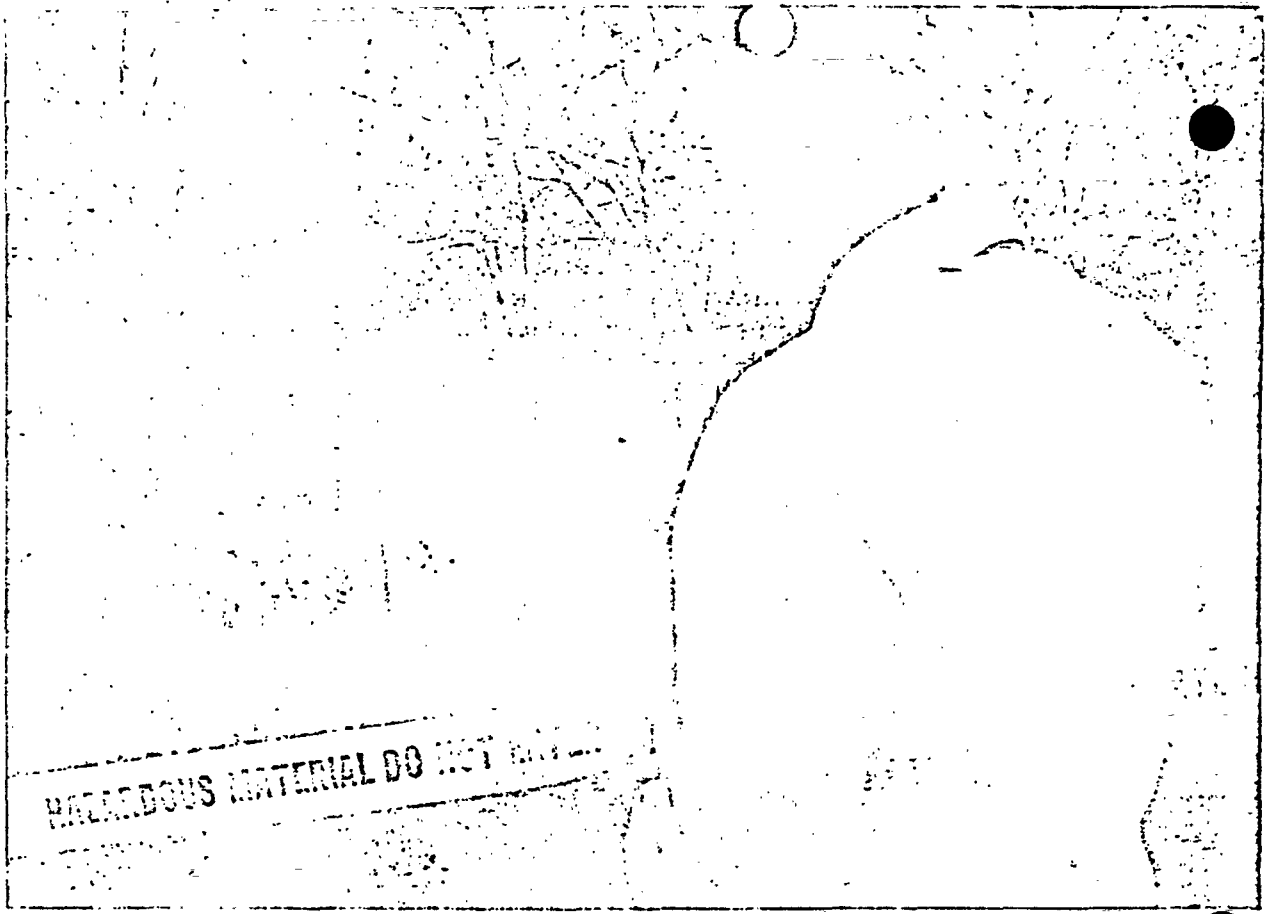
Ronald Nelson, the health department's waste management chief, told a hostile crowd of community residents Monday night

See DUMP, D2, Col. 2

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WEDNESDAY MAY 9, 1984

Pa. DZ



THE SUN/GEORGE H. ...

Warning banners temporarily mark off Canton site containing 1,000 barrels of toxic wastes.

Canton toxic cleanup could spread

DUMP, from D1

that his men are investigating other potential hazardous-waste spill sites in the East Baltimore area. A disposal site on the Eastern Stainless Steel Company property is one under investigation, he said.

More than 150 sites are on a federal-state list of potential hazardous-waste spills in Maryland, officials said. Last year, the state gave preliminary investigation to 29 of them and 32 are planned for this year, Ms. Smeyne said.

Fred Demski, president of the Eastwood Community Civic Association, said that earth from the cleanup site had been moved to build a noise-barrier berm along the Interstate 95 overpass that parallels Kane street. That structure should be carefully tested for chemicals, he told health officials.

Mr. Demski said other open fields in the industrial areas could contain caches of leaking, dumped toxic wastes.

The woods where the cleanup is

taking place, surrounded by a dozen ballfields and the high school, is said to be a frequent tramping ground for youngsters and for students sneaking off for a smoke.

During the Monday night meeting, Mr. Nelson sought to defend the department's three-year delay in informing community residents of the potential danger at the Canton site, where state investigators first found suspect barrels in late 1980.

He said that test wells and EPA air sampling confirmed in 1982 that the toxic chemicals were in groundwater (which was not used for drinking water) and in the air. But the state was concerned with more serious sites elsewhere, he explained, and the EPA did not consider it serious enough at that time.

The audience frequently referred to state and city efforts to deny knowledge of illegal dumping of hazardous materials at the Monument street landfill, which is also in the area. Hundreds of bar-

rels of toxic wastes were found to have been buried illegally on the now-closed site that is being monitored for pollution migration.

