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ADMINISTRATIVE RECORD FILE

EDWARDS AND EASTLACK
FRANKLIN TOWNSHIP
GLOUCESTER COUNTY, NEW JERSEY

Prepared for:
Donald R. Graham
U.S. EPA Region II
Removal Action Branch
Edison, New Jersey

Prepared by:
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Edison, New Jersey

April 1993

Administrative Records In Local Repositories

The "administrative record" is the collection of documents which form the basis for the selection of a response action at a Superfund site. Under Section 113 (K) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA), EPA is required to establish an administrative record for every Superfund site and to make a copy of the administrative record available at or near the site.

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The administrative record file will be maintained at the local repository until further notice. Questions regarding the maintenance of the record file should be directed to the EPA Regional Office.

The Agency welcomes comments at any time on documents contained in the administrative record file. Please send any such comments to Donald R. Graham, On-Scene Coordinator, U.S. EPA, Region II, 2890 Woodbridge Avenue, Building 209, Edison, New Jersey 08837. The Agency may hold formal public comment periods at certain stages of the response process. The public is urged to use these formal review periods to submit their comments.

For further information on the administrative record file, contact Donald R. Graham, On-Scene Coordinator, (609) 794-1202 (908) 321-4345.

EPA REGIONAL GUIDANCE DOCUMENTS

The following documents are available for public review at EPA Region II Headquarters, Raritan Depot, Woodbridge Avenue, Edison, New Jersey during regular business hours. Contact Douglas Kodama (908) 906-6905 for more information.

- * Glossary of EPA Acronyms
- * Superfund Removal Procedures--Revision #3. Office of Solid Waste and Emergency Response, (OSWER) Directive 9360.0-03B, February 1988.
- * Hazardous Waste Operations and Emergency Response. Notice of Proposed Rulemaking and Public Hearings. 29 CFR Part 1910, Monday, August 10, 1987.
- * Guidance on Implementation of Revised Statutory Limits on Removal Action. OSWER Directive 9260.0-12, May 25, 1988.
- * Redelelegation of Authority under CERCLA and SARA. OSWER Directive 9012.0-02B, April 1988.
- * Field Standard Operating Procedures (FSOP)
 - #4 Site Entry
 - #6 Work Zones
 - #8 Air Surveillance
 - #9 Site Safety Plan
- * Standard Operating Safety Guides--U.S. EPA Office of Emergency and Remedial Response, July 5, 1988.
- * Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA).
- * Superfund Amendments and Reauthorization Act of 1986 (SARA).
- * National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

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ADMINISTRATIVE RECORD FILE
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EDWARDS AND EASTLACK SITE

ADMINISTRATIVE RECORD FILE

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| Title: | Abstract of Document Contents |
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EDWARDS AND EASTLACK SITE
ADMINISTRATIVE RECORD FILE
INDEX OF DOCUMENTS

Document #: EE-1001-1007
Title: Removal Site Evaluation for the Edwards and
Eastlack Property, Franklin Township, New Jersey
Category: Site Identification
Author: Nick Magriples, On-Scene Coordinator
Technical Support Section
U.S. Environmental Protection Agency, Region II
Recipient: File
Date: September 29, 1992

Document #: EE-2001-2020
Title: Request for a Removal Action at the Edwards and
Eastlack Property Site, Franklin Township,
Gloucester County, New Jersey
Category: Removal Response
Author: Gad W. Tawadros, On-Scene Coordinator
Removal Action Section A
U.S. Environmental Protection Agency, Region II
Recipient: George Pavlou, Acting, Director
Removal and Emergency Preparedness Programs
U.S. Environmental Protection Agency, Region II
Date: February 18, 1993

Document #: EE-3001-1003
Title: Notice of Potential Liability
Category: Enforcement
Author: Richard Salkie, Associated Director
Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region II
Recipient: Ms. Jeannette Edwards
RD 2, Box 272
Sewell, New Jersey, 08080
Date: April 02, 1993

Document #: EE-3002-2003
Title: Notice of Potential Liability
Category: Enforcement
Author: Richard Salkie, Associated Director
Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region II
Recipient: Mr. William Eastlack
RD 2, Box 272
Sewell, New Jersey, 08080
Date: April 02, 1993

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE:

SEP 29 1992

SUBJECT:

Removal Site Evaluation for Edwards and Eastlack Property,
Franklin Township, New Jersey

FROM:

Nick Magriples, On-Scene Coordinator
Technical Support Section

TO:

File

Site I.D. No.: AE

Removal Assessment Ranking: 7

I. INTRODUCTION

On June 4, 1992, the United States Environmental Protection Agency (EPA), Removal Action Branch, received a request from the State of New Jersey Department of Environmental Protection and Energy (NJDEPE) to evaluate Edwards and Eastlack Property for Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Removal Action consideration.

There has been a release of CERCLA designated hazardous substances at Edwards and Eastlack Property. The threat of exposure through direct human contact with the abandoned drums containing paint sludges, resins and organic solvents is present since the site is easily accessible to on-site residents and to anyone else from Delsea Drive. The containers have been in place for many years and some of them appear to have leaked materials to the ground surface in the past. The threat of a fire, resulting from a spark or flame in the vicinity of the drums, exists due to the flammable nature of the material and the potential for further deterioration and/or disturbance of the drums. The subsequent release would affect the nearby residents and anyone using Delsea Drive. Based on the available information, Edwards and Eastlack Property is eligible for a CERCLA Removal Action.

II. SITE CONDITIONS AND BACKGROUNDA. Site Description1. Physical location

Edwards and Eastlack Property (EEP) is located at 689 North Delsea Drive (Route 47) in Franklinville, Franklin Township, Gloucester County, New Jersey (see Figure 1). Woodland Avenue is the nearest intersecting street to the site. EEP occupies approximately five acres, listed as Block 2301; Lots 12, 13 and 22, in a residential/rural section of the town. Empire Container Corporation, a drum storage facility, operates in the adjacent

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property to the west, and a small junkyard is located to the north of the site. The drum storage facility reportedly has been there since 1972. The nearest residence to the abandoned drums is approximately 500 feet away. Clayton High School is located approximately 1.5 miles northwest of the site. Still Run flows 3,500 feet east of the site.

2. Site characteristics

The property was purchased in 1986 by Ms. Jeanette Edwards of Sewell, New Jersey, who later granted William Eastlack, also of Sewell, co-ownership. Prior to this, the lot was once the site of an auto body repair shop and camper dealership (Dick's Camper Sales) owned and operated by Ruth and William Dick from the early 1970s to the mid-1980s.

While cleaning brush from a section of their property in the summer of 1991, the co-owners reportedly uncovered approximately forty (40), 55-gallon drums in various states of deterioration.

3. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

On July 14, 1992, samples collected at EEP by the Technical Support Section (TSS) revealed the presence of the following compounds and RCRA characteristics.

