TRUSTEE NOTIFICATION FORM

Site: F. O'Connor
Break: 16.4.1
Other: _____

1. Site Identification

F O'Connor Site, Augusta, ME
CERCLIS NO MED 980731475

2. EPA Contacts

Technical:	Steven Serian	8-835-3647	617-565-3647
Legal:	Linda Ujifusa	8-835-3443	617-565-3443

3. Site Description and Relevant History

RAS

4. Response Category

- ☑ Federal Enforcement Lead
- ☐ State Enforcement Lead
- ☐ Unclassified
- ☐ Federal Fund Lead
- ☐ Federal Facility

5. Current Status of Site

- ☐ Proposed or Listed on NPL
- ☐ RI/FS Work Plan
- ☑ RI/FS
- ☐ Record of Decision
- ☐ RD/RA

6. Actual or Anticipated Date of ROD: JANUARY 1989

7. List Operable Units

N/A

8. On-Going or Planned Negotiations

The Remedial Investigation is separated into three sampling events called Tours. The PRP's submitted the results from Tour I in March, 1987, and will begin Tour II after EPA and ME DEP negotiate the next sampling event with the PRP's.

9. Request for a Covenant Not to Sue for Natural Resource Damages

N/A

10. Schedule for Coordination of Planned or On-Going Investigations

RAS

RAS - refer to attached sheet
N/A - not applicable

GUIDE TO TRUSTEE SELECTION

How does a Project Manager identify which natural resource trustees to coordinate with on a site? Below is a simple exercise to help the Project Manager. For each of the choices below, place a check if contamination at your site has damaged, or has the potential for damaging the habitat or biota described:

DOI Natural Resource Trustee

Fish and Wildlife Service
- ☑ wetlands, streams, rivers or ponds
- ☑ wildlife including fish, invertebrates, birds and mammals
- ☐ terrestrial or inland endangered species
- ☐ national wildlife refuge lands

National Park Service
- ☐ national park lands and historic sites

Bureau of Indian Affairs
- ☐ Indian tribal lands

DOC Natural Resource Trustee

- ☐ coastal environments including saltmarshes, tide flats, estuaries or other tidal wetlands
- ☑ rivers or tributaries to rivers which historically or presently support anadromous fish (see Note 1)
- ☐ marine mammals
- ☐ endangered marine species
- ☐ designated Estaurine Research Reserves or Marine Sanctuaries (see Note 2)

