



# **FORMER KIL-TONE COMPANY SUPERFUND SITE**

## **PROPOSED PLAN PUBLIC MEETING Operable Unit Two Non-Residential Soil**

**August 13, 2019**



# Agenda

- Welcome
- Introductions
- EPA & Superfund Program
- Site History
- Investigations
- Remedial Alternatives Considered
- EPA's Preferred Alternative
- Next Steps
- Questions & Comments

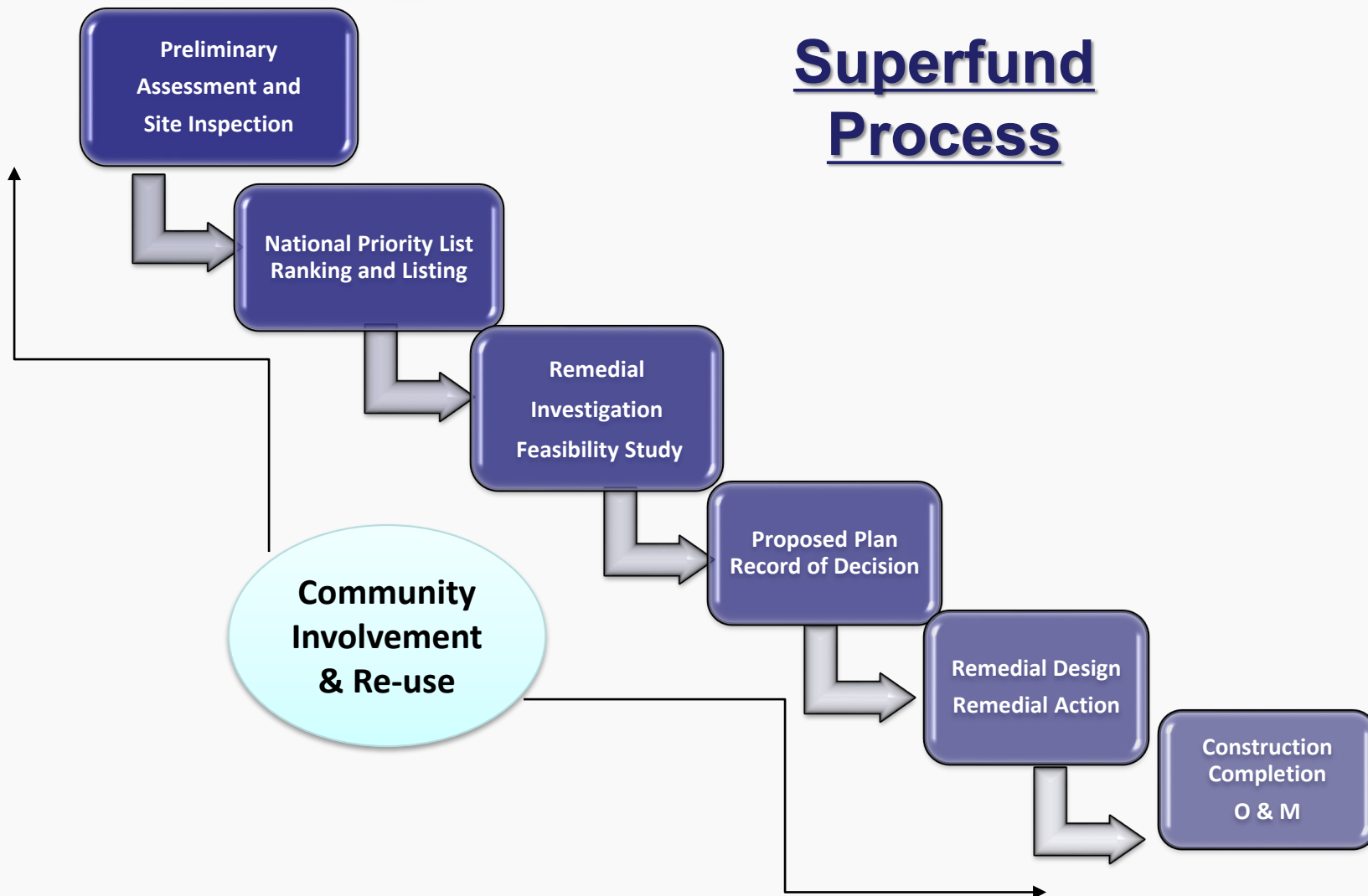


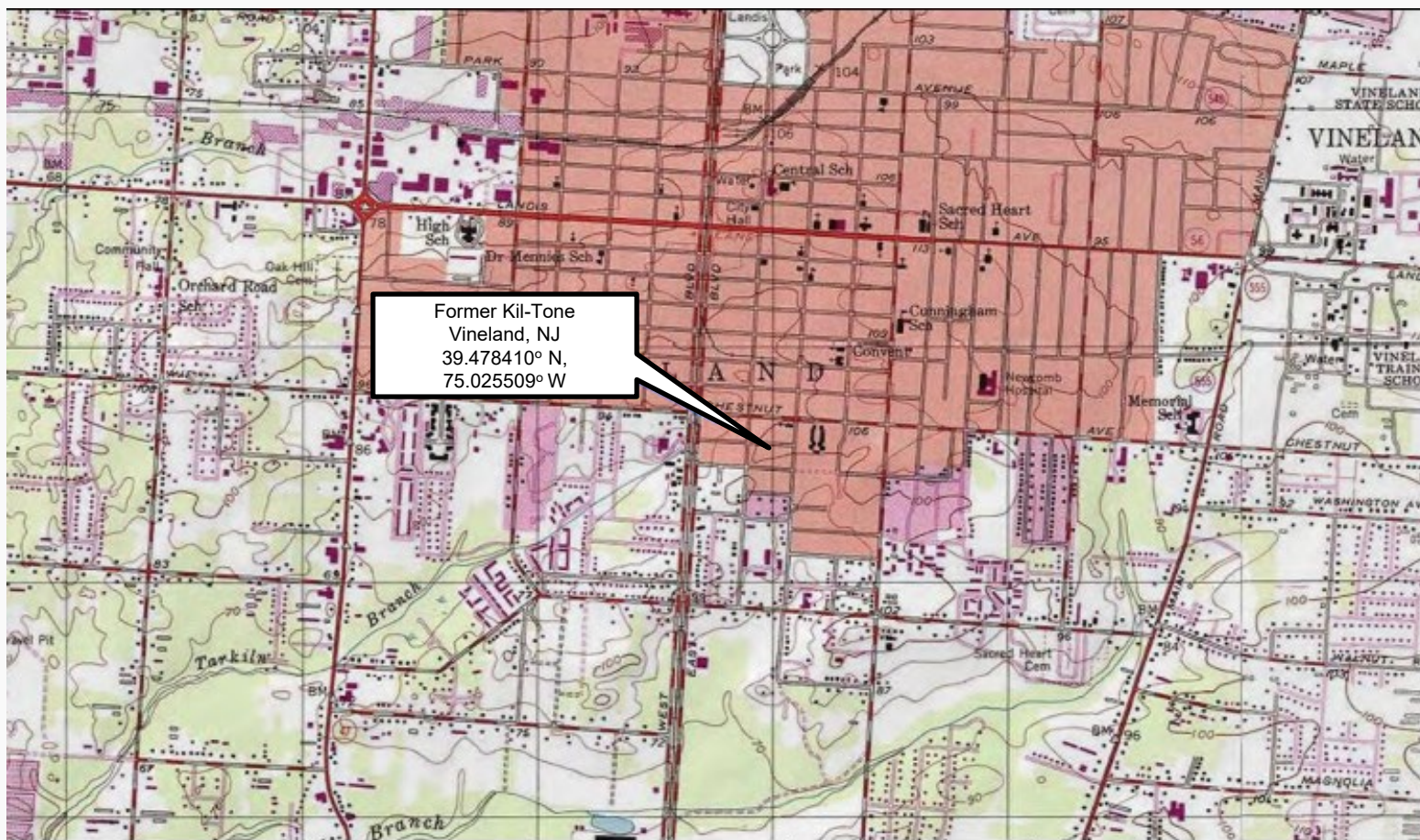
## **Why are we here tonight?**

- To discuss EPA's Proposed Remedial Action Plan for Operable Unit two of the Former Kil-Tone Company Superfund Site – Non-Residential Properties
- EPA will be accepting written and verbal comments until Wednesday, August 28<sup>th</sup>, 2019.
- All public comments will be considered and included formally in the Administrative Record.
- EPA will assess public comments in its Record of Decision Responsiveness Summary.