SLUDGE (mg/kg)

| | <u>EE001</u> | <u>EE002</u> | <u>EE006</u> | <u>EE007</u> |
|----------------|--------------|--------------|--------------|--------------|
| toluene | 810 | 450 | 1,600 | ND |
| ethyl benzene | 25,000 | 13,000 | 6,500 | ND |
| xylene (total) | 140,000J | 60,000J | 100,000 | ND |
| naphthalene | ND | 310J | 27,000 | ND |
| RCRA-Ignitable | NA | NA | > 200°F | 162°F |

SLUDGE/LIQUID (mg/l)

| | <u>EE003</u> | <u>EE004</u> | <u>EE005</u> |
|----------------|--------------|--------------|--------------|
| toluene | 6,800 | 500J | 440 |
| ethyl benzene | 220,000J | 1,300 | 660 |
| xylene (total) | 630,000J | ND | 3,200 |
| styrene | ND | 4,900 | ND |
| RCRA-Ignitable | 84°F | 125°F | 128°F |

NA - not analyzed
 ND - not detected
 J - estimated

NOTE: EE001 and EE002 are sludge duplicates
 EE004 and EE005 are liquid duplicates

According to an inventory of drums developed by the Technical Support Section, there are approximately forty (40) 55-gallon drums and sixty-three (63) 5-gallon or smaller containers present in the field. The majority of the containers appear to contain paint sludge and resins. Similar observations were made by the NJDEPE during an August 29, 1991 site visit. A number of the drums contain solidified material. Several appear to have leaked in the past.

All of the materials listed above are CERCLA designated Hazardous Substances, as listed in 40 CFR Table 302.4. A liquid is considered RCRA characteristic for ignitability at <140°F. The analytical data presented above is a summary of the most significant data available from the aforementioned reports.

The mechanism for past releases at EEP appears to have been spills, and improper storage practices. The mechanism for future releases to the air and soil include deterioration of the containers, and improper disturbance of the containers by the property owners or trespassers. A release of the organic solvents present in these drums could migrate through the soil and affect the residential potable water supplies of the nearby homes.

4. Site assessment activities/observations

The following EPA personnel were directly involved in the Removal Assessment conducted for the Edwards and Eastlack Property: Nick Magriples (908-906-6930) and Robert Montgomery (908-906-6934) of the TSS, Edison, New Jersey.

On July 9, 1992, the Technical Assistance Team (TAT), under the guidance of the TSS, conducted potable well sampling at 689 and 690 Delsea Drive (note that the drums are located at the former address). The samples were sent to a private laboratory for QA-Level 2 analysis of volatile and semi-volatile organics (TCL), pesticides, metals (TAL) and cyanide. After validation, the analytical data revealed that there was no significant concentrations of CERCLA hazardous substances present in either of the two potable wells.

On July 14, 1992, the TSS, accompanied by the TAT, conducted a site visit in order to assess the condition of the containers and their impact to the public and environment. Access was provided by the property owner. On this day, the OSCs and TAT inspected the drums, conducted air monitoring, completed an inventory of the materials, hazard categorized seven samples and subsequently collected five samples (including two duplicates) for laboratory analysis, including; volatile and semi-volatile organics (TCL), and in some cases RCRA-ignitability. The samples were analyzed at a private laboratory at QA-Level 2. Section II.A.3. summarizes the relevant, validated analytical findings.

Ambient air monitoring conducted around the drums with an Organic Vapor Analyzer (OVA) and HNU-Photoionization Detector (PID) revealed no readings above background. Several of the drums, when opened, indicated readings above background, with the highest being 80 units using the HNU.

5. NPL status

EEP is not a National Priorities List (NPL) site. The Agency of Toxic Substances and Disease Registry (ATSDR) has not been requested to conduct a health assessment for the site.

B. Other Actions to Date

1. Previous actions

There have been no other previous Federal actions taken at the site.

2. Current actions

Currently, there are no Federal actions taking place at the site.

C. State and Local Authorities' Role

1. State and local actions to date

The Removal Action Branch received a letter from the NJDEPE, Division of Responsible Party Site Remediation requesting that EPA stabilize the site by sampling, characterizing, overpacking and disposing of all of the containerized material, as well as, sampling the soil in areas observed to have been affected by spilled material.

Upon notification by the property owner's attorney, the NJDEPE, Bureau of Field Operations, Southern Field Office investigated the incident on August 29, 1991, confirming the presence of the containers. The situation was considered a non-emergency.

Ms. Edwards claimed to have no knowledge of the well-hidden drums upon purchasing the property. Efforts to contact the previous owner, Ruth Dick of Sumter, North Carolina, have been met without success. A formal letter and Notice of Violation issued to both Edwards and Eastlack on September 9, 1991 met with no response as the current property owners' claim to have insufficient funds to conduct the cleanup.

2. Potential for continued state/local response

Other than discussed above, there are no other State/local actions taking place at the site.

III. THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to the Public Health or Welfare

The threat of exposure through direct human contact with the abandoned containers of paint sludges, resins and organic solvents is present at EEP. The property is not fenced and is accessible from the main road (Delsea Drive) through the town. The drums, less than 1,000 feet from the main road, are visible from certain points when the heavy vegetation around the drums is cut and also probably during the winter months.

Some material appears to have been released from the containers in the past, and is currently either partially or totally solidified. If disturbed, the drums could further release their contents to the ground. A spark or flame in the vicinity of the drums could result in a fire due to the flammable nature of the materials present. The subsequent release would affect the nearby residents and anyone using Delsea Drive.

The potential health effects of a release of the materials present at EEP are discussed below.

Toluene and xylene can both cause irritation of the eyes, respiratory tract and skin. In more acute cases, the central nervous system can be affected. High concentrations of xylene vapors can result in pulmonary edema and abdominal pain.

Exposure to ethyl benzene can result in kidney, liver, chronic respiratory or skin diseases. The concern is that the kidney is the primary route of excretion of ethyl benzene and its metabolites. Individuals with impaired pulmonary function may be at a higher risk.

Acute exposure to high concentrations of styrene may produce irritation of the mucous membranes of the upper respiratory tract, nose and mouth, followed by symptoms of narcosis, cramps, and death due to respiratory center paralysis. The effects of short-term exposure to styrene under laboratory conditions include prolonged reaction time and decreased manual dexterity.

B. Threats to the Environment

Hazardous substances, particularly volatile organic compounds, are present in a number of the containers at the site. Some leakage from the drums appears to have taken place in the past. The soil in this area is sandy, increasing the potential for migration of contamination into the subsurface and the ground water. Homes in the area use potable wells for their water supply.

IV. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action to remove the hazardous substances present in the drums and on the surface soils will increase the potential for a release to occur. This, in turn, could impact the ground water and increase the potential for a fire due to arson, vandalism or incidental trespassing.

V. ENFORCEMENT

EPA has not taken any enforcement actions to date. The Office of Regional Council has been notified of the site. Section II.C.1 discusses the enforcement activities undertaken by the NJDEPE to date.