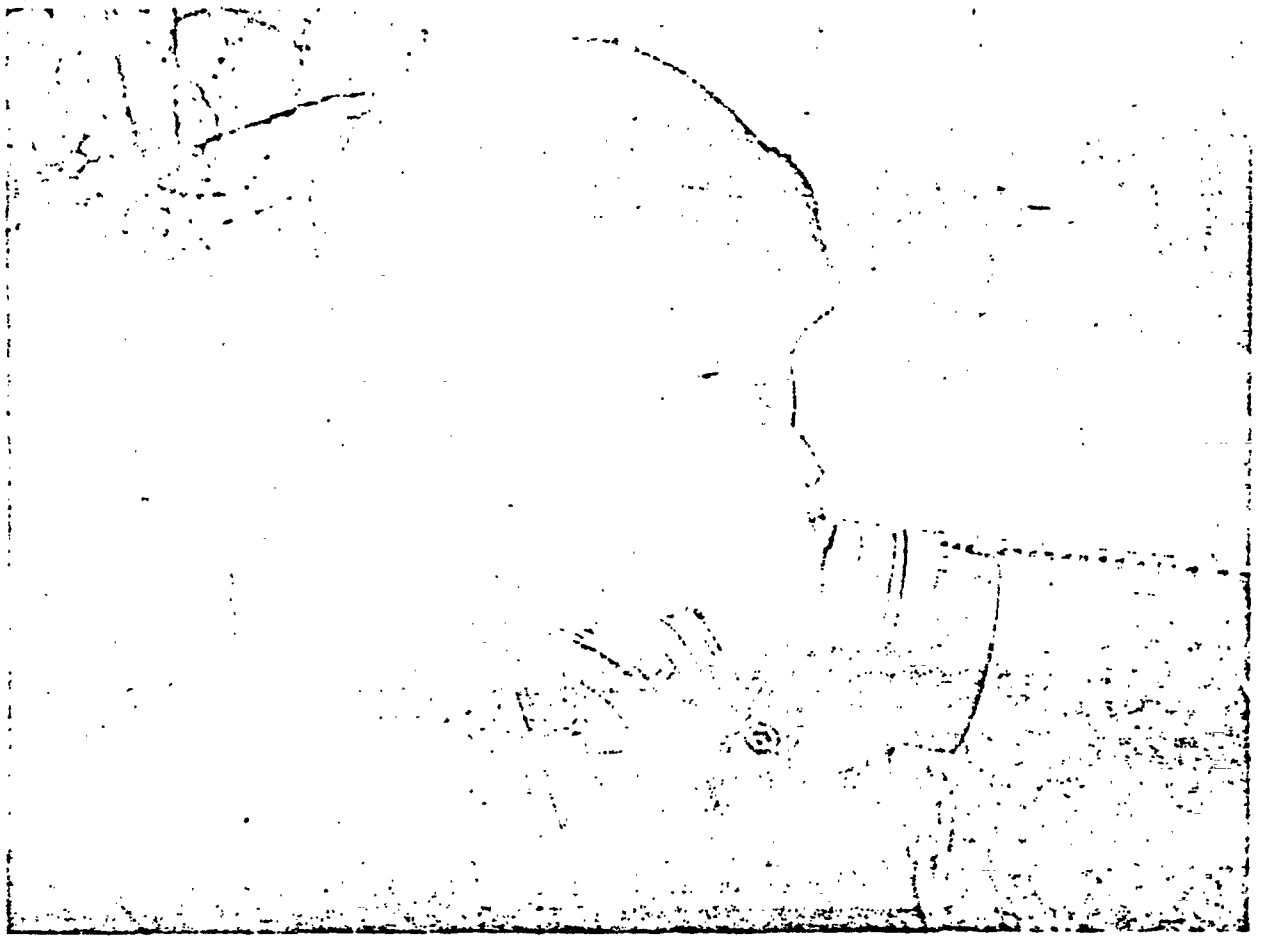
The state attempted to get the owner of the Lombard-Kane street property, Edward Azrael, to clean up the waste. He disclaimed responsibility and the state took him to a hearing. In February, after a brush fire set by vandals exposed many more barrels on the site and caused some chemical barrels to explode, the state sought EPA intervention for an emergency Superfund cleanup.

The EPA took chemical samples from exposed barrels May 1 and approved the emergency cleanup Friday. The area was cordoned off with warning signs Monday and a chain-link fence is being erected.

Mr. Caron, who has handled 24 other hazardous-waste removals, said there was no danger to residents of exposure to chemicals. He said the potential explosive nature of the chemicals made it necessary to act promptly.

THE SUN

AR400437



THE SUN/ED KRSCIBALM

Playing it safe

Guido Guarnaccia, of the Wells McComas Improvement Association in Northpoint, protected himself yesterday while he inspected the illegal hazardous waste dump in Eastwood.

THE SUN

THURSDAY
MAY 10, 1984

Pg. D1

AR400438

ARE YOUR KIDS SAFE FROM TOXIC WASTES? FIND OUT!

DO YOU KNOW THAT:

- THERE IS AN ILLEGAL 7 ACRE HAZEROUS LANDFILL ON EASTERN SEAMLESS STEEL'S PROPERTY!
- THE HEALTH DEP'T. FOUND 300 BARRELS OF TOXIC WASTE LEAKED INTO THE GROUND AND WATER ON EASTERN SEAMLESS PROPERTY IN 1992
- THE PROBLEM DOESN'T END ON HANE STREET. IT'S ALONG FALLEN LEAF TOO!

MON. MAY 14TH - 7 PM

COLGATE ELEM. SCHOOL ^{5143 BROUGH}
^{ST.}

EASTWOOD, WELLS-MCCOMAS
AND OTHER AREA
IMPROVEMENT ASSOCIATIONS
WILL BE THERE!

OUR ELECTED REPRESENTATIVES
AND HEALTH DEP'T OFFICIALS
WILL BE THERE!

IMPORTANT MEETING

YOU OWE IT TO YOURSELF,
YOUR FAMILY AND
YOUR COMMUNITY TO
BE THERE

COLGATE IMPROVEMENT ASSOCIATION

ARR 00639

Handout at Meeting (Notes) 31 May 1984
Patterson Park High School

Even after thousands of drums of hazardous waste are removed from the Patterson High School area, the most important question of all (still) goes unanswered.

Has the health of Southeast Baltimore children been damaged because State and City officials took four years to warn parents about cancer-causing materials in their back yard?

We can only be skeptical when these same officials now say that all is well.

An immediate health screening of area residents - especially the children - must take place at the expense of all responsible agencies. A study of university records is also essential to find out whether the hazardous wastes have caused birth defects and stillbirths.

While the situation demands these steps first of all, there is another matter which must not be swept aside. A full investigation must be made into the apparent neglect by health authorities of their duty to safeguard public health. Exposing the cover-up is as vital as finishing the cleanup. Otherwise, these scandals will happen again and again.

OUR CONCERNS

1. No more 5 o'clock meetings. (Working people cannot attend.)
2. We want an independent agency to perform quality assurance testing indicating the specific amounts of chemicals found.
3. We want a complete list of compounds found, when and how they were tested, where they were found and at what levels, including those found in the ground.
4. Why did the City and State sit on this information for four (4) years?
5. We want to know who's responsible for making the decision not to release information regarding the landfill to the community.
6. We want to know who did the dumping.
7. We want a medical screening of the community.

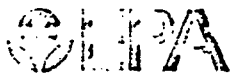
Anne Fries, Bayview Civic Association
Bob Stansbury, Festwood Youth Association
Gleann Beckman, Vice-President, Hancock Improvement Assn.
Margaret Holloway, President, Hancock Improvement Assn.
Ben Neil, President, Our Lady of Fatima Church Council
Howard Silverberg, Acting President, S.E.C.O.
Colgate Improvement Association
Wells McGomas Improvement Association

United States
Environmental Protection
Agency

Region 3
6th & Walnut Streets
Philadelphia, PA 19106
(215) 597-9525

Office Business
Priority for Private Use
5:00

Postage and
Fees Paid
Environmental
Protection
Agency EPA 335



Environmental Advisory

Contact: Janet Luffy
(215) 597-9825
Harold Yates
(215) 597-0798
June 26, 1984

EPA CLEANUP COMPLETED AT KANE AND LOMBARD SITE IN BALTIMORE

PHILADELPHIA, PA -- U.S. Environmental Protection Agency analysis of the 1,164 surface drums removed from the Kane and Lombard site revealed toxic levels of naphthalene, polynuclear aromatics, phthalates, toluene, ethylbenzene, benzene, acrolein, chromium, lead, and zinc. One drum contained low levels of polychlorinated biphenyls (PCBs).

Although soil testing near the drums revealed the presence of PCBs, phthalate, toluene, lead, and zinc, none of these toxic substances was found to be present in levels considered to be toxic by the Centers for Disease Control in Atlanta, Georgia.

The conclusion drawn from the site investigation is that the hazardous materials that presented an imminent threat to public health and the environment were eliminated by the removal of the surface drums.