DOA Natural Resource Trustee

- ☐ National Forest Lands

DOD Natural Resource Trustee

- ☐ Navy, Army, Air Force or Defense Logistics Agency facilities

DOE Natural Resource Trustee

- ☐ DOE facilities

2.0 PROBLEM ASSESSMENT

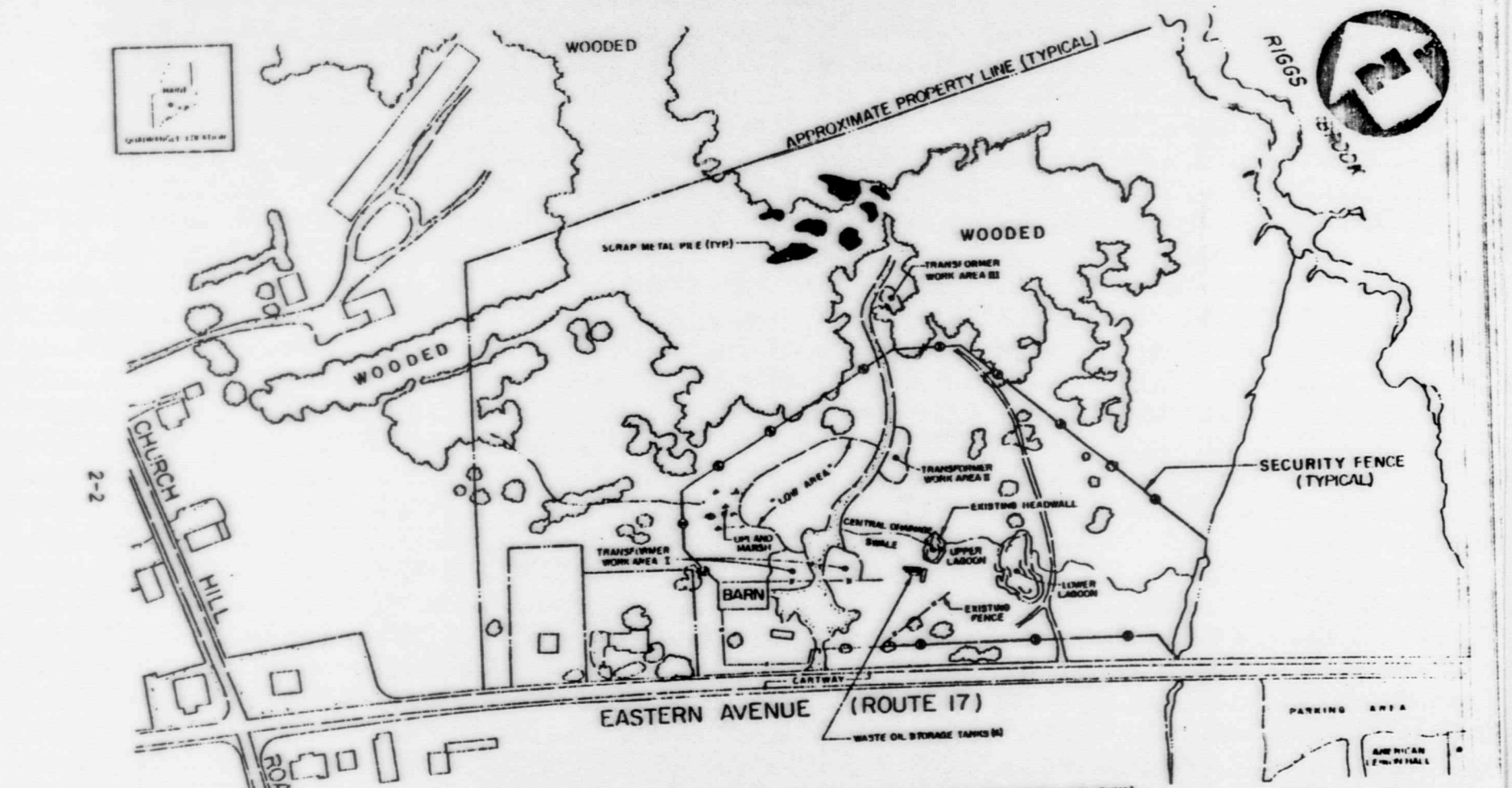
This section provides background to the O'Connor Site to facilitate an understanding of the problem. The site is identified geographically, site features are noted, activities which gave rise to the present situation are described, and the general environmental setting is characterized. The information provided in this section represents the basis upon which data needs are defined for the Remedial Investigation (RI). The information contained in this section has been developed from published data and a site reconnaissance undertaken by personnel from the NUS Remedial Planning Office (REMPO) on March 13, 1985. Much of the information has been excerpted from a Remedial Action Master Plan (RAMP) prepared by the REMPO in 1983 (NUS Corporation, September 1983).

2.1 Site Description

The O'Connor Site is located in Kennebec County, Maine, within the corporate limits of Augusta, the state capital, and approximately one mile southeast of Augusta, proper. Approximate coordinates of the center of the site are 44° 18' 10" North Latitude and 69° 44' 20" West Longitude.

The focus of concern for the purpose of this Work Plan lies within a tract of approximately 17 acres owned by the F. O'Connor Company. The property is bounded to the southwest by Eastern Avenue (Route 17), to the south and east by Riggs Brook, and by adjacent properties to the north and west. Figure 2-1 serves as a general site plan.

This property was the site of a former transformer-recycling operation and salvage yard. The activities related to disassembly of the transformers and salvage of components, including the transformer oils, represent the primary concern relative to hazardous wastes. One of the components of the transformer oils was found to be polychlorinated biphenyls (PCBs), which are considered hazardous substances. Transformer recycling and metal salvage activities appear to have been restricted to the central portion of the O'Connor Site, representing only about eight to ten acres of the 17-acre tract. Figure 2-2 has been excerpted from a low level aerial



BASE MAP TAKEN FROM MAY 18, 1984 AERIAL PHOTOGRAPHY (EPA ENVIRONMENTAL PHOTOGRAPHIC INTERPRETATION CENTER), AND IS SUBJECT TO PARALLAX DISTORTION

FIGURE 2-1

SITE PLAN
O'CONNOR SITE, AUGUSTA, ME
APPROX SCALE: 1" = 200'

NUS CORPORATION
A Halliburton Company

2-2

photograph of the site taken by the EPA Environmental Photographic Interpretation Center (EPIC) in May 1984. Both Figures 2-1 and 2-2 identify site features which are described in the remainder of this section.