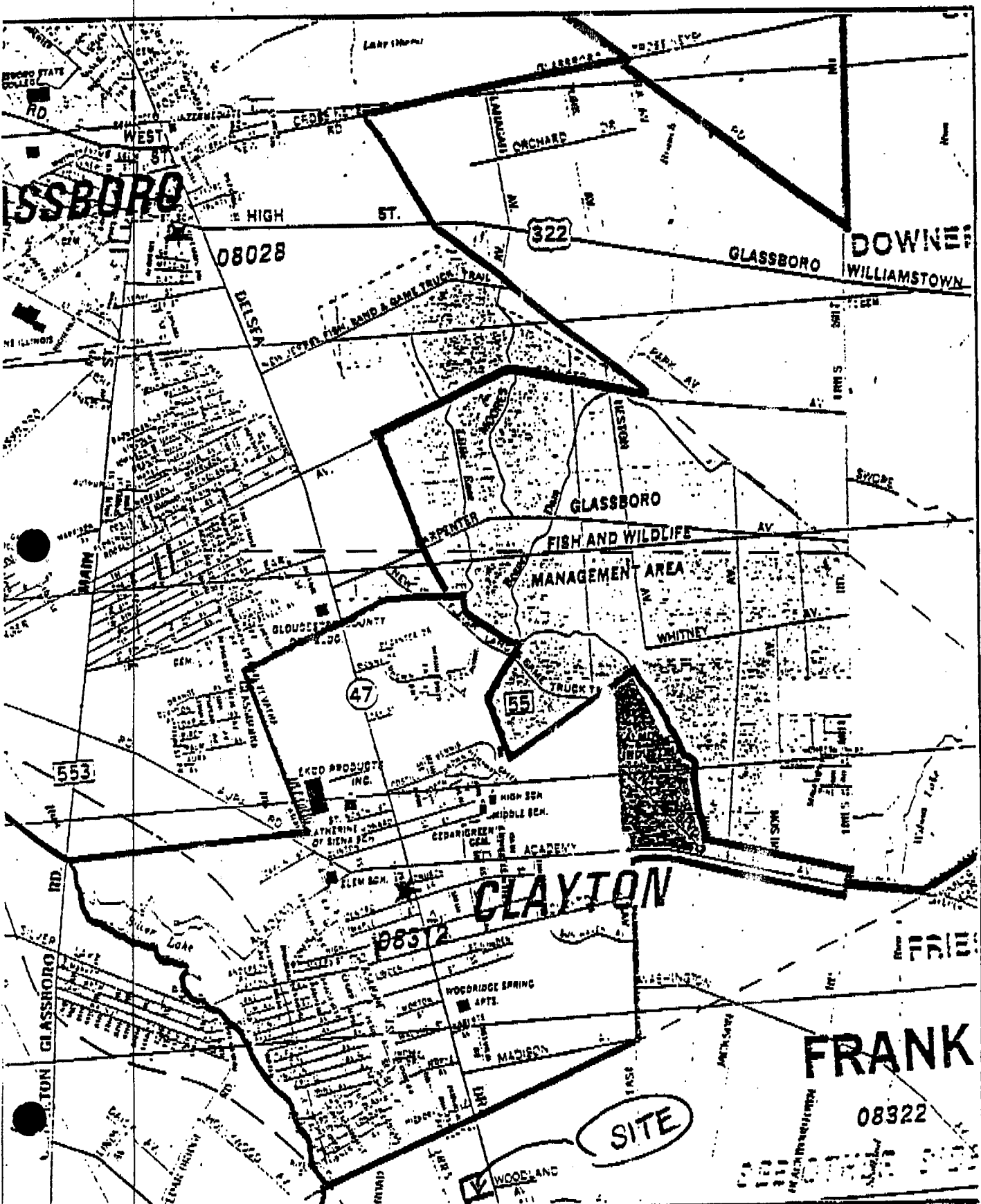
VI. CONCLUSIONS

There has been a release of CERCLA designated hazardous substances at Edwards and Eastlack Property. The threat of exposure through direct human contact with the abandoned containers is present since the site is easily accessible to the residents and to anyone else on Delsea Drive. The threat of a fire, resulting from a spark or flame in the vicinity of the drums, exists due to the flammable nature of the material and the potential for further deterioration and/or disturbance of the drums. The subsequent release would affect the nearby residents and anyone using Delsea Drive.

VII. RECOMMENDATIONS

A CERCLA Removal Action is recommended for Edwards and Eastlack Property. The action should address the containerized waste and any spilled material around the drums.

Based on information received from the residents in the area, a preliminary assessment/site inspection of the Empire Container Corporation may be warranted in order to determine whether that company's operations have impacted public health or the environment.



WESTON

Roy F. Weston, Inc.
MAJOR PROGRAMS DIVISION

EPA PM
N. Magriples

Site Location
Map



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, NEW YORK 10278

ACTION MEMORANDUM

DATE:

FEB 18

SUBJECT: Request for a Removal Action at the Edwards and Eastlack Property Site, Franklin Township, Gloucester County, New Jersey

FROM: Gad W. Tawadros, On-Scene Coordinator *D.H. Zaehner, for*
Removal Action Section A

TO: George Pavlou, Acting Director
Emergency and Remedial Response Division

THRU: Richard C. Salkie, Associate Director for *D.H. Zaehner, for*
Removal and Emergency Preparedness Programs

Site ID #: AE

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval for the proposed removal action described herein for the Edwards and Eastlack Property (EEP) site, located at 689 North Delsea Drive (Route 47) in Franklinville, Franklin Township, Gloucester County, New Jersey, 08322. The memorandum requests a total site ceiling of \$241,000, of which \$162,000 is for mitigation contracting.

At the present time, potential responsible parties that could perform the necessary removal action promptly and properly have not been identified. Administrative orders have not been issued. There are no nationally significant or precedent setting issues associated with the proposed action.

II. SITE CONDITIONS AND BACKGROUND

This Action Memorandum documents the time-critical removal action for this site with the Comprehensive Environmental Response, Compensation and Liability Information System ID number of NJD986639557.

The site consists of approximately forty 55-gallon drums in various states of deterioration and about sixty five 5-gallon or smaller containers present in a vacant residential lot. From the 1970's to

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the mid-1980's an auto repair shop and camper dealership occupied the site.

A. Site Description

1. Removal site evaluation (RSE)

The EEP site is a 5 acre residential piece of property. Prior to the property being made into a residence, an auto and camper business that sold recreational vehicles existed there.

The presence of the drums was reported to the New Jersey Department of Environmental Protection and Energy (NJDEPE) by the current co-owners who discovered the drums while cleaning brush in the summer of 1991. Soil stains verified that some of the deteriorated drums had leaked hazardous substances onto the ground surface.

On June 4, 1992, the Director of the Emergency and Remedial Response Division (ERRD) received a request from the NJDEPE to evaluate the EEP property for Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Removal Action consideration (Appendix A).

As a result of this request, on July 9, 1992, the Environmental Protection Agency (EPA) conducted potable well sampling at 689 and 690 North Delsea Drive. The drums were located on the property at 689 North Delsea Drive. The samples were analyzed for volatile and semi-volatile organic (TCL), pesticides, metals (TAL) and cyanide. After a QA Level 2 validation, the analytical data revealed that there was no significant concentrations of CERCLA hazardous substances present in either of the two potable wells.