The site is now stabilized and there is no danger of migration of hazardous substances from the site. The soil disturbed by the removal of the surface drums has been completely covered by at least six inches of clean topsoil, with a total of 10,000 cubic yards of clean topsoil used on the site. The security fence and posted warnings should minimize the possibility of direct human contact.

The site is presently undergoing a Quality Assurance Review to check the accuracy of the data collected. A Hazard Ranking Score will be determined by groundwater, surface water and air quality data. This score will be used to compare this site with others from across the nation and to determine whether this site will be placed on the National Priorities List (NPL) for remedial action under Superfund. The new NPL will be published around the beginning of October this year.

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AR400641

Kane and Lombard Hazardous Waste Cleanup

Fact Sheet

June 25, 1984

Location and Description

The Kane and Lombard Site is located near the intersection of Kane and Lombard Streets in East Baltimore adjacent to Patterson Park High School. The 8.3 acre site is located in an area that has historically been used as a fill for demolition debris, household trash and as an open burning dump.

Actions Taken

This Superfund project called for a four phase program to be carried out. The phases were as follows:

Phase I - Security - The site was secured by erecting an eight foot chain link fence. A 24-hour guard was supplied throughout the project duration.

Phase II - Assessment - Total assessment for potentially hazardous materials on the site was carried out. This included intensive sampling of soils, water, spilled and drummed material and analysis of ambient air quality throughout the project.

Phase III - Removal and Disposal - This phase called for staging drums of potentially hazardous material on site and the removal of same from site for ultimate disposal.

Phase IV - Restoration - This phase called for backfilling and regrading the site, covering with topsoil and hydroseeding to assure site stability and to prevent the development of future environmental problems.

Time Frame

April 15, 1984 - Maryland Office of Environmental Programs requests Environmental Protection Agency to activate "Superfund" for site cleanup.

May 1, 1984 - State and Federal personnel perform on site assessment of property with representative of owner.

AR400442

Kane and Lombard Hazardous Waste Cleanup

- May 3, 1984 - EPA authorized Immediate Removal Action. Congresswoman Mikulski gives personal backing to action.
- May 7, 1984 - Public meeting #1 held at Patterson High School.
- May 8, 1984 - Site mobilization begins, Phase II Assessment Program begun.
- May 9, 1984 - Phase I Site Security begun. On site meeting with community leaders.
- May 11, 1984 - Phase III Removal and Disposal of surface drums begun.
- May 15, 1984 - Phase I completed.
- May 23, 1984 - Second meeting with community leaders to give update on site progress.
- May 31, 1984 - Third meeting with community leaders to give update on site progress and address citizen concerns.
- June 4, 1984 - Phase IV Site Restoration begun.
- June 6, 1984 - Phase II and III completed, site demobilization completed.
- June 8, 1984 - Phase IV completed.

Summary

As a result of the site activity, a total of 1164 drums were removed from the site, of that number, 1115 were shredded and shipped out in bulk form, thus minimizing disposal costs. The material in the remaining 49 drums was solidified and shipped out in 85-gallon recovery drums. All materials were shipped to sites out of state. All material except one drum, which was contaminated with PCB, was shipped to a site operated by Fondessey, Inc. in Orogen, Ohio. The PCB drum was shipped to a site by SCA in Model City, New York.

Total cost of the project was \$600,000.

Future Plans

The State will continue sampling of monitoring wells and work with EPA to evaluate the site for possible remedial action under "Superfund."

ARL00043

KANE AND LOMBARD STREET
SUPERFUND CLEANUP

Public Meeting
June 26, 1984
7:30 p.m.
Patterson Sr. High

AGENDA

7:30 p.m.	Ronald Nelson, Director Waste Management Administration	Welcome and Introductions
7:40 p.m.	Bob Caron, On-scene Coordinator U.S. EPA Region III	Cleanup activities including summary of chemicals found and costs.
8:00 p.m.	Harold Yates, Press Officer U.S. EPA Region III	Superfund Remedial Program, future EPA actions.
8:10 p.m.	Ronald Nelson	Future State actions.
8:20 p.m.	Dr. Susan Guarnieri Baltimore City Health Commissioner	Summary of health effects review by the Centers for Disease Control, Baltimore City Health Department, and State Department of Health and Mental Hygiene.
8:40 p.m.	Ronald Nelson	Questions & Answers.

AR:00444

HEALTH AND ENVIRONMENTAL INFORMATION
KANE and LOMBARD STREET SUPERFUND SITE
June 26, 1984

Summary of Conclusions:

1. Playgrounds around the site are safe for play.
2. There is no indication that chemicals have migrated from the site to surrounding areas. Toluene was detected at the perimeter of the site in a drainage basin at very low levels. This contamination cannot be directly attributed to the site as toluene is often found at these background levels in soil.
3. Human exposure to the contaminants would occur from direct contact with the contents of the drums or the soil around and under the drums. The identified organic chemicals are usually associated with immediate and temporary effects like headache, burning eyes, dermatitis, etc. Delayed or chronic health effects from short term exposure would not be expected. People who walked through the area may have had minimal exposure which would not be different from exposure to low levels of chemicals at gas stations and dry cleaning establishments.

Chemicals Found in the Groundwater

Vinyl Chloride	Dichloroethane
Chlorobenzene	Trichloroethene
Dichloroethene	Benzene

During the clean-up, two groundwater monitoring wells were sampled. Results were generally consistent with levels of contamination detected in tests taken two years ago, showing little change in the groundwater.

Although this contamination may be of concern from an environmental perspective, there is no health threat to the community since all residents are on city water and the water is not used for drinking.

Chemicals Found in the Drums

(Coal Tar Derivatives)	(Solvents and Other Chemicals)	(Heavy Metals)
Naphthalene	Phthalates	Cadmium
*Fluorene	Ethylbenzene	Copper
*Phenanthrene	Benzene	Nickel
*Acenaphthalene	Acrolein	Lead
*Fluoranthene	Toluene	Chromium
*Pyrene	*Methylene Chloride	Zinc
*Benzo(a)anthracene	PCB's	*Mercury
*Chrysene	Cyanide	*Antimony
*Anthracene		*Arsenic
*Benzo(a)pyrene		

(*Trace Amounts)

Approximately 90% of the material contained within the drums was in a solid state and therefore would not present the potential for contamination of surrounding areas.

AR 00445

Chemicals Found in Soil

A. Chemicals On-Site (around and under drums)

Isophorone
Phthalates
Fluoranthene
Dichlorophenol
Toluene
Cyanide
PCB's

(Heavy Metals)

Cadmium
Lead
Nickel
Zinc
Selenium
Arsenic
Beryllium
Mercury
Chromium
Copper

The major route of exposure to heavy metals in soil is through ingestion (swallowing). However, a large amount of contaminated soil would have to be swallowed to produce health effects.

B. Playground area next to site

No contamination detected. Playing fields adjacent to the east side of the site and the Joseph Lee Park fields have been determined safe to play, including the berm and playground at I-95.

Chemicals Found in Air

Toluene

Normal background levels for ambient air in the Baltimore area were established prior to removal of the drums. A mobile air monitoring laboratory tested air quality away from the site.

The only chemical that was found to be above normal background levels was toluene, detected at 1 ppb during removal operations.

CITY OF BALTIMORE

WILLIAM DONALD SCHAFER, Mayor



HEALTH DEPARTMENT
Susan R. Guarnieri, M.D., M.P.
111 North Calvert Street, Baltimore, Maryland 21202

26 June 1984

Dear Community Resident:

The Health Department wishes to take every practical action to alleviate your concerns about the chemicals connected with the Kane/Lombard Streets landfill.

