

FEDERAL ON-SCENE COORDINATOR'S REPORT
FOR THE
BELFIELD AVENUE SITE
5238 BELFIELD AVENUE, PHILADELPHIA PENNSYLVANIA
CERCLA REMOVAL ACTION
July 14, 1987 through October 11, 1989



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III, PHILADELPHIA, PENNSYLVANIA

100011

Belfield Avenue Site
Federal On-Scene Coordinator's Report

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REGION III
CERCLA EMERGENCY RESPONSE/REMOVAL ACTION

Project #182
FACTS SHEET

SITE: Belfield Avenue Site

SIZE: A large 3-story building of approximately 120,000 square feet

LOCATION: 5238 Belfield Avenue, Philadelphia, Pennsylvania

PROJECT DATES: July 14, 1987 through October 11, 1989

DESCRIPTION: The Belfield Avenue Site began as an emergency response to an explosion/fire in a former chemical repackaging and specialty chemical blending company. Philadelphia Fire Department requested EPA assistance upon the discovery of hazardous materials in the building. Delegation of Authority 14-1-A was utilized to implement mitigative measures until a determination could be made as to the ability of potential responsible parties to take over the removal action.

HAZARDOUS MATERIAL: See as listed in Quantities Removed

QUANTITIES REMOVED: Six 20-cubic foot rollofs contaminated debris to Waste Conversion, Hatfield, PA; approximately 10,000 gallons contaminated decontamination water to Chem-Clear, Chester, PA; one 20-cubic foot rolloff crushed drums to GSX, Pinewood, SC; 98 drums PCBs, acid liquids, oxidizer liquids, flammable solids, organic solids, base neutrals, cyanide solids, peroxide liquids, 25 drums hazardous waste solids, one drum mercury-based pesticides to ENSCO, El Dorado, AK; 3 truckloads drums of base neutral liquids, cyanide liquids, flammable organic liquids and organic liquids to Caldwell Systems, Lenoir, SC; 7 drums corrosive liquids to Chem Waste Management, Newark, NJ; one drum flammable liquid to Frontier Chemical Waste Process, Niagara Falls, NY.

OSC: Garrett H. Arai, Philip C. Younis

REMOVAL CONTRACTOR: O.H. Materials, Inc., Findlay, OH

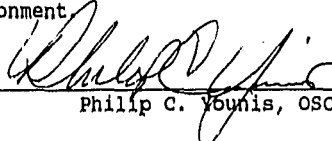
DISPOSAL LOCATION: See as listed in Quantities Removed

PROJECT CEILING: \$1,326,000

PROJECT COST: \$1,107,192 (Estimated)

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COMMENTS: Because the identified potential responsible party, Visual Packaging, was unable to perform the entire removal, EPA addressed the situation and eliminated the threat to human health and the environment.

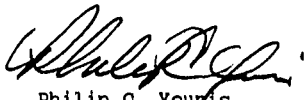

Philip C. Younis, OSC

Belfield Avenue Site
Federal On-Scene Coordinator's Report

FOREWORD

This report is submitted in accordance with procedures outlined in the National Oil and Hazardous Substances Contingency Plan (NCP). The primary thrust of the plan is to provide a coordinated Federal response capability at the scene of an unplanned or sudden discharge of oil or hazardous substance that poses a threat to the public health or welfare. In addition, the provisions of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), promote a coordinated Federal, State and local response to mitigate situations at hazardous waste sites which pose a potential threat to public health. The Belfield Avenue Site presented an imminent hazard to public health thereby providing a legal basis for Federal response activities. The provisions of the NCP were implemented by the U.S. Environmental Protection Agency, Region III, Philadelphia, Pennsylvania.

Special thanks are extended to the agencies and groups who participated in this Federal Removal Activity. A prompt evaluation of the situation enabled a timely and efficient mitigation of the threat to human health and the environment.



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

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Belfield Avenue Site
Federal On-Scene Coordinator's Report

I. INTRODUCTION

A. Nature of the Site/Initial Situation

At the time of this incident, the Visual Packaging Company, formerly a chemical repackaging and specialty chemical blender company, was located at 5238 Belfield Avenue in the Germantown section of Philadelphia, PA. The facility consisted of a large, three-story building of approximately 120,000 square feet. The building housed Visual Packaging and several small businesses which rented space. The small businesses were involved in the manufacturing of rugs, furniture, and other wood products. The products packaged and blended at Visual Packaging included hand soap, gasfinder, waterfinder, zinc oxide products, methanol blends, brake fluid, and isopropyl alcohol. Raw materials for the blending were stored in six (6) 1000-gallon tanks located in the Visual Packaging work area and in one (1) 7000-gallon underground tank.

On July 14, 1987, the Visual Packaging Company building was damaged by explosions followed by fire. The cause of the blast was investigated by the City of Philadelphia Fire Marshall's Office, and subsequently determined to be a case of arson. Effects of the blasts on the building included shattered glass, blown out brick and concrete walls, collapsed roof, and general fire damage to portions of the interior. At the request of the Philadelphia Fire Department (PFD) due to the presence of hazardous materials, EPA, accompanied by members of the Roy F. Weston Technical Assistance Team (TAT), responded to the emergency to assist PFD officials.

On July 24, 1987, the potential responsible party (PRP) signed a CERCLA consent order provided by EPA Enforcement Stauteville. OSC Arai utilized the Delegation of Authority 14-1-A on August 20, 1987 to obtain \$50