In order to assess the condition of the containers and their impact to the public and the environment, EPA personnel, after obtaining access from the property owner, conducted a site visit on July 14, 1992. They inspected the drums, conducted air monitoring, completed an inventory of the materials, hazard categorized seven samples and subsequently collected five samples (including two duplicates) for laboratory analysis. The QA Level 2 laboratory analysis performed on these samples included volatile and semi-volatile organic (TCL), and in some cases RCRA-ignitability. Section III.A.1, summarizes the relevant, validated analytical findings.

Ambient air monitoring conducted around the drums with an Organic Vapor Analyzer (OVA) and HNU photo ionization detector (PID) revealed no readings above background. However, when several of the drums were opened, readings above background were observed with the highest being 80 units using the HNU.

The Remedial Program has not conducted any investigations at the EEP. An RSE was completed and distributed in 1992, describing the

findings of the investigation for the EEP site. Since the site poses a threat to public health and the environment the EEP meets the criteria established by CERCLA and the NCP for a removal action.

2. Physical location

The EEP is located at 689 North Delsea Drive (Route 47) in Franklinville, Franklin Township, Gloucester County, New Jersey (See Appendix A, Figure 3). Woodland Avenue is the nearest intersecting street to the site. EEP occupies approximately five acres, listed as Block 2301; Lots 12, 13 and 22, in a residential/rural section of the town. Empire Container Corporation, a drum storage facility, operates in the adjacent property to the west, and a small junkyard is located to the north of the site. The drum storage facility reportedly has been there since 1972. The nearest residence to the abandoned drums is approximately 500 feet away. Clayton High School is located approximately 1.5 miles northwest of the site. Still Run flows 3,500 feet east of the site, (See Appendix A, Figure 2).

3. Site characteristics

The property was purchased in 1986, by Ms. Jeannette Edwards of Sewell, New Jersey, who later granted William Eastlack, also of Sewell, co-ownership. Prior to this, the lot was once the site of an auto body repair shop and camper dealership (Dick's Camper Sales) which was owned and operated by Ruth and William Dick from the early 1970's to the mid-1980's.

At the present time, the residential lot is unoccupied, however the owner would like to build a one family house.

This is the first removal action at this site.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant.

The materials present at the EEP Site, summarized in section III, A.1, are hazardous substances as defined by section 101(14) of CERCLA.

There has been a release of CERCLA designated hazardous substances at the EEP site. The threat of exposure through direct human contact with the abandoned drums containing paint sludge, resins and organic solvents is present since the site is easily accessible to on-site residents and to anyone else living along Delsea Drive. The 40, 55 gallon drums and 65 containers have been in place for many years and some of them appear to have leaked materials to the ground surface in the past. Surface water run-off tends to migrate in the direction of the adjacent residential property. The threat of a fire, resulting from a spark or flame in the vicinity of the

drums, exists due to the flammable nature of the material and the potential for further deterioration and/or disturbance of the drums. The subsequent release and/or fire would affect the nearby residents and anyone travelling along Delsea Drive.

5. National Priority List (NPL) status

The EEP site is not a NPL site and will not be proposed for listing. The Agency of Toxic Substances and Disease Registry has not been requested to conduct a health assessment for the site.

6. Maps, pictures, and other graphic representations

See Appendix A, Figures 1, 2 and 3.

B. Other Actions to Date

1. Previous actions

There have been no other federal or private actions taken at the site.

2. Current actions

Currently, there are no federal actions taking place at the site. Removal activities will be started after the Action Memorandum is approved.

C. State and Local Authorities' Role

1. State and local actions to date

Upon notification by the property owner's attorney that they had discovered drums at the site, on August 29, 1991, the NJDEPE, Bureau of Field Operations, Southern Field Office investigated the incident and confirmed the presence of the containers.

Ms. Edwards, claimed to have no knowledge of the well-hidden drums upon purchasing the property. Efforts to contact the previous owner, Ruth Dick of Sumter, North Carolina, have not been successful. A Notice of Violation was issued to both Edwards and Eastlack, on September 9, 1991. Both parties failed to take any action due to insufficient funds to conduct the cleanup.

On June 4, 1992, the Director of ERRD received a letter from the NJDEPE, Division of Responsible Party Site Remediation requesting that the EPA stabilize the site by sampling, characterizing, over-packing and disposing of all of the containerized material, as well as, sampling the soil in areas observed to have been affected by spilled material.

2. Potential for continued state/local response

Timely action will not be undertaken by NJDEPE or any local government.

III. THREAT TO PUBLIC HEALTH, OR WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to the Public Health or Welfare

The conditions at the EEP site meet the requirements of 40 CFR 300.415 of the National Contingency Plan (NCP) for a CERCLA removal action in that there exists:

(1) Actual or potential exposure to hazardous substances, or pollutants, or contaminants by nearby populations [300.415(b)(2)(i)];

According to laboratory analysis of the seven samples collected on July 14, 1992, the following hazardous chemicals and concentrations are all present on-site:

SLUDGE (mg/kg)

| Substance | EE001 | EE002 | EE006 | EE007 |
|----------------|----------|--------|---------|-------|
| Toluene | 810 | 450 | 1,600 | ND |
| Ethyl Benzene | 25,000 | 13,000 | 6,500 | ND |
| Xylene (Total) | 140,000J | 60,000 | 100,000 | ND |
| Naphthalene | ND | 310J | 27,000 | ND |
| RCRA-Ignitable | NA | NA | >200°F | 162°F |

SLUDGE/LIQUID (mg/l)

| Substance | EE003 | EE004 | EE005 |
|----------------|----------|-------|-------|
| Toluene | 6,800 | 500J | 440 |
| Ethyl Benzene | 220,000J | 1,300 | 660 |
| Xylene (Total) | 630,000J | ND | 3,200 |
| Styrene | ND | 4,900 | ND |
| RCRA-Ignitable | 84°F | 125°F | 128°F |

NA - not analyzed; ND - not detected; J - estimated

NOTE: EE001 and EE002 are sludge duplicates

EE004 and EE005 are liquid duplicates

Each of the materials listed above are CERCLA designated Hazardous Substances, as listed in 40 CFR Table 302.4. A liquid is considered RCRA characteristic for ignitability at less than 140°F. The analytical data presented above is a summary of the most significant data available from the aforementioned reports. A threat of exposure through direct human contact with the abandoned drums containing the above listed hazardous substances exists. The effect of these chemicals are tabulated below.

| SUBSTANCE | POISON | EYE/SKIN IRRITANT | NERVOUS SYSTEM | MUTAGENIC | LIVER |
|---------------|--------|-------------------|----------------|-----------|-------|
| TOLUENE | X | X | X | X | |
| ETHYL BENZENE | | X | | | |
| XYLENE | X | X | | | |
| NAPHTHALENE | X | X | | | X |

(2) Hazardous substances, or pollutants, or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release [300.414(b)(2)(iii)];

According to an inventory of drums developed by EPA, there are approximately 40, 55-gallon drums and 65, 5-gallon or smaller containers present at this site. The majority of the containers appear to contain paint sludge and resins. Similar observations were made by the NJDEPE during an August 29, 1991, site visit. A number of the drums contain solidified material. Several appear to have leaked in the past. If releases of the hazardous substances continue, the affected population could be subjected to the medical disorders cited above.