The Centers for Disease Control has assured us that there is no cause for concern and that a formal health screening program is not necessary. However, if you feel a family member has come in direct, extensive contact with one of the drums found on the site, we will assist you in obtaining medical evaluation. The Health Department has contacted several physicians in your area and apprised them of your concerns.

The attached list contains the name, address, telephone number and specialty of these physicians. They will be supplied with the information concerning the chemicals connected with the landfill and should certainly be able to provide you appropriate medical assistance.

If you are currently utilizing a physician who is not on this list, we will gladly assist him or her. Have your physician call the Health Department. The contact person is Dr. Diane Dwyer, 396-4444.

Again, all evidence indicates that there is no health hazard to the general population surrounding the landfill.

Sincerely,

Susan R. Guarnieri, M.D., M.P.H.
Commissioner

SRG/jls

Attachment

ARL00647

<u>Name</u>	<u>Address</u>	<u>Phone</u>	<u>Specialty</u>
Chalom, Albert	6002 Eastern Avenue	633-2660	OB/GYN
Chang, Young	716 South Dean Street	675-1102	OB/GYN
Dendrinis, George J.	5113 Eastern Avenue	633-3472	IM
Facelo, Marino R.	402 South Highland Avenue	879-9306	OB/GYN
Herrera, Enrique	1001 Dundalk Avenue	633-5852	GP
Joven, Lucrecia	716 South Dean Street	675-1101	PED
MacDonald, Dennis	9 South Highland Avenue	276-1764	GP/IM
Nour, A. F.	121 South Highland Avenue	675-0050	IM
Prabhaker, Madura L.	3413 East Lombard Street	675-7100	GP
Zarbin, Gino	3503 Foster Avenue	675-8922	PED

Albert Witzke Medical Center	3411 Bank Street	396-8195
Chesapeake Health Plan Community Service Center (at City Hospital)	4940 Eastern Avenue	342-7300

OB/GYN - Obstetrician/Gynecologist
 IM - Internal Medicine
 GP - General Practitioner
 PED - Pediatrician

AR 400:48

APPENDIX F
FEASIBILITY STUDIES

AR400649

O H M

THE ENVIRONMENTAL SERVICES COMPANY

O.H. MATERIALS CO
16406 U.S. Route 224
PA, Box 551

Phone: (610) 457-0850

Phone: (610) 427-4526

800-537-9340 (24 hr)

800-537-5380 (in Ohio)

Telex: 269248 OHM US (RU)

Robert Caron
U.S.E.P.A.
6th and Walnut Streets
Curtis Building
Philadelphia, Pa 19106

Dear Sirs;

Enclosed is the cost estimate for the shredding of non-flammable hazardous material NOS full and empty drums. The advantages contained within are estimated costs, actual costs may vary depending on disposal facilities and transportation costs. This estimate is based on the information available at this time.

Received by


Robert Caron
O.S.C. U.S.E.P.A.

Response Manager


Lloyd E. Stauffer
O.H. Materials

Empty and Full Drums - Crush and Disposal

350 full drums - 7 truckloads = 140 yd @ 110/yd.	=	\$ 15,400.00
750 empty drums - 10 truckloads = 200 yd @ 40/yd	=	8,000.00
Trucking - 7 loads - 580 miles @ 3.15/mile	=	12,789.00
Trucking - 10 loads - 580 miles @ 3.15/mile	=	<u>18,270.00</u>
Subtotal		54,459.00
8% Handling		<u>4,356.72</u>
		\$ 58,815.73

Empty and Full Drums - Shredded and Disposal

350 full drums - 3 truckloads = 60 tons @ 110/ton	=	6,600.00
750 empty drums - 3 truckloads = 60 tons @ 40/ton	=	2,400.00
Trucking - 3 loads - 580 miles @ 3.15/mile	=	5,481.00
Trucking - 3 loads - 580 miles @ 3.15/mile	=	<u>5,481.00</u>
Subtotal		19,962.00
8% Handling		<u>1,596.96</u>
		\$ 21,558.96

The above prices do not include:

Federal tax	=	2.13/ton
Ohio Tax	=	9% disposal cost
Oregon City Tax	=	1.00/ton

AR400451

OHM

Empty and Full Drums - Crush and Disposal

350 drums full - 7 truckloads = 20 yards/load = 140 yards
Approximately 50 drums/load = 50 x 600 lbs./drum = 32,500 lbs.
750 empty drums - 10 truckloads @ 20 yards each = 200 yards
Approximately 75 drums/load = 75 x 20 yards each (disposal by yard)

Empty and full Drums - Shredded and Disposal

350 full drums - 3 loads @ 20 tons per load = 60 tons
117 drums per load
750 empty drums - 3 truckloads - 72 lbs./drum = 54,000 lbs.
250 drums per truckload

Advantages to the shredding method are consistency in weight and space utilized. These estimates may vary depending on the amount of material contained in the drums, guage of drum, and if any solidification material will be required to absorb any free liquid which may have accumulated (rain water).

Cost Breakdown for Non Flammable Hazardous Material N.O.S.

Crush/disposal vs. Shredding/disposal

Empty and Full Drums- Crush	Disposal
350 Full Solid	\$ 15,400.00
750 Empty	\$ 8,000.00

S./T.	\$ 23,400.00

Empty and Full Drums - Crush	Transportation
350 Full Solid	\$ 12,789.00
750 Empty	\$ 18,270.00

S./T.	\$ 31,059.00
S./T.	\$ 54,459.00
+ 8%	\$ 4,356.00

T.	\$ 58,815.00

Empty and Full Drums - Shredded	Disposal
350 Full Solid	\$ 6,600.00
750 Empty	\$ 2,400.00

S./T.	\$ 9,000.00

Empty and Full Drums - Shredded	Transportation
350 Full Solid	\$ 5,481.00
750 Empty	\$ 5,481.00

S./T.	\$ 10,962.00
S./T.	\$ 19,962.00
+ 8%	\$ 1,596.00

T.	\$ 21,558.00

Empty and Full Drums - Crushed

Disposal	\$ 23,400.00
Transportation	\$ 31,059.00
+ 8%	\$ 4,356.72

T. \$ 58,815.72

Empty and Full Drums - Shredded

Disposal	\$ 9,000.00
Transportation	\$ 10,962.00
+ 8%	\$ 1,596.96

T. \$ 21,558.96

Mobilization of shredder	\$ 2,361.00
Shredder cost \$/day 5x\$3000	\$ 15,000.00
Demobilization of shredder	\$ 2,361.00

\$ 19,722.00

Total cost for shredding	\$ 21,558.96
	\$ 19,722.00

\$ 41,280.96

Cost saving for shredding	\$ 58,815.72
	-\$ 41,280.96

\$ 17,534.76

The use of this unique method for disposal is cost effective and will result in saving up to 30% the cost of crushing materials.

AR400454

OHM

KANE & MARR
D.O. 6893-03-007
D2E090 - F2-008
1825-EIC

Robert Caron
Steve Jarvela

U.S.E.P.A.
6 th. and Walnut Streets
Curtis Building
Philadelphia, Pa. 19106

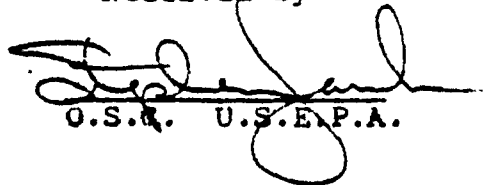
Dear Sirs,

Enclosed is the cost estimate for performing the compatibility analysis on site. The advantages provided by an on site laboratory are as follows ;

1. Rapid sample turn around time,
2. Reliable results for safe bulking operations,
3. Dedicated to a single project,
4. Immediate access to field personnel for priority analysis and references,
5. Reduced possibility of site shutdown due to the turnaround time offered by off site laboratory.