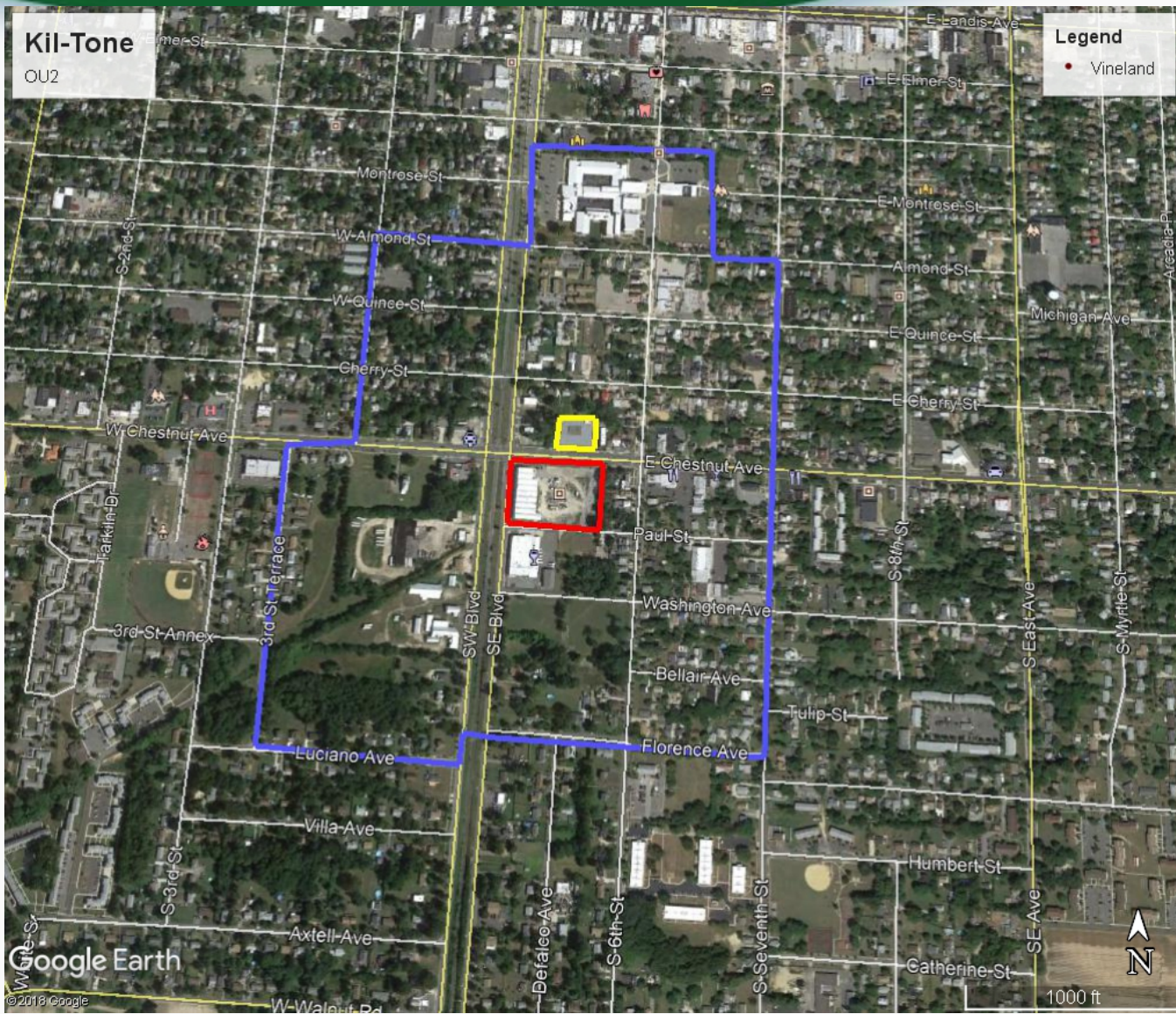


# Superfund Process









MAP LOCATION



Former Kil-Tone Facility



Lerco Fuel Company



Approximate Site Boundary



IMPROVED  
KIL-TONE

MODIFIED  
KIL-TONE

# KIL-TONE

## AGRICULTURAL SPRAYS AND CHEMICALS



SULPHO  
ARSENATE



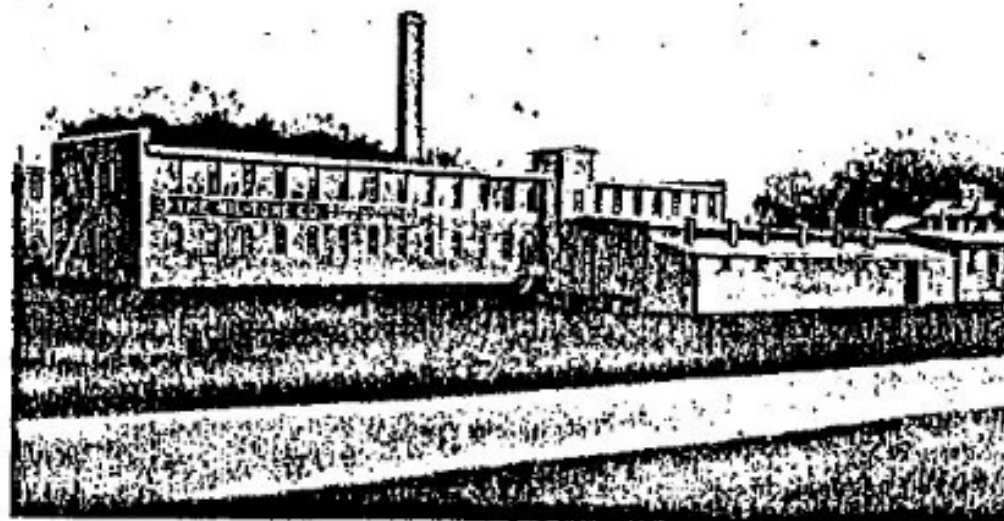
BEEBLEMORT  
POWDER



GREEN CROSS  
ARSENATE  
OF LEAD



FRUIT  
KIL-TONE  
FLY SKAT



NORTHEAST BUILDING

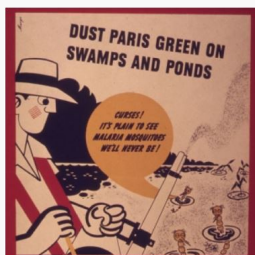
THE KIL-TONE COMPANY :: Vineland, New Jersey





## Site Background

- The former Kil-Tone Company began operations at the property on or about 1917.
- Arsenic and lead-based pesticides were manufactured at the former Kil-Tone facility from 1917 until 1933.
- Specific compounds included lead arsenate, London purple, Paris green, copper lime calcium arsenate dust.
- The property is currently occupied by a sign manufacturing and installation company.
- Cleanup of a fuel distribution facility across the street triggered an investigation of the former Kil-Tone property in 2014.