(3) Threat of fire or explosion [300.415(b)(2)(vi)];

If a fire or explosion were to occur, the nearby residents and the students of Clayton High School would be at risk, by the direct threat of fire and/or explosion and also by the toxic air plume.

(4) High levels of hazardous substances or pollutants or contaminants in soil largely at or near the surface, that may migrate [300.415(b)(2)(iv)];

The mechanism for past releases at EEP appears to have been spills, and improper storage practices. The mechanism for future releases to the air and soil include deterioration of the containers, and improper disturbance of the containers by the property owners or

trespassers. A release of the organic solvents present in these drums could migrate through the soil and impact the residential potable water supplies of the nearby homes.

(5) The availability of other appropriate federal or state response mechanisms to respond to the release [300.415(b)(2)(vii)].

Since no other federal, state or local government is able to undertake any timely response action, the NJDEPE requested the EPA to take an action.

B. Threats to the Environment

Hazardous substances, particularly volatile organic compounds, are present in a number of the containers at the site. Some leakage from the drums appears to have taken place in the past. When the EPA sampling was performed on July 14, 1992, a leaking 55-gallon steel drum, lying on its side, was sampled and field tested positive for flammability. The soil in this area is sandy, increasing the potential for migration of contamination into the subsurface and the groundwater. Homes in the area use potable wells for their water supply.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to the public health or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COST

A. Proposed Actions

1. Proposed action description

The proposed scope of work under this Action Memorandum is to overpack, stabilize, restage and sample the deteriorated drums, containers and heavily contaminated soil beneath the drums. These actions will be followed by identifying separate waste streams and disposal of the drums and containers in accordance with EPA off-site policy.

This action will ensure the stability of the site and significantly reduce the potential for direct contact and release of a toxic air plume. This will be done by fencing and posting signs at the site, overpacking and staging the containers. Categorization and sampling of the containers will also be performed. The drums will be secured on site until laboratory results of samples are received. Disposal will follow based upon the foregoing findings of fact and

conclusion of the sampling results. Upon completion of this removal action there will be no need for any post removal site control measures.

2. Contribution to remedial performance

The proposed removal action at the EEP site is consistent with the requirement of Section 104(a)(2) of CERCLA, which states that "any removal action undertaken... should, to the extent... practicable, contribute to the efficient performance of any long term remedial action with respect to the release or threatened release concerned." Since any remedial action undertaken would encompass the work items in this removal action, the cleanup effort is consistent with any future remedial work.

3. Description of alternative technologies

Disposal options for the hazardous materials present on site will be investigated thoroughly. The method of disposal will be selected based on effectiveness, implementability and cost.

4. Engineering evaluation/cost analysis (EE/CA)

Since this is a time-critical removal action, this section does not apply.

5. Applicable or relevant and appropriate requirements (ARARS)

ARARS that are within the scope of this removal action which pertain to the fencing, over-packing, stabilization, restaging, categorizing and disposal of the deteriorated drums, containers and heavily contaminated soil, will be met to the extent practicable.

Federal ARARS determined to be practicable for the EEP Site are the Resource Conservation and Recovery Act, Occupational Safety and Health Act and Hazardous Materials Transportation Act.

6. Project schedule

The removal action at the site will begin upon approval of this Action Memorandum. The anticipated duration of the initial on-site activity is approximately one month to prepare the materials for disposal. When the waste is accepted for disposal, the ERCS contractor will be remobilized for approximately one month to complete the project.

B. Estimated Costs

The estimated costs for the completion of this project are summarized below. A detailed cost estimate is included as Appendix B.

Extramural Costs:

| <u>Regional Allowance Costs:</u> | <u>Proposal Ceiling</u> |
|--|-------------------------|
| Total Estimated Cleanup Contractor Cost (ERCS) (includes 20% contingency) | \$ 161,890 |
| Other Extramural Cost Not Funded from the Regional Allowance | |
| Total TAT, incl. multiplier costs | \$ 24,200 |
| Subtotal Extramural Cost | \$ 186,090 |
| Extramural Costs Contingency (15% of Subtotal, Extramural Costs; rounded to nearest thousand) | \$ 28,000 |
| TOTAL, EXTRAMURAL COSTS | \$ 214,090 |
| <u>Intramural Costs:</u> | |
| Intramural Direct Costs | \$ 6,600 |
| Intramural Indirect Costs | \$ 20,000 |
| TOTAL, INTRAMURAL COSTS | \$ 26,600 |
| TOTAL, REMOVAL PROJECT CEILING ROUNDED | \$241,000 |

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action to remove the hazardous substances present in the drums and on the surface soils will increase the potential for further releases to occur. This, in turn, could impact the groundwater and increase the potential for a fire due to arson, vandalism or incidental trespassing. This would also result in the potential exposure of the public to hazardous substances at concentrations that may result in adverse health effects.

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

EPA has not taken any enforcement actions to date. The Office of Regional Council has been notified of the site and the search for


PRPs is ongoing. Section II.C.1 discusses the enforcement activities undertaken by the NJDEPE to date. At this time, no viable PRPs have been identified that can and will perform the proposed response promptly and properly. Efforts to locate PRP's will continue throughout the removal action to support cost recovery efforts and possible PRP involvement in any future response actions.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Edwards and Eastlack Property Site, developed in accordance with CERCLA as amended, and not inconsistent with the NCP. This decision is based on the administrative record for the site. Conditions at this site meet the NCP section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed removal action. The total estimated project ceiling if approved will be \$ 241,000 of which an estimated \$162,000 will be funded from the Regional removal allowance.

There are sufficient funds in our current Advice of Allowance to fund this cleanup.

Your signature indicates approval of the Removal Action for the Edwards and Eastlack site, per current Delegation of Authority.

APPROVAL:  DATE: 3/19/93
George Pavlou, Acting Director
Emergency and Remedial Response Division