It should be noted that this is an estimated cost, actual cost may vary depending on the characteristics of the samples to be analyzed.

Received by


O.S.R. U.S.E.P.A.

Response Manager


Lloyd Stauffer OHM

AR400455

COST ESTIMATE FOR PERFORMING COMPATIBILITY ANALYSIS

OFF-SITE

Sample Analysis	37.50 / sample x 500 samples = \$ 18,750.00
Sample Shipment	7 Shipments x \$30.00 / shipment = \$ 210.00
	<u>\$18,960.00</u>

ARL00056

ESTIMATED STANDBY COST

Due to sample turnaround time from an off site lab, equipment cost on standby is as follows. Estimated turnaround time is given as 7 to 10 days. All costs listed below are based on 10 days standby.

Decontamination Trailer	\$ 900.00
Office Trailers (2)	\$ 675.00
Pickup Trucks (2)	\$ 540.00
Van	\$ 315.00
Car	\$ 247.50
225 Track Hoe	\$2,430.00
580 Backhoe	\$1,080.00
955 Loader	\$1,620.00
450 Dozer	\$1,295.00
Grappler	\$ 585.00
Air Compressor	\$ 450.00
Generator	\$1,125.00
Heavy Equipment Safety Package	\$1,536.00
Photoionization Detectors (2)	\$ 495.00
Four way booster pump	\$1,237.50
Per Diems	\$9,000.00
24 hour security	\$2,160.00

	\$ 25,690.50

Please note the above calculations do not include minor equipment required on-site - Eye wash, 2-way radios, etc. It should also be noted that this is an estimated cost, actual cost may vary depending on site requirements as directed by O.S.C.

ARL00057

ESTIMATED COST FOR PERFORMING COMPATIBILITY ANALYSIS ON SITE

Personnel

2 Lab Technicians 6 days \$3,984.00

Per Diems 6 days \$ 720 .00

Equipment

Mobile Laboratory 6 days \$1,650.00

Gas Chromatographs (2) 6 days \$2,340.00

G. C. Detectors (3) 6 days \$ 990.00

G. C. Integrators (3) 6 days \$ 990.00

Digital Pyrometer 6 days \$ 150.00

Cyanide Meter 6 days \$ 210.00

Sulfide Meter 6 days \$ 180.00

Geiger Counter 6 days \$ 480.00

Expendibles

\$1,500.00

\$13,194.00

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MOBILIZATION AND DEMOBILIZATION OF LAB TRAILER

Personnel

Driver	2 days	\$ 380.00
<u>Per Diem</u>	2 days	\$ 120.00

Equipment

Over the Road Tractor	2 days	\$ 350.00
Lab Trailer	2 days	<u>\$ 247.50</u>
		\$1,097.50

ARL00459

ESTIMATED COST FOR ELECTRICAL HOOK UP OF LAB TRAILER

<u>Materials</u>	\$ 502.74
<u>Assemble Time</u>	\$ 120.00
<u>Instalation Fee</u>	\$ 120.00 4 hours minimum
<u>Trenton Travel</u>	\$ 588.00

	\$1,330.74

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ESTIMATED TOTAL COST TO PERFORM COMPATIBILITY ANALYSIS ON SITE

Mobilization and Demobilization	\$ 1,097.50
Electrical Hook Up of Lab Trailer	\$ 1,330.74
Operational Cost	\$13,194.00

	\$15,622.24

AR400461

Cost comparison for on site and off site analytical work.

Off site analytical	\$18,960.00	-
Stand by rate on equipment	\$25,690.50	
s/B	<u>\$44,650.50</u>	

On site Lab	\$15,622.24
-------------	-------------

Off site	\$44,650.50
On site	- \$15,622.24
	<u>\$29,028.26</u>

This \$29,028.26 is a cost savings of 60% plus to the U.S.E.P.A. by utilizing the on site analytical Lab for compatibility analysis.

ARL00462

APPENDIX I

SITE STABILIZATION PLAN

AR400463

CONTENTS

INTRODUCTION (PRESENT CONDITIONS)

OFF-SITE MIGRATION

EROSION CONTROL

PROPOSAL

CALCULATIONS & RAINFALL RUNOFF

DRAWINGS

FIGURE 1. RUNOFF FLOW

FIGURE 2. PROPOSAL LAYOUT

KANE AND LOMBARD STS. DRUMSITE
SITE STABILIZATION PROGRAM

Due to the geography and characteristics of the Kane and Lombard Drumsite, there exists a potential threat of offsite migration of on-site potential contaminants. It is apparent, upon review of elevations and characteristics of site, that there may exist an erosion threat. Drainage from site will potentially enter into tributary (in two locations: 1 onsite, 1 approximately 200 feet offsite) to Herring Run. Based on preliminary survey data, and visual inspection, there appears to exist considerable slopes on/off site that would warrant a potential erosion concern. These criteria create a need for implementing an extensive site stabilization program.

Below is an outline of the proposed site stabilization program which has been developed based on available information concerning the points to be addressed. This program is not intended to address potential to any sub-surface or ground-water flow. It should be noted that many actions are based on data gathered from past records rather than from on-site studies (i.e. amount of rainfall expected; runoff to be expected, surface areas of various site physical characteristics (wooded areas, vegetated areas, etc.)). It should also be noted that the below statements/calculations are based on surveyed elevation differences and without an up-to-date topographic map; however, one is expected in the near future. Therefore, the site stabilization plan outlined below should be considered as a guide, tailored to the discussed needs as far as possible, but its implementation should be reviewed and evaluated based on the specific site conditions at the time in question.

Based on visual inspection of physical characteristics of site and surveyed elevations, ~~proposed~~ drainage directions have been proposed. (See Figure 1). Throughout project, accurate site drainage paths have not been established due to weather conditions, season, lack of significant rainfall. These parameters inhibited the likelihood on visible drainage. Based on these proposed drainage directions, the below statements were developed.

The proposed site stabilization program is divided into two major areas of concern:

- 1.) Off-SITE Migration of Potential Contaminants
- 2.) Erosion Control

1.) OFF-SITE MIGRATION OF POTENTIAL CONTAMINANTS

As per Sampling and Measuring Plan, soil and water samples were taken for analysis to aid in the determination of the extent of contamination. Preliminary results indicate no levels of significant concern, at this time. Based on visual inspection of site and preliminary surveyed elevations it appears that majority of site is sloped from W to NE (see figure 1). Potential surface drainage from main drum removal areas and staging areas is believed to flow, when and if active, to E and NE areas of site. Approximate distance to ravine on Eastside of site is in excess of 300 feet. During project there has been no visible migration of material from these areas via surface flow. It is believed that if flow would occur it would ~~apparently~~ be absorbed by vegetation along path to ravine. Drainage has been evident

AR:00465

onto site from Patterson High School Property. However, this flow travels through vegetation, (not through drum area), on SE area of site and is ~~apparently~~ absorbed before again reaching off-site.