## **Early Response Actions**

- August 2014 - NJDEP investigation
- November 2014 – NJDEP refers the site to EPA
- January 2015 – February 2016 – EPA Removal Program conducts sampling in the vicinity of the former facility property
- March 2016 – EPA conducts removal action to provide temporary protection at properties that exceed removal action levels
- April 2016 – Site is added to the National Priorities List





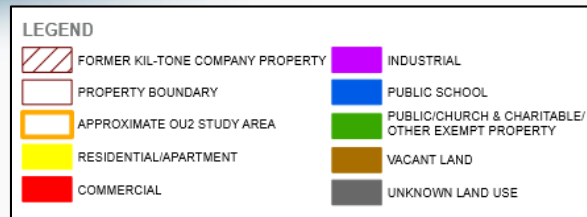
## **Operable Units**

- A site can be divided into a number of distinct areas depending on the complexity of the problems associated with the site.
- These areas may address geographic areas of a site, specific site problems, or areas where a specific action is required.

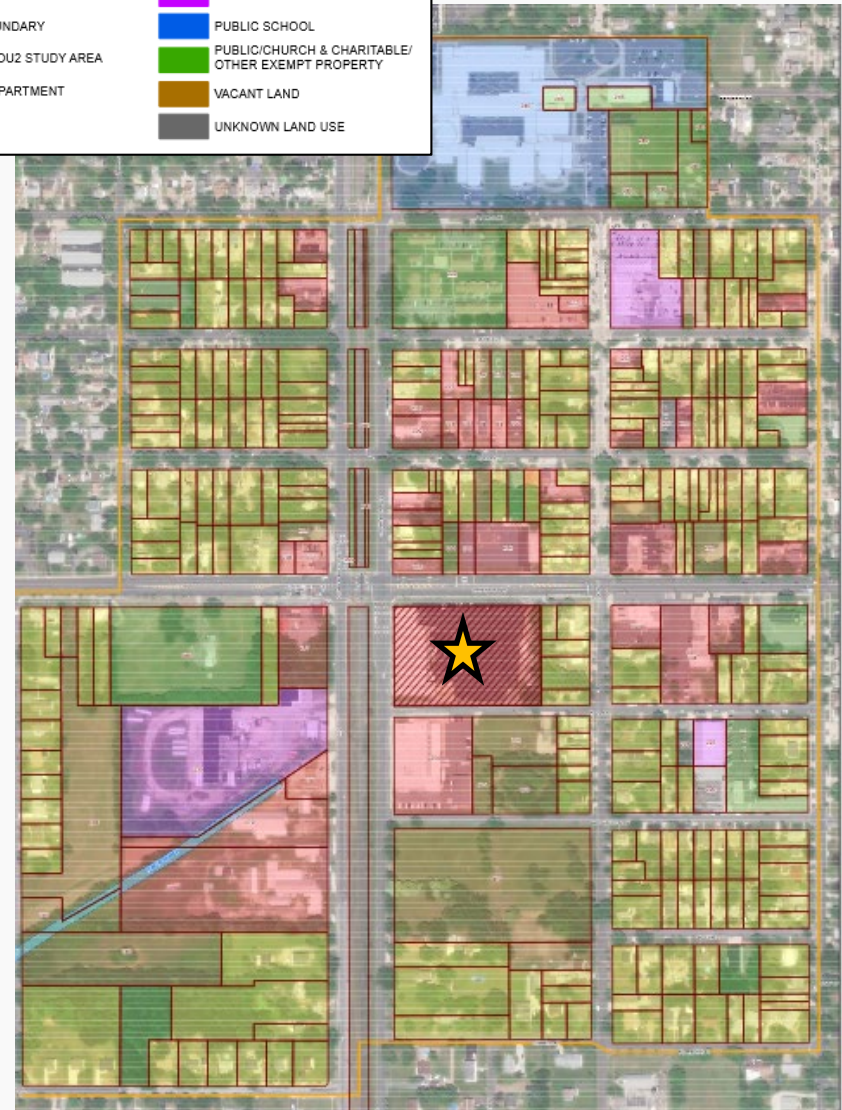




# Operable Units



- *Operable Unit 1: Residential Properties in the vicinity of the former Kil-Tone facility – Clean-Up Ongoing*
- *Operable Unit 2: Non-Residential Properties in the vicinity of the former Kil-Tone facility* ★
- *Operable Unit 3: Groundwater in the vicinity of the former Kil-Tone facility*
- *Operable Unit 4: Tarkiln Branch sediment and adjacent properties*