The central portion of the property is transected from southwest to northeast by a dry-weather access road which extends for a distance of approximately 700 feet from the site entrance on Eastern Avenue. A gravelled parking area is located at the site entry. Within this area are a 20,000-gallon storage tank, a used fuel tank, and a two-story barn with approximately 2,800 square feet (40'x70') of floor space on the first floor. Both tanks are allegedly empty and according to the site owner none of these three features was ever used in support of the transformer recycling or metal salvage operations. A chain-link fence, installed by the F. O'Conner Company during the spring of 1985 under a CERCLA 106 Order issued by EPA, pronibits unauthorized access to the site.

A wooden fence, approximately 8 feet high, originates at the southeastern corner of the barn and extends to the southeast for a distance of approximately 200 feet, screening the site from public view from Eastern Avenue. Transformer-recycling and metal salvage activities appear to have occurred primarily to the east of this fence along the access road.

Immediately to the east of the fence is an area noted on the site plan as Transformer Work Area I. This area lies on both sides of the access road and occupies an area of approximately 5,500 square feet (0.1 acre).

Approximately 100 feet east of Transformer Work Area I is a similar area which has been noted on the site plan as Transformer Work Area II. The latter extends for a distance of approximately 70 feet along the southern berm of the access road and is about 2,500 square feet in area.

Both of the above areas are devoid of vegetation. Surface soils are visibly darker than those in the surrounding area, and remnants of transformer components (fragments of ceramic insulators, small electrical components, etc.) litter the surface.

A natural drainage swale originates on the O'Connor property about 500 feet upslope (north) of the access road. The swale proceeds in a southerly direction, past the access road and transformer work areas, and ultimately discharges to a lowland adjacent to Riggs Brook, approximately 500 feet south of its intersection with the access road. Immediately north of the access road the swale has been backfilled, obstructing the natural drainage pattern, and resulting in the creation of a cattail (Typha sp.) marsh. The marsh has a surface area of approximately 3,000 square feet. The backfilled area has been designated the "low area" on the site plan (Figure 2-1).

Approximately 150 feet south of the access road the swale has been obstructed by a concrete wingwall, creating a shallow lagoon with a surface area of about 1,200 square feet. A second lagoon has been created approximately 120 feet further downstream. The latter lagoon has a surface area of about 3,600 square feet. These lagoons have been respectively designated "Upper Lagoon" and "Lower Lagoon" on the site plan.

Approximately 150 feet northeast of Transformer Work Area II along the access road is a third area which is sparsely-vegetated and characterized by the presence of ceramic insulator fragments. Although this area may not have been as intensively used for transformer recycling as the former two, it has been designated Transformer Work Area III for the purpose of further investigation.

Beyond the northeastern terminus of the access road is a wooded area of approximately 1.4 acres which was used in the past for dumping of miscellaneous metal scrap such as automotive parts, electrical meter boxes, and household appliances. Interspersed among the scrap piles are ten tanks which were allegedly salvaged fuel tanks purchased by O'Connor for resale as septic tanks. This practice was discontinued and the tanks were left onsite. A similar tank may be found at the periphery of a wooded area approximately 100 feet north of Transformer Work Area II. The approximate locations of the individual scrap piles are shown in Figure 2-1

Beyond the area of metal scrap disposal to the north is an old field area of approximately 2 acres. No disturbance associated with the site operations noted above appears to have occurred in this area. Similarly, a wooded area to the southeast and open lowlands along Riggs Brook in the southern portion of the O'Connor tract do not appear to have been affected by surface disturbances associated with the transformer-recycling and metal salvage operations. The latter, however, may have been indirectly affected by discharge from the site.

2.2 History of Site Operations and Remedial Actions to Date

This section briefly discusses the activities at the O'Connor Site which have given rise to the present situation. A much more detailed chronology of site events through May 1983 may be found in the RAMP for this site (NUS Corporation, September 1983). Discussions of site operations below will focus on the transformer-recycling activities. This appears to have been the primary hazardous waste-related activity at the site, and also appears to have comprised the bulk of O'Connor's business.

Transformer recycling and metal salvage operations began at this site in the 1950's. Transformers were dismantled and usable parts salvaged. Transformer oil was either collected in drums for reuse, or discharged to the soil. Some of the oils which were collected may have been spilled to the ground surface. It is assumed that these activities took place for the most part at Transformer Work Areas I and II. The natural drainage swale mentioned above would have collected surface drainage from the work areas, and would also have served as a depositional area for soils eroded from the work areas.