Along the west side of site, the drainage appears to flow towards ravine and culvert approximately 200 feet from fence, (see figure 1). There exists a depression along the site access road from the decontamination area which allows drainage to flow from bottle change area and from down to the center of this depression. Flow then ~~apparently~~ migrates off-site. ^{As sampling results indicate,} there is also no need for concern regarding this area of off-site migration.

at 200 feet ditch

Note: Two off-site samples along W side of site do indicate levels of toluene; however, this data appears inconsistent with respect to each other and the other soil samples.

Based on the above study there does not appear, at this time to be a need for concern or any further measures to address off-site migration of potential on-site contaminants.

2.) EROSION CONTROL

Thru visual inspection, it is ^{observed} ~~apparent~~ that an erosion problem may exist onsite. All erosion areas appear to be located outside of "hot-zone" and many have been present previous to site activities. The areas to be addressed will be the N or W sides of site.

Along the N side of site there exists a slope of 2:1 at NW corner and a flat area at NE corner. Drainage at NW corner appears to have a tendency to flow onto Lombard Street while drainage at NE corner appears to be either non-existent or flows to E ravine. Also, due to site activities, a "gully" was excavated along "hotline" with ~~apparent~~ drainage directions toward E ravine.

Along the W side of site there ~~apparently~~ exists slopes of 1:1, 10 feet high at NW corner and 1:2, 30 feet high at SW corner. These slopes presently show evidence of erosion. Drainage from these slopes enters into W ravine and to culvert under Lombard Street. Roadway Express (adjacent property owner) has silt fences installed along bank of W ravine.

PROPOSAL

Based on visual inspection and the goals of the site stabilization program, the following proposals have been attained:

- 1.) The drum removal, drum staging and vicinity (everything east of "brei line" excluding wooded area) to be spread with minimum of 6 inches of topsoil. Then a grading of 3-5% downhill towards the NE corner of site (culvert and ravine) must be effected for the respective drainage direction.

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- 2.) West Face, NW corner and NW Face be diked/bermed so that runoff west of breakline will be towards "bowl" depression. The "bowl" drainage will be then chuted via rip-rap onto Roadway Express property which has natural sloped towards a culvert. This will stabilize the critical slopes that are presently eroded by excess runoff.
- 3.) Interceptor dikes/berms will be placed along woodline of south and southeast side of site. This is to insure that no runoff from treelines will migrate through the drum removal, drum staging and vicinity. Runoff from vegetated region however will be directed to ravine. Interceptor dike/berms will also be placed at an angle along the northern face of the site. This is so that runoff from drum removal, drum staging and vicinity will not drain onto Lombard Street, but channeled instead to the ravine.
- 4.) Sediment Control Structure will be constructed in accordance with recommendations and specifications provided by MDDNR. Forcasted material at outlet will be gravel meeting gradation of MSHA No 2 (or equivalent). Structure may run in present ravine contour (approximately for 100ft). Based upon estimated rainfall runoff, the structure must be able to contain 2,400 cubic feet of water.
- 5.) Interceptor Dikes/Berms and regular Dikes/Berms consist of clay material. Approximately 4 inches of topsoil will be laid atop and on sides. Its top width shall be 2 inches minimum; its height shall be 18 inches minimum upgraded; its slopes shall be 2:1 or flatter. It will overall be hydroseeded.

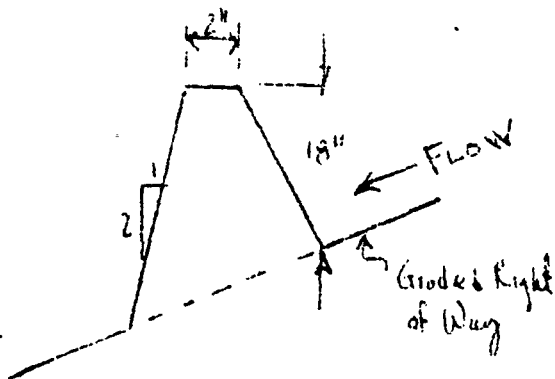


FIG. 5 INTERCEPTOR DIKES/BERMS

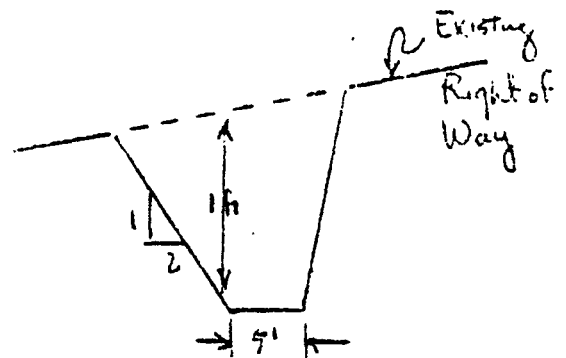


FIG. 6 DRAINAGE DITCH

- 6.) All drainage ditches shall be designed as follows. Approximately 4 inches of topsoil laid inside. Bottom shall be 5 ft. minimum wide; depth shall be 1 ft. downgradient; slope shall be 1:2 at flatter; it will overall be hydroseeded; overall ditch shall be graded so as not to exceed velocity of 3 fps
- 7.) Existing slopes and any other exposed (unvegetated) areas onsite will be hydroseeded.
- 8.) Hydroseeding shall consist of mixture of straw, latex ex-mulching and 'Kentucky 31' Tall Fescue 'Beer Lehmanns' weeping Lovegrass. For optimal seeding rate at our present season and region of the country.
- 9.) The 'gully' just outside of hotline along N side of site should be regraded and hydroseeded.

All above structures will be installed according to approximate predetermined specifications from MDDNR.

The final location and determination of control structures will be dependent on the convenience and efficiency of the installation, as per ~~ERCS~~ advancements; The above proposals (also see figure 2) are to be considered as recommendations and subject to modifications as implementation commences.

by the
contractor



BY LI DATE 5/26/81 DIV _____ SHEET 5A OF 7
 CHKD BY _____ DATE _____ DEPT _____ W.O. NO. _____
 PROJECT KANE & LOMBARD STREETS DRUM SITE / SEDIMENT CONTROL
 SUBJECT CALCULATION FOR 24 HR RAINFALL VOLUME

WEATHER BUREAU #25 pp 19 Baltimore statistic

24 hr. / 2 yr interval : 0.14 in/hr : $0.14 \times 24 \text{ hr} = 3.36 \text{ in/day}$
 " 10 yr " : 0.30 in/hr :

$0.14 \text{ in/hr} \times 24 \text{ hr} = 3.36 \text{ in} \div 12 \frac{\text{in}}{\text{ft}} = 0.28 \text{ ft}$

Site Area : 8.2 Acres $\times 43,560 = 361,600 \text{ sq ft}$

assume 20% site being wooded

$361,600 \times 0.20 = 72,320 \text{ sq ft (wooded)}$
 $" \times 0.80 = 289,300 \text{ sq ft (impervious soil)}$

Runoff Factor (from FMS-34/Engineer Field Data pg 242):

wooded/vegetated = 0.20
 impervious soil = 0.65

Wooded Area

$72,320 \times 0.20 = 14,460 \text{ sq ft (wooded)}$
 $289,300 \times 0.65 = 188,000 \text{ sq ft (impervious soil)}$

Runoff Volume

$14,460 \text{ sq ft} \times \frac{0.14 \text{ in/hr}}{12 \text{ in}} = 166.7 \text{ Ft}^3/\text{hr (wooded)}$