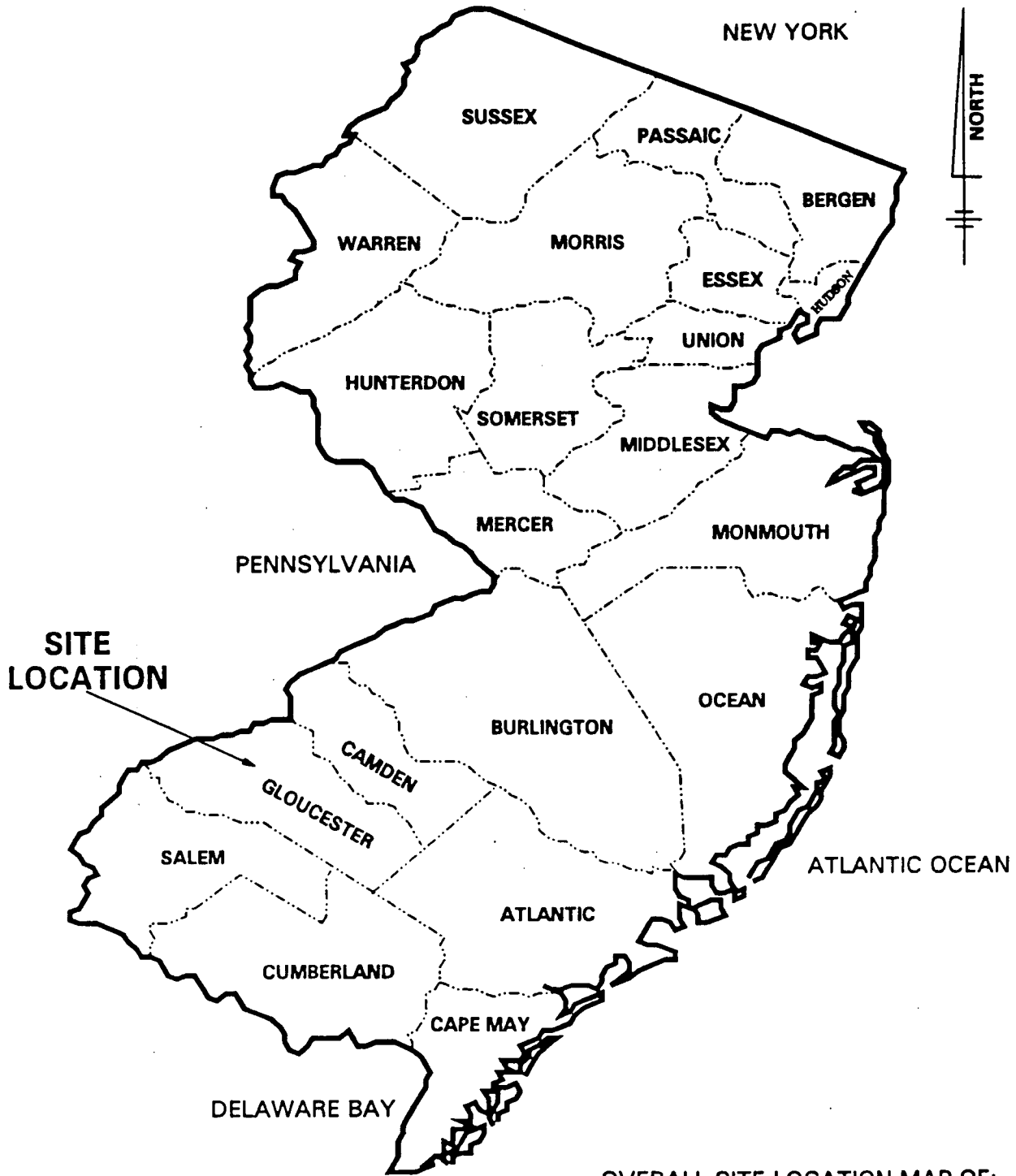
DISAPPROVAL: _____ DATE: _____
George Pavlou, Acting Director
Emergency and Remedial Response Division

cc: (after approval is obtained)

W. Muszynski, RA
R. Salkie, ERRD-ADREPP
G. Zachos, ERRD-RAB
M. Pane, ERRD-RAB-A
J. Witkowski, ERRD-RAB-TSS
J. Frisco, ERRD-DDNJP
J. Marshall, EPD
C. Moyik, ERR-PS
J. McVeigh, ORC-NJSUP
R. Gherardi, OPM-FIN
D. Johnson, OPM-FAM
D. Dietrich, 5202G
T. Grier, 5202G
L. Miller, NJDEPE
D. Triggs, NJDEPE
C. Kelley, TATL

APPENDIX A

- 1. MAPS**
- 2. Request Letter**



OVERALL SITE LOCATION MAP OF:
EDWARDS & EASTLACK PROPERTY
 FRANKLINVILLE, NEW JERSEY
 DWN. NOT TO SCALE



Roy F. Weston, Inc.
 MAJOR PROGRAMS DIVISION

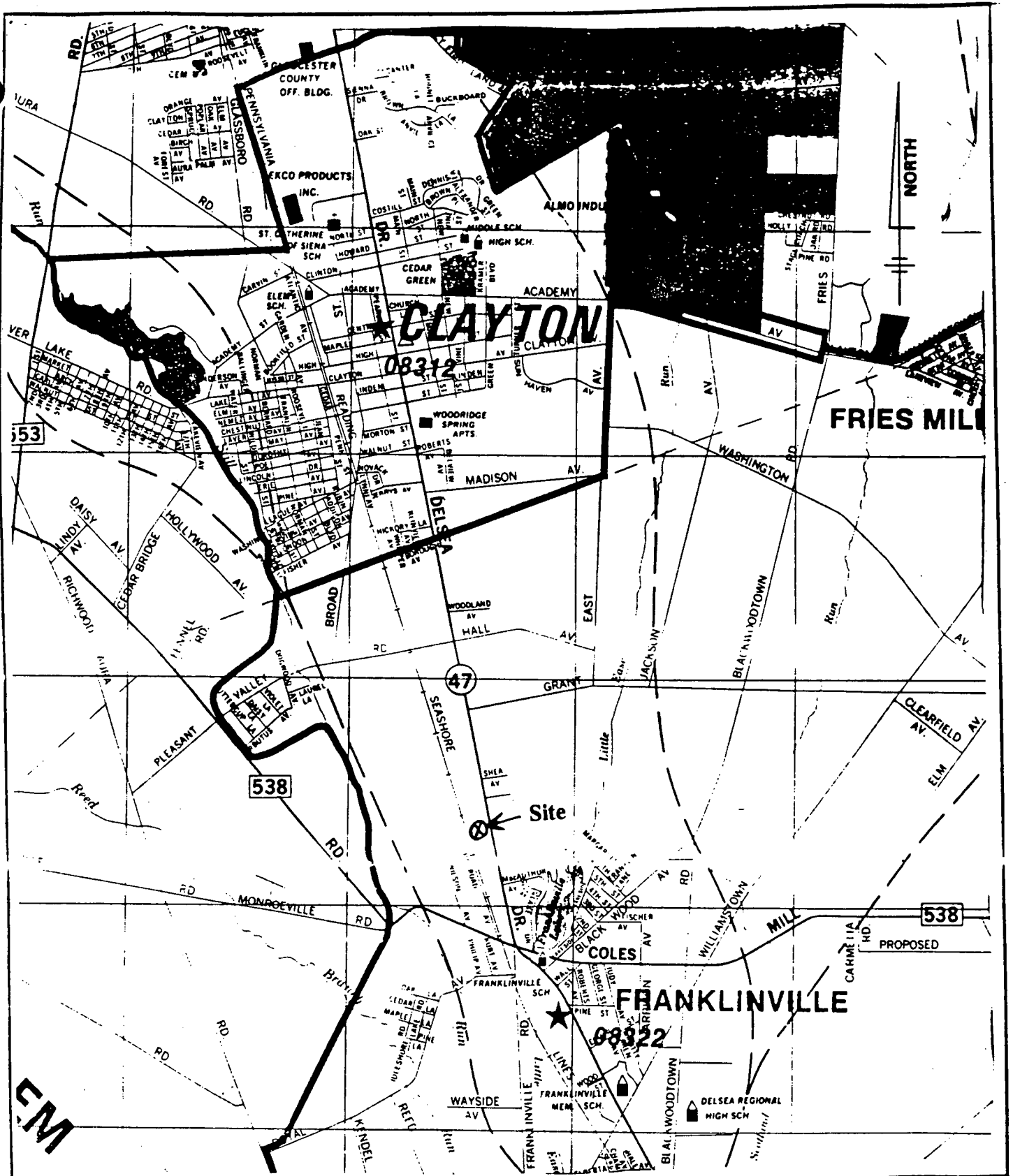
EPA PM
 G. TAWADROS

Location Map
 Figure I

IN ASSOCIATION WITH FOSTER WHEELER CORP.,
 C.C. JOHNSON & MALHOTRA, P.C., RESOURCE
 APPLICATIONS, INC. AND R.E. SARRIERA ASSOCIATES

