



SDMS DocID

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REILLY INDUSTRIES, INC.

300 NORTH MERIDIAN STREET
SUITE 1500
INDIANAPOLIS, INDIANA 46204-1763

TELEPHONE 317 638-7531
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May 3, 2004

Mr. Christian Matta
Remedial Project Manager
U.S. Environmental Protection Agency
General Remedial Section (3HS23)
1650 Arch Street
Philadelphia, PA 19103-2029

**RE: Administrative Order For Removal Response Action
Big John Salvage Superfund Site, Docket No. III-2000-026-DC
Bi-Weekly Report 144; April 19, 2004 through May 2, 2004**

Dear Mr. Matta,

This report is being submitted pursuant to Section VIII Paragraph 8.7 of the above referenced Unilateral Administrative Order (UAO). The remainder of this letter provides an update of activities at the site during the referenced period.

1. *A description of the response action completed and the actions that have been taken toward achieving compliance with this order.*

Activities Performed Onsite During the Reporting Period:

1. Continued to pump and treat water from East and Middle Tributaries. A total of 66,000 gallons of water were treated between April 9 and April 29, 2004 (average flow of 2.1 gpm). 3,796,900 gallons of water have been treated and discharged to the City of Fairmont wastewater treatment plant since automated system startup began on March 31, 2001.
2. Environmental Strategies visited the site on April 22, 2004 to perform routine maintenance. There were no problems with the system. Lisa Humphries of the Huntington COE and Chris Matta of USEPA accompanied ESC during that visit.
3. Environmental Strategies also visited the site on April 29, 2004 to perform debris removal and regrading in the East Tributary. Three workers from McCutcheon Enterprises assisted with this work. This work was successfully completed and included the following:

- Debris from under and around the treatment trailer was taken offsite by McCutcheon in a half-full 10 cubic yard rolloff box. They will dispose of the material as municipal waste at their Pennsylvania licensed transfer station in Apollo, PA. (a copy of the manifest for this material is attached).
 - Two drums of filter bags were taken offsite by McCutcheon. These were manifested as non-hazardous waste (testing has been completed and submitted as part of the prior bag disposal effort), and will also be taken to the Apollo facility. (a copy of the manifest for this material is attached).
 - The surface of the East Tributary was regraded and the silt fences in the immediate area were removed to reestablish sheet flow and prevent continued erosion and channel flow. Low spots and large erosion gullies that were filled and high spots were brought back to the surrounding grade. All disturbed areas were reseeded and either covered with matting or straw.
4. The removal work was done in response to your suggestion during the April 8 site visit. You recommended that Reilly remove filter bags, pipe, and other debris from under and around the treatment trailer. Reilly agreed and made arrangements to have McCutcheon Enterprises Inc. help collect, cut up (as needed) and remove all of the debris, including two drums of filter bags. McCutcheon owns a licensed transfer facility in Apollo, PA, which can receive these types of waste. McCutcheon has previously been used to remove filter bags, which were tested and found to be non-hazardous. The same profile was used for this shipment of bags. Other debris will be disposed of as non-hazardous waste, along with the bags. As previously agreed for the purposes of disposal of spent carbon, original site debris (scrap metal, timber, and belts), and the initial batch of filter bags, WVDEP and USEPA have determined that these types of site wastes are not listed wastes. The filter bags were tested and found to be non-hazardous.
5. The repair of some small erosion-related conditions that have developed in the East Tributary was considered necessary due to ponding that is limiting the ability of the system to efficiently "shed" clean surface water runoff. The work included minor regrading to fill some erosion features both within the footprint of the collection system, and on the immediate edges of it. Some of the problem was the result of erosion from the hillside above the East Tributary, where Guardian removed soil, and where large, four-foot erosion channels had formed (and deposited the sediment on the lower terrain of the collection system). This area of the upper hill was filled in to prevent further sediment runoff and channelized water flow onto the collection system. McCutcheon also removed sediment that has backed up behind the old straw erosion control devices installed by Guardian. These devices were either rotten or in disrepair and were causing ponding on top of the collection system area. Reilly also removed old silt fence along the flanks of the collection system to reestablish sheet flow and avoid further channelization. The silt fences were previously causing the flow to channel along the fence, and then discharge from it at a specific point, causing scour and erosion. No work was needed in the Middle Tributary.

6. On April 28, 2004, a contractor digging at the site under the direction of the U.S. Army COE (who was in turn working under the direction of the USEPA) dug up the power and control cables running between the treatment trailer and the East Tributary manhole. Fortunately, nobody was hurt. The contractor and COE had not been provided the map of the buried line locations by USEPA. Lisa Humphries of the COE called Doug Taylor of Environmental Strategies to report the accident. Environmental Strategies made arrangements for a McCutcheon electrician to come to the site on April 29 with the other workers. The accident had resulted in the power and control cables being pulled from the control box (from the tension through the conduit), and two of the nine wires were cut. The wires were re-pulled through the conduit and repaired. An electrical contactor in the trailer was damaged as a result of the accident and was also repaired. There was no damage to the connections at the pump, and no damage to the discharge pipe buried below the wires.
7. Environmental Strategies provided the COE a duplicate copy of the site map. A similar copy was previously provided to USEPA and Ecology and Environment showing the surveyed pipeline locations and hand drawn line for the discharge piping. COE was reminded that the pipe from the trailer to the City manhole was never surveyed.