$188,000 \text{ sq ft} \times \frac{0.14 \text{ in/hr}}{12 \text{ in}} = 2193 \text{ Ft}^3/\text{hr (impervious soil)}$

TOTAL $2360 \text{ Ft}^3/\text{hr}$ (check must be made for runoff)
 $= 0.66 \text{ Ft}^3/\text{sec}$

X-section area of pipe for 100% of 10 ft

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$0.66 \times 1640 \text{ GZ}$

WESTON

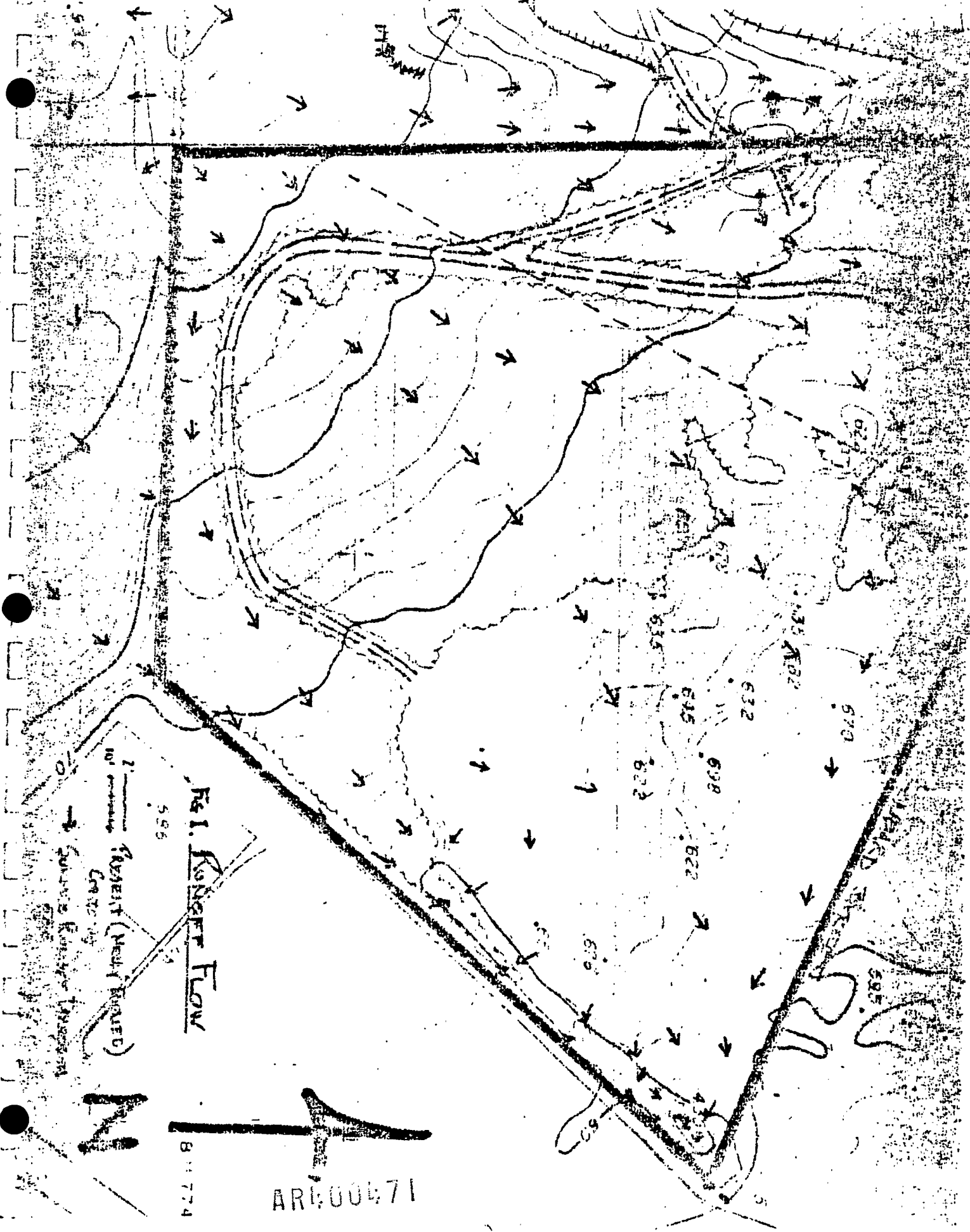
BY CL DATE 7/20/84 DIV _____ SHEET 9B OF 7
 CHKD BY _____ DATE _____ DEPT _____ W.O. NO. _____
 PROJECT W. Ave. & Lombard Streets Drain Site / Sediment Control
 SUBJECT Calc for Site Rainfall Runoff Volume -

* Conversion: (1421 ft³ = 1 gal)

0.66 Ft³/sec = 2976 ft³/hr
 54070 ft³/day

3.66 Ft³/sec = 4.937 gal/sec
 296.2 gal/min
 17440 gal/hr
 426100 gal/day

AR400470



2' contour interval
 100' contour interval
 500' contour interval
 1000' contour interval
 1500' contour interval
 2000' contour interval
 2500' contour interval
 3000' contour interval
 3500' contour interval
 4000' contour interval
 4500' contour interval
 5000' contour interval
 5500' contour interval
 6000' contour interval
 6500' contour interval
 7000' contour interval
 7500' contour interval
 8000' contour interval
 8500' contour interval
 9000' contour interval
 9500' contour interval
 10000' contour interval