TAT PM
 D. DELAP

Edwards &
 Eastlack



Roy F. Weston, Inc.
MAJOR PROGRAMS DIVISION

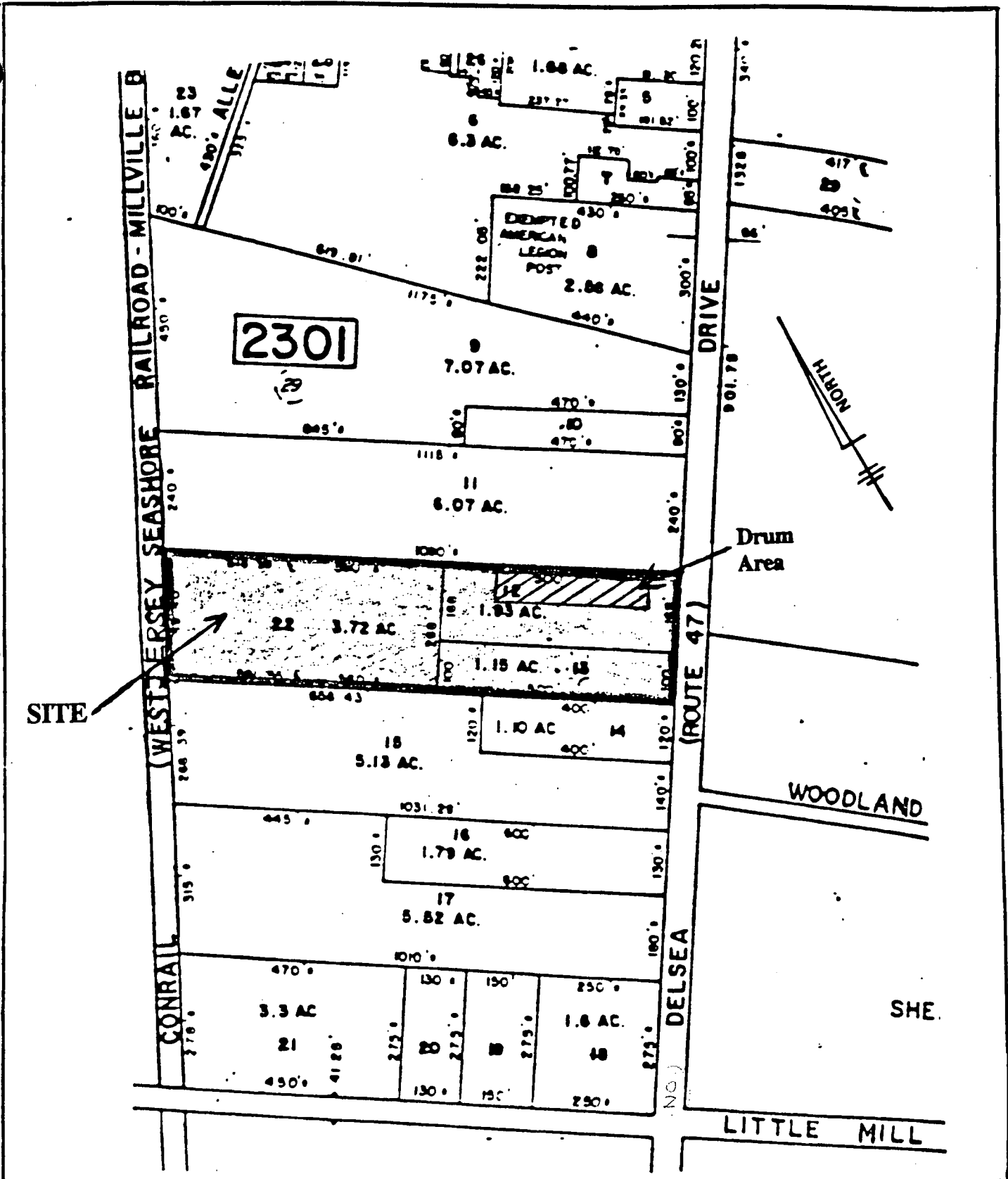
EPA PM
G. Tawadros

Location Map
Figure 2

IN ASSOCIATION WITH FOSTER WHEELER CORP.,
C.C. JOHNSON & MALHOTRA, P.C., RESOURCE
APPLICATIONS, INC. AND R.E. SARRIERA ASSOCIATES

TAT PM
D. Delap

Edwards &
Eastlack



Roy F. Weston, Inc.
MAJOR PROGRAMS DIVISION

EPAPM
G. Tawadros

Site Layout
Figure 3

IN ASSOCIATION WITH FOSTER WHEELER CORP.,
C.C. JOHNSON & MALHOTRA, P.C., RESOURCE
APPLICATIONS, INC. AND R.E. SARRIERA ASSOCIATES

TATPM
D. Delap

Edwards &
Eastlack



State of New Jersey
Department of Environmental Protection and Energy
Division of Responsible Party Site Remediation

CN 028
Trenton, NJ 08625-0028
Tel. # 609-633-1408
Fax. # 609-633-1454

Scott A. Weiner
Commissioner

Karl J. Delaney
Director

JUN 4 1992

Kathleen C. Callahan
Emergency and Remedial Response Division
U.S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

RE: Removal Request - Edwards and Eastlack Property
689 North Delsea Drive
Franklin Township, New Jersey

Dear Director Callahan:

The New Jersey Department of Environmental Protection and Energy (NJDEPE) hereby submits the Edwards and Eastlack Property for CERCLA removal action consideration. The following information details the case history and supports the removal request.

The Edwards and Eastlack Property is a vacant lot that was once the site of an auto body repair shop and camper dealership (Dick's Camper Sales) owned and operated by Ruth and William Dick from the early 1970s to the mid 1980s. The 5-acre site, listed as Block 2301; Lots 12, 13 and 22, is situated in a residential/rural section of Franklin Township, Gloucester County. The property was purchased in 1986 by Ms. Jeanette Edwards of Sewell, New Jersey, who later granted William Eastlack, also of Sewell, co-ownership.

While cleaning brush from a section of their property in the summer of 1991, Edwards and Eastlack uncovered approximately forty 55-gallon drums in various states of deterioration. Upon notification by the property owner's attorney Joseph Alacqua, the NJDEPE, Bureau of Field Operations, Southern Field Office investigated the incident on August 29, 1991, confirming the presence of thirty-nine 55 gallon drums, one 30 gallon drum, sixty-two 5 gallon steel pails and one plastic pail. Although the contents of the drums was unknown, a paint-like odor was detected and a bright solid pigment-like material was observed on the ground near the containers. The situation was considered a non-emergency.