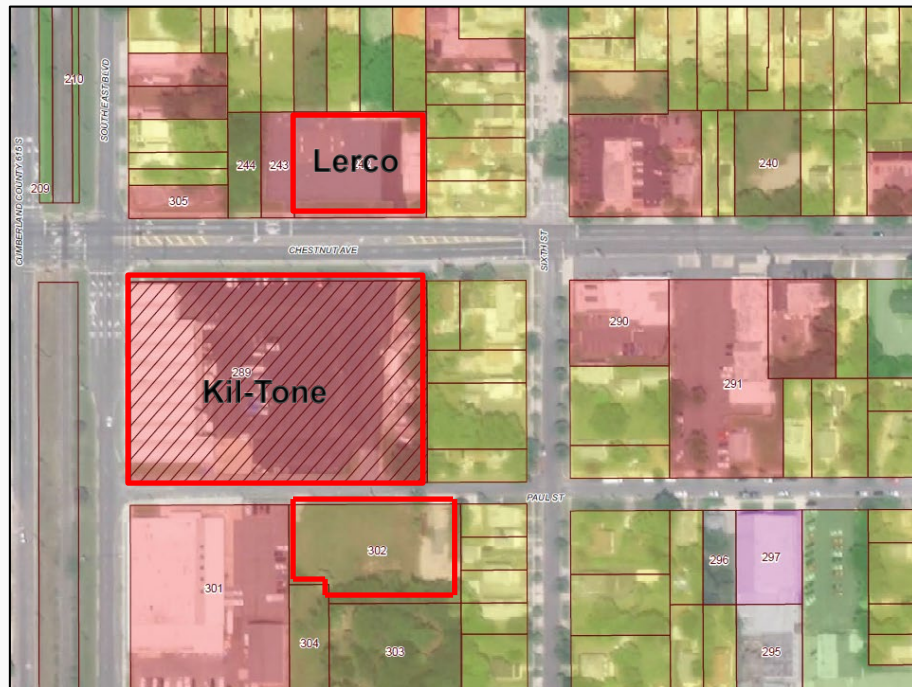


## **Operable Unit 2 Investigations and Studies**

- Remedial Investigation (RI) – Finalized in 2018
  - Characterizes site conditions
  - Determines the nature and extent of contamination
  - Assesses risk to human health
  
- Focused Feasibility Study (FFS) – Finalized in 2019
  - Develops potential remedial alternatives
  - Screens remedial alternatives for effectiveness
  - Evaluates remedial alternatives against each other



## Tier A Soil Sampling

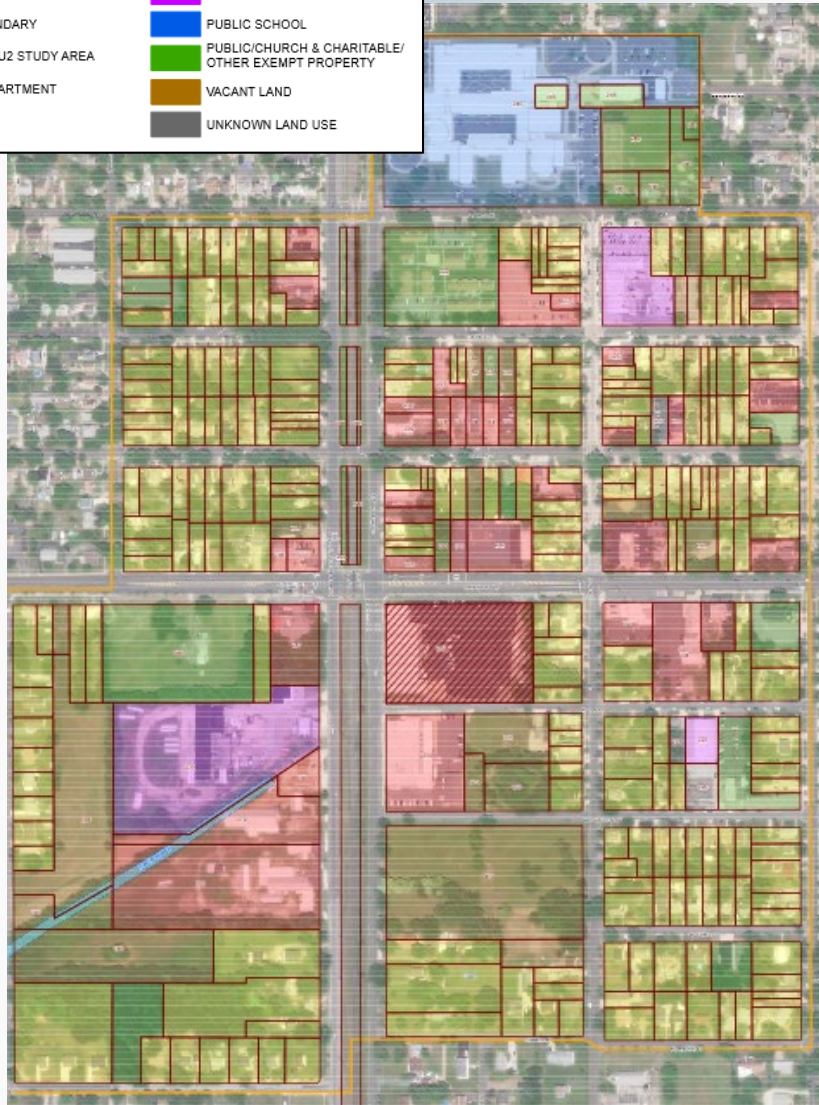
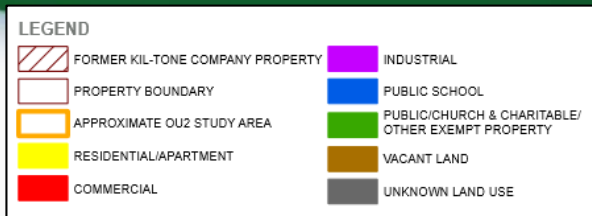


### LEGEND

 FORMER KIL-TONE COMPANY PROPERTY	 INDUSTRIAL
 PROPERTY BOUNDARY	 PUBLIC SCHOOL
 APPROXIMATE OU2 STUDY AREA	 PUBLIC/CHURCH & CHARITABLE/ OTHER EXEMPT PROPERTY
 RESIDENTIAL/APARTMENT	 VACANT LAND
 COMMERCIAL	 UNKNOWN LAND USE

- Conducted in August 2017
- Sampling included the former Kil-Tone facility and the Lerco property
- Surface and subsurface soil samples collected throughout these properties and analyzed for the full suite of potential contaminants
- Purpose
  - Determine which contaminants present in soil are related to the operations of the Former Kil-Tone Company
  - Data also used to determine nature and extent of contamination on the properties





## Tier B Soil Sampling

- Conducted between September 2017 and March 2018
- Sampled approximately 50 non-residential properties in the vicinity of the former Kil-Tone facility
- Analyzed samples for metals and Polycyclic Aromatic Hydrocarbons (PAHs)



## Investigation Findings

Former Kil-Tone property:

- Arsenic in soil up to 45,900 mg/kg
- Lead in soil up to 91,700 mg/kg
- Elevated concentrations found at some locations below the depth of the groundwater table

Other OU2 Properties:

- Arsenic in soil up to 15,900 mg/kg
- Lead in soil up to 16,100 mg/kg
- Concentrations of lead and arsenic in soil decrease with distance from the former Kil-Tone property.
- Elevated concentrations generally found in shallow soil (above 4 feet below ground surface), but in some cases deeper