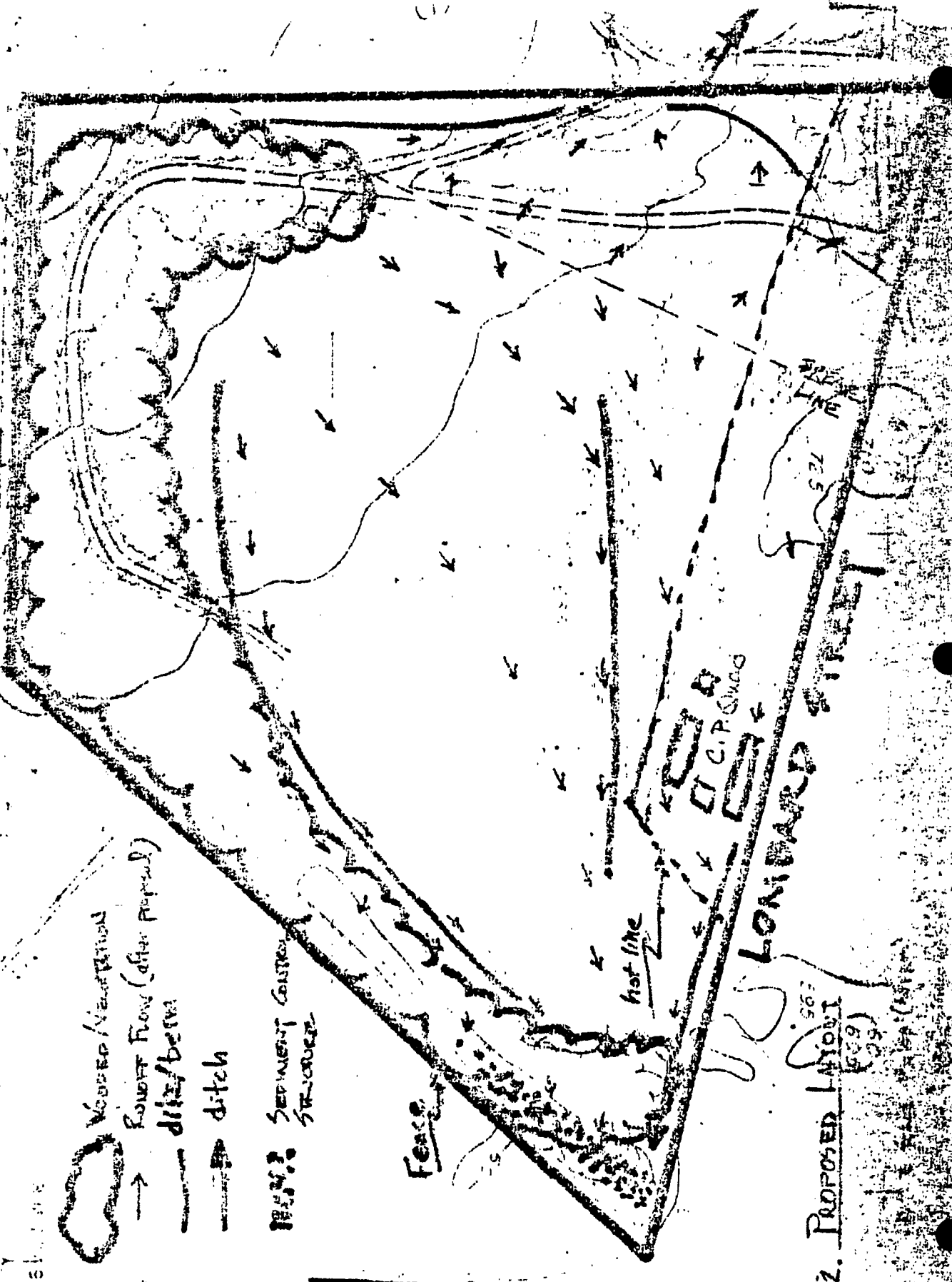
Fig. 1. Concept Flow

N

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MOUND/VENTILATION
 → FLOW FLOW (after proposal)
 --- ditch/berm
 --- ditch
 18.5.2 SEDIMENT CONTROL
 STRUCTURE



AR400472

FIG 2. PROPOSED LAYOUT
 1989
 1989

APPENDIX J
DELIVERY ORDER

ARL:004:73

DELIVERY ORDER FOR EMERGENCY RESPONSE CLEANUP SERVICES

(This delivery order is issued subject to all terms and conditions of the contract identified in Block 2.)

1 DATE OF ORDER <i>May 7, 1984</i>		2 CONTRACT NUMBER <i>68-01-6893</i>		3 ORDER NUMBER <i>6893-03-007</i>	
4 TIME OF INITIAL ORDER (If initial order was verified) (Specify Time Zone) <i>1420 hrs. 5/4/84</i>		5 DELIVERY ORDER CEILING AMOUNT (Obligated Amount) <i>\$250,000</i>			
6 ACCOUNTING AND APPROPRIATION DATA					
<input type="checkbox"/> AM <input checked="" type="checkbox"/> PM		Appropriation Number <i>68/box/8/45</i>	Document Control No. <i>D2E090</i>	Account Number <i>4TFA723 EB.2</i>	Object Class <i>25.35</i>
7a ISSUED TO CONTRACTOR (Name, Address, and ZIP Code) <i>O.H. Materials Co. P.O. Box 551 Findlay, Ohio 45830</i>			7b ISSUED BY ORDERING OFFICE (Name, Address, and ZIP Code) <i>U.S. Environmental Protection Agency 6th and Walnut Streets Curtis Building Philadelphia, PA. 19106</i>		
7d PROGRAM MANAGER (Name and Phone Number) <i>Walt Youngblade 800-338-4508</i>			8b EPA REGION/USCG DISTRICT <i>III</i>		8c ZONE <i>1</i>
7c RESPONSE MANAGER (Name and Phone Number) <i>Lloyd Stauffer 800-537-9540</i>			8d ON SCENE COORDINATOR (Name and Phone Number) <i>Robert E. Cron 215-597-2711</i>		
9 RESPONSE LOCATION (Site Name and/or Address and ZIP Code) <i>Kane and Lombard Streets Drum Site Baltimore, MD.</i>			10 CONTRACTOR REQUIRED ON SITE (Date and Time) (Specify Time Zone) <i>0800 hrs. 5/7/84</i>		<input checked="" type="checkbox"/> AM <input type="checkbox"/> PM
			11 REQUIRED WORK COMPLETION DATE <i>90 days - 9/1/84</i>		

12. STATEMENT OF WORK

The Contractor shall furnish the necessary personnel, materials, services, facilities, and otherwise do all things necessary for or incident to the performance of the work set forth below

See attached Scope of Work

13 ORDERING OFFICER		
NAME TITLE <i>Robert E. Cron</i>	SIGNATURE <i>[Signature]</i>	DATE <i>5/7/84</i>

ATTACHMENT #1

SCOPE OF WORK - LOMBARD DRUM SITE

1. THE CONTRACTOR SHALL INSTALL A PERIMETER FENCE AS PER THE INSTRUCTIONS OF THE OSC.
2. THE CONTRACTOR SHALL PROVIDE THE NECESSARY EQUIPMENT, MATERIALS, AND PERSONNEL TO PHYSICALLY PREPARE THE SITE FOR PLACEMENT AND OPERATIONS OF EQUIPMENT AND FACILITIES TO BE USED DURING THE PROJECT.
3. THE CONTRACTOR SHALL PROVIDE THE EQUIPMENT, MATERIALS, AND PERSONNEL NECESSARY TO REMOVE, HANDLE, AND DISPOSE OF DRUMS AND CONTENTS THAT MAY BE PRESENT ONSITE. THE WORK AREAS AND EXTENT OF THE REMOVAL ACTIONS WILL BE DETERMINED AND DIRECTED BY THE OSC.
4. THE CONTRACTOR SHALL PROVIDE THE NECESSARY PERSONNEL AND EQUIPMENT TO CONDUCT AIR MONITORING, SAMPLE COLLECTION, AND ANALYSES AS DIRECTED BY THE OSC.
5. THE CONTRACTOR SHALL PROVIDE EQUIPMENT AND PERSONNEL TO COLLECT AND ANALYZE VARIOUS MEDIA SAMPLES, INCLUDING LIQUIDS, SOLIDS, AND SOILS AS DIRECTED BY THE OSC.
6. THE CONTRACTOR SHALL PROVIDE THE CAPABILITY TO EXCAVATE, TRANSPORT, AND DISPOSE OF CONTAMINATED SOILS AS DETERMINED NECESSARY BY THE OSC.
7. THE CONTRACTOR SHALL PROVIDE THE NECESSARY EQUIPMENT, MATERIALS, AND PERSONNEL TO RESTORE THE SITE TO THE CONDITION REQUIRED BY THE OSC. THIS WORK MAY REQUIRED THE PLACEMENT OF A SURFACE BARRIER (NATURAL OR ARTIFICIAL MATERIALS) IF DEEMED NECESSARY BY THE OSC.
8. THE CONTRACTOR SHALL PERFORM DECONTAMINATION ON ALL EQUIPMENT USED ONSITE PRIOR TO DEMOBILIZATION OF EQUIPMENT OFFSITE.
9. THE CONTRACTOR SHALL PROVIDE ANY OTHER SERVICES, SUPPLIES, MATERIALS, EQUIPMENT, AND PERSONNEL AS DIRECTED BY THE OSC.

ROBERT CARON - OSC

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