Some attempts may have been made during the early stages of activity to collect surface spills in an onsite basin. However, inspection of the site by the Maine Department of Environmental Protection (DEP) in 1972 revealed that an oil spill had migrated from the site to Riggs Brook. A transformer oil storage tank was placed onsite to alleviate the problem of direct discharge from the transformer

work areas. However, waste oil contamination continued to be a problem and in 1976 O'Connor constructed the upper and lower lagoons on the drainage swale to trap oils carried in surface water before their entry into Riggs Brook.

Waste oil began to accumulate on the surface of the upper lagoon, and in 1976 the Maine DEP instructed O'Connor to collect the waste oil and place it in storage tanks onsite pending disposal. Six storage tanks were located adjacent to the upper lagoon and are presently storing oil skimmed from the surface of the lagoon. A recent estimate of the quantity of liquids in these tanks was reported to be 6,000 to 9,000 gallons (Acheron Engineering Services and J. K. Richard Associates, March 29, 1985). The finding of PCB's in the oil in 1977 has complicated efforts to dispose of the material and, as a result, the oil remains in the tanks pending further investigation.

In 1977 O'Connor was instructed that in order for transformer recycling operations to continue at the site it would be necessary to construct a containment area in which all oil recovery work would take place. O'Connor was instructed to discontinue use of the lagoons, dewater the lagoons into holding tanks, excavate and dispose of the lagoon sediments, and reclaim the lagoon areas. This work was initiated in 1977 with the dewatering of the upper lagoon into the storage tanks noted above, and the partial dewatering of the lower lagoon. Sediments from the upper lagoon were removed and deposited in an area within the natural drainage swale north of the access road. This area has been referred to as the "low area" on the site plan and in previous discussion. According to Mr. Jack O'Connor in discussions during the March 13 site reconnaissance, the low area was prepared to receive the sediments by placement of a lining of one foot of marine clay. Following placement of the sediments the entire area was allegedly capped with another 1-foot layer of marine clay. This obstruction of the swale created a backwater immediately upslope, resulting in inundation of the low area during heavy rainfall. In an attempt to correct the problem the Maine DEP recommended additional cover over the low area and installation of a shallow drain system to dewater the area. The drainage system was installed in 1978, and while a marsh

still exists, at least a portion of the water from the marsh is being conveyed around the low area via a length of 8-inch (I.D.) cast iron pipe. This pipe has been buried within the swale and outlets into the upper lagoon.

The lagoons were not backfilled as originally suggested by the DEP. Rather, in 1979 the DEP instructed O'Connor to leave the lagoons in place to serve as catchment basins for surface water runoff and possible spillage or leakage from the storage tanks adjacent to the upper lagoon. Further remedial action to resolve the initial problem of uncontrolled oil migration to Riggs Brook was not initiated beyond this point by the DEP.

In 1982 Ecology & Environment Incorporated (E&E), acting under contract to the EPA as the Region I Field Investigation Team (FIT), conducted a preliminary assessment (PA) of the site and the Maine DEP resampled the upper and lower lagoon areas and the Riggs Brook lowland. E&E/FIT again sampled the site in 1982 and NUS Corporation, which had assumed the FIT contract, conducted a sampling program in 1983. As a result of these sampling efforts, the EPA Emergency Response Team (ERT) conducted sampling in July 1984 to determine whether an imminent danger existed at the site which would require immediate removal action. The results of the various sampling exercises are reported in Section 2.4, Sources of Contamination.

In December 1984 the EPA issued a CERCLA 106 order to the F. O'Connor Company to undertake actions to secure the site from unauthorized access and to develop and implement sampling programs to define the contents of the drums and tanks onsite. J. K. Richard Associates and Acheron Engineering Services were retained by the F. O'Connor Company to provide engineering assistance in complying with the order. In compliance with the order, O'Connor has erected a security fence. The location of the fence has been shown on Figure 2-1. A shallow soil sampling program was conducted in May and July 1985, with results reported in January 1986. Samples collected from tanks on site in November have not yet been submitted for analysis.