Ms. Edwards claims to have had no knowledge of the well-hidden drums upon purchasing the property. Efforts to contact the previous owner, Ruth Dick of Sumter, North Carolina, have been met without success. A formal letter and Notice of Violation issued to Edwards and Eastlack on September 9, 1991 was likewise unresponsive as the current property owners claim to have insufficient funds to conduct the cleanup.

Entry onto the property and near the exposed and abandoned drums is unrestricted. The nearest resident may be a renter on site in a building said to be under renovation at the time of the initial Departmental investigation. In addition, Route 47 runs along the eastern property boundary with Clayton Highschool 1.5 miles to the northwest. The Department views the unstable containers as a threat to human health and the environment as the contents remain unknown and improperly contained.

The Department requests that EPA stabilize the site by sampling, characterizing, overpacking and disposing of all of the containerized material as well as sampling the soil in areas observed to have been effected by spilled material.

Should your staff require additional information, please have them contact David Triggs of the Bureau of Field Operations at (609) 584-4289.

Very truly yours,

Original Signed by
Karl Delaney

Karl J. Delaney
Director

c: Richard Salkie, USEPA
George Zachos, USEPA
Assistant Director Howitz, Discharge Response Element
Chief Van Fossen, Bureau of Field Operations
Section Chief Downey, Southern Field Office

Yellow

APR 02 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Jeannette Edwards
RD 2, Box 272
Sewell, New Jersey 08080

Re: Edwards and Eastlack Property Site
689 North Delsea Drive, Franklinville, Gloucester County,
New Jersey
Notice of Potential Liability

Dear Ms. Edwards:

The United States Environmental Protection Agency ("EPA") is charged with responding to the release or threatened release of hazardous substances, pollutants, and contaminants into the environment and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), as amended, 42 U.S.C. §§9601-9675. EPA has documented the release or threatened release of hazardous substances, pollutants and contaminants into the environment at the Edwards and Eastlack Property Site ("Site"), located in Franklinville, Gloucester County, New Jersey. Pursuant to CERCLA, EPA has spent public funds and intends to spend additional public funds on investigative and corrective measures necessary to control such releases or threatened releases.

Under CERCLA and other laws, potentially responsible parties ("PRP") may be held liable for monies expended by the federal government in taking response actions at and around sites where hazardous substances have been released, including investigative, planning, removal, remedial and enforcement actions. PRPs may also be subject to orders requiring them to take response actions themselves. Under CERCLA, PRPs include current and past owners or operators of the Site as well as persons who generated hazardous substances or were involved in the transport, treatment, handling or disposal of such substances at the Site.

| SYMBOL ----> | ERRD/PSB | ERRD/PSB | ERRD/RAB | ERRD/RAB | ERRD/RAB | ORC/NJSUP | ERRD/AD | |
|--------------|--------------------|-------------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|--|
| SURNAME --> | Becker | Pitruzzello | Graham | Pane | Zachos | Stamatakis | Salkie | |
| DATE -----> | <i>[Signature]</i> | <i>[Signature]</i> 3/25 | <i>[Signature]</i> 3-24-93 | <i>[Signature]</i> 3-24-93 | <i>[Signature]</i> 3/24/93 | <i>[Signature]</i> 3/26/93 | <i>[Signature]</i> 3/24/93 | |

Edwards

E.E-3001-1008

Pursuant to Section 107(a) of CERCLA, 42 U.S.C. §9607(a) EPA hereby notifies you that EPA considered you to be a PRP with regard to this Site. Notice of liability for the Edwards and Eastlack Property Site does not constitute a final determination by EPA concerning the liability of any party for the release or threatened release of hazardous substances at the Site.

The Site is located in an area of mixed industrial and residential land use. The western side of the Site is bordered by the Empire Container Corporation, and a small junkyard is located to the north. The nearest residence is approximately 500 feet away. Clayton High School is located approximately 1.5 miles west of the Site.

EPA investigations have revealed the presence of approximately 40 55 gallon drums and numerous smaller containers all in deteriorated condition. The containers hold a variety of materials including paint sludges, resins and organic solvents. Analysis of these materials indicate the presence of hazardous substances within the meaning of Section 101(14) of CERCLA, 42 U.S.C. §9601(14). EPA investigation also revealed that there is an ongoing release or and/or threatened release of CERCLA hazardous substances from the containers into the environment at the Site. As a result, EPA has determined that a removal action pursuant to Section 104 of CERCLA, 42 U.S.C. §9604 is necessary to mitigate the release or threatened release of hazardous substances, pollutants or contaminants from the Site that may present an imminent and substantial danger to public health or welfare, or the environment.

Please be advised that removal activities are to include, but not be limited to, the following: Sampling and analysis, waste profiling all materials and containers, and searching for additional drums/chemical containers that may be uncovered as debris is removed. As the waste streams become fully documented, the materials would be staged, bulked, and shipped for disposal.

Pursuant to Section 113(k) of CERCLA, EPA has established an Administrative Record file containing documents that form the basis of EPA's decision on the selection of a response action for this Site. The Administrative Record is located at EPA's Region II Edison Facility, 2890 Woodbridge Avenue, Edison, New Jersey 08837.

Under CERCLA Section 122(e), EPA has the discretionary authority to invoke special notice procedures to formally negotiate the terms of an agreement between EPA and a PRP to conduct or finance response activities. In this case EPA has decided not to invoke the Section 122(e) special notice procedures because the present conditions at the Site present a significant threat to the public health or welfare, or the environment.

By issuance of this letter, EPA wishes to determine whether you are willing to conduct the necessary removal action at the Site. If you are interested in entering into an agreement with EPA to perform the removal action, you must notify EPA of your intention to enter into negotiations as soon as possible. Said Notice of Intent must be in writing and received by EPA within fourteen (14) business days from receipt of this letter.

Your written response should be sent to Mr. Don Graham, the On-Scene Coordinator for the Site, at U.S. EPA, Region II, 2890 Woodbridge Ave., Bldg. 209, Edison, New Jersey 08837. A copy should also be sent to Mr. Evans Stamatakis, Assistant Regional Counsel, U.S. EPA, Region II, 26 Federal Plaza, Rm 309, New York, New York 10278.

If EPA does not receive a written Notice of Intent within the time specified, EPA will assume that you have declined to meet with EPA and/or voluntarily undertake performance of the required removal action. In which case, EPA will take other enforcement actions which may include, but not be limited to, issuance of a unilateral order against you to perform the required removal actions.

Should you have any further questions, please contact Mr. Graham at (908)321-4345 or have your attorney contact Mr. Stamatakis at (212)264-3415. We urge you to give this matter your immediate attention.

Sincerely yours,

Richard Salkie, Associate Director
Emergency and Remedial Response Division

GILLEN

APR 02 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William Eastlack
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Sewell, New Jersey 08080

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| DATE -----> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | |
| | 3/23/93 | | 3-24-93 | 3-24-93 | 3/24/93 | 3/24/93 | 3/24/93 | |

EE-3002-2003

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