## **Risk Assessments**

- Human Health Risk
  - Risks to current and potential future workers and residents were assessed
  - Both cancer risks and non-cancer hazards exceeded EPA's acceptable risk levels due to arsenic in soil
  - Risks due to lead in soil also exceeded EPA's regional target
- Ecological Risk
  - Screening level assessments found arsenic and lead pose the potential for adverse effects to terrestrial plants and soil invertebrate communities
- Since unacceptable risks are present, a remedial action must be taken





## **OU2 Remedial Action Objectives**

- Remedial Action Objectives – Specific cleanup goals for a Superfund site that ensure the protection of human health and the environment.
  - Prevent current and potential future unacceptable risks to human receptors resulting from direct contact with contaminated soil;
  - Prevent migration of contaminants of concern (COCs) from the OU2 properties to other areas via overland flow and air dispersion;
  - Prevent or reduce the migration of COCs from soil to groundwater; and
  - Prevent current and potential future unacceptable risks to ecological receptors resulting from direct contact with contaminated soil.



## Soil Cleanup Goals

COC	Non-Residential (mg/kg)	Residential (mg/kg)	Impact to Groundwater (mg/kg)	Plant – LOEL (mg/kg)	Soil Invertebrates – LOEL (mg/kg)
Arsenic	19	19	19	69	93.7
Lead	800	400	Pending	500	3,162

- Residential or non-residential lead remediation standards will be applied on a case-by-case basis
- Based on conversations with the City of Vineland, most of the properties could potentially be zoned as residential in the future



## Proposed Plan

### Remedial Alternatives

- **Alternative #1** – No Action
- **Alternative #2** – Engineering Controls (Capping/Access Control) and Institutional Controls
- **Alternative #3** – Excavation to Groundwater Table, Engineering Controls and Institutional Controls
- **Alternative #4** – Excavation Below Groundwater Table, Engineering Controls and Institutional Controls





# **The Nine Evaluation Criteria**

## **Threshold Criteria**

- Overall Protection of Human Health and the Environment
- Compliance with Applicable or Relevant and Appropriate Standards

## **Balancing Criteria**

- Long-Term Effectiveness and Permanence
- Reduction of Toxicity, Mobility and Volume through Treatment
- Short-Term Effectiveness
- Implementability
- Cost

## **Modifying Criteria**

- Community Acceptance
- State Acceptance



## Comparison of Alternatives

Alternative	Estimated Quantity of Excavated Soil	Cost Estimate	Estimated Timeframe
Alternative 1	0	\$0	0
Alternative 2	8,650 cubic yards	\$8.1 million	15 months
Alternative 3	57,800 cubic yards	\$36 million	35 months
Alternative 4	86,600 cubic yards	\$58.4 million	50 months



## **Preferred Alternative: Alternative 3**

- **Excavation to Depth of Contamination (not to exceed depth of groundwater table), Engineering Controls and Institutional Controls**
  - Excavation of soil in exceedance of the appropriate property-specific soil remediation standard
  - Off-site disposal of excavated soil
  - Institutional controls
  - Long-term monitoring



## **Preferred Alternative: Alternative 3**

- Provides protection of human health and the environment by removing contaminated soil
- Meets RAOs and achieves property-specific soil cleanup standards
- Relies less heavily on institutional controls than Alternative 2
- More cost-effective and easily implementable than Alternative 4





## **Next Steps**

- Reviewing and addressing public comments
- Signing the Record of Decision
- Completing the Remedial Design
- Completing the Remedial Action



# **Public Comment Period**

- July 30, 2019 through August 28, 2019
- Address written comments to:  
Sharon Hartzell, Remedial Project Manager  
U.S. Environmental Protection Agency  
290 Broadway, 18<sup>th</sup> Floor  
New York, NY 10007  
Fax: (212) 637-4132  
Email: [hartzell.sharon@epa.gov](mailto:hartzell.sharon@epa.gov)
- Verbal and written comments will be accepted during this public meeting and throughout the public comment period
- <http://www.epa.gov/superfund/former-kil-tone>