TABLE 3-1

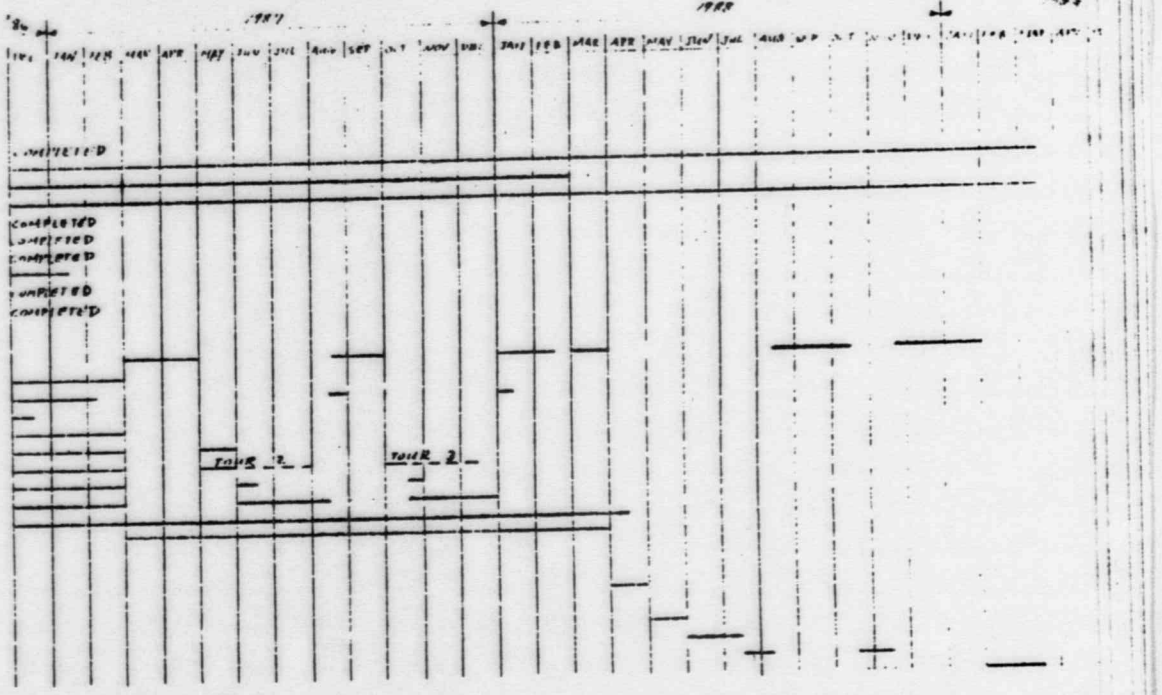
PROJECT TASK OUTLINE
F. O'CONNOR SITE
AUGUSTA, MAINE

PHASE I - INITIAL ACTIVITIES

TASK 1 - DATA COLLECTION/EVALUATION
TASK 2 - PROJECT MANAGEMENT
TASK 3 - OBJECTIVES/ALTERNATIVES DEVELOPMENT
TASK 4 - COMMUNITY RELATIONS SUPPORT
TASK 5 - SUBCONTRACTOR PROCUREMENT
TASK 6 - PERMITS, RIGHTS OF-ENTRY, AND OTHER AUTHORIZATIONS
TASK 7 - DETAILED SITE RECONNAISSANCE
TASK 8 - TOPOGRAPHIC MAPPING
TASK 9 - PROJECT OPERATIONS PLAN
TASK 10 - FIELD EQUIPMENT MOBILIZATION

PHASE II - RI SITE INVESTIGATION
EPA REVIEWS
TASK 11 - DOMESTIC WELL SURVEY
TASK 12 - ENVIRONMENTAL ASSESSMENT
TASK 13 - REMOTE SENSING INVESTIGATION
TASK 14 - MONITORING WELLS
TASK 15 - HYDROLOGIC STUDIES
TASK 16 - ENVIRONMENTAL SAMPLING & ANALYSIS
TASK 17 - GROUND SURVEY
TASK 18 - DATA REDUCTION, VALIDATION, AND EVALUATION
TASK 19 - RI REPORT
EPA ASSESSMENT
PHASE III - FEASIBILITY STUDY

TASK 20 - DEVELOPMENT OF ACTION LIMITS AND FINALIZATION OF RESPONSE OBJECTIVES
TASK 21 - DEVELOPMENT OF REMEDIAL ALTERNATIVES
TASK 22 - DETAILED EVALUATION OF REMEDIAL ALTERNATIVES
TASK 23 - DRAFT FS REPORT
TASK 24 - FINAL FS REPORT



NOTE:
Schedule is based on the assumption that Tour 3 is required. If Tour 3 is eliminated, schedule reduces by 18 weeks.