2. *A description of all data anticipated and activities scheduled for the next period.*

Work to be performed in the next 2-week period:

1. Continue to treat water and discharge directly to the POTW via the on-site manhole.
2. Visit the site once per two-week period, unless there are reports of problems.

3. *A description of any problems encountered or anticipated.*

There was a minor problem, as described above, with an accident involving a COE contractor who cut the power line to the East Tributary manhole

4. *Any Actions taken to prevent or mitigate such problems.*

As described above, Reilly contractors repaired the problem within 24 hours of notification of the accident.

5. *A schedule for a completion of actions.*
Not applicable.

6. *Copies of all analytical data received during the reporting period.*
None

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7. *All modifications to the response action, RAP and schedule made pursuant with section XV of this order during the reporting period.*
Not applicable for this reporting period.

Please call if you have any questions about this report.

Very Truly Yours,

REILLY INDUSTRIES, INC.



John R. Jones, P.E.
Director, Regulatory Management

cc: Anne Frye (Reilly)
Thomas Bass (WVDEP)
Doug Taylor (ESC)

Enclosures: manifests

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McCutcheon Enterprises, Inc.
250 Park Road
Apollo, PA 15613
(724)568-3623 Fax (724)568-2571
www.completewastemgmt.com

ORIGINAL

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. 104528		Manifest Document No.		2. Page 1 of 1	
3. Generator's Name and Mailing Address Reilly Industries, Inc. (Big John's Salvage Site) 300 N. Mendian Street Suite 1500 Indianapolis, IN 46204-1763						A. Non-Hazardous Manifest Document No. MC17519	
4. Generator's Phone ()						B. State Generator's ID	
5. Transporter 1 Company Name McCutcheon Enterprises Inc				6. US EPA ID Number PA0013826847		C. State Trans. ID	
7. Transporter 2 Company Name				8. US EPA ID Number		D. Transporter's Phone (724-568-3623	
9. Designated Facility Name and Site Address McCutcheon Enterprises Biosolids Treatment Facility 250 Park Road Apollo, PA 15613				10. US EPA ID Number PA0013826847		E. State Trans. ID	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM						12. Containers No. Type	
a. Non-regulated Material (Rear bags and debris).						13. Total Quantity EST 00.300	
b.						14. Unit P	
c.						L Waste No. NONE	
d.							
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above	
a. 031903-00267						a.	
b.						b.	
c.						c.	
d.						d.	
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name and are classified, packaged, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations. I hereby certify that the above-named material is not hazardous waste as defined by 40 CFR Part 261 and any applicable state law.							
Printed/Typed Name DOUG TAYLOR				Signature		Month Day Year 04/23/04	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature		Month Day Year 04/29/04	
Printed/Typed Name Sam Doe				Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Month Day Year	
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name				Signature		Month Day Year	

GENERATOR COPY

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

ORIGINAL

THIS MEMORANDUM is an acknowledgement that a bill of lading has been issued and is not the Original Bill of Lading, not a copy or duplicate, covering the property named herein, and is intended solely for filing or record.									
(Carrier) <u>MET</u> SCAC. _____					Shipper's No. _____				
Received, subject to the classifications and tariffs in effect on the date of this Bill of Lading:					Carrier's No. _____				
at <u>ADDOLLO LA</u> , date <u>4/29/04</u> from <u>FAIRMONT WV</u>									
<small>The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own road or its own water line, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the conditions not prohibited by law, whether printed or written, herein contained (as specified in Appendix B to Part 1005) which are hereby agreed to by the shipper and accepted for himself and his assigns.</small>									
(Mail or street address of consignee for purposes of notification only.)					FROM:				
TO: Consignee <u>M'INTOSH EXPT. INC</u>					Shipper <u>REILY INDUSTRIES INC</u>				
Street <u>150 PARK RD</u>					Street _____				
Destination _____ Zip <u>15613</u>					Origin <u>FAIRMONT WV</u> Zip _____				
Route: _____									
Delivering Carrier: _____					Trailer (Inbal) Number _____		U.S. DOT Hazard Reg. Number _____		
No. of Packages	HM	Description of articles, special marks, and exceptions	Hazard Class	I.D. Number	Packing Group	Weight (subject to correction)	Class or rate	Labels required (see exceptions)	Check column
1	CM	CONSTRUCTION DEBRIS PLASTIC PIPE				10405			
Remit C.O.D. to: Address: _____ City: _____ State: _____ Zip: _____					COD AMT: \$ _____		<small>Subject to Section 7 of conditions, if the shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.</small>		
<small>If the shipment moves between carriers by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight". Note - where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____</small>					Charges Advanced \$ _____		C. O. D. FEE: Prepaid <input type="checkbox"/> Collect <input type="checkbox"/> \$ _____ FREIGHT CHARGES <input type="checkbox"/> Prepaid <input type="checkbox"/> Collect		
<small>This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to applicable regulations of the Department of Transportation.</small>					PLACARDS REQUIRED <input checked="" type="checkbox"/>		PLACARDS SUPPLIED <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO - FURNISHED BY CARRIER DRIVER'S SIGNATURE: _____		
SHIPPER: _____ PER: _____ DATE: _____					CARRIER: <u>MET</u> PER: _____ DATE: <u>4/29/04</u>				
Permanent post office address of shipper _____					EMERGENCY RESPONSE TELEPHONE NUMBER: () _____				
<small>Modified at all times the Hazardous Material is in transportation including storage incidental to transportation (§102.11)</small>									

9-BLS-A3 (Rev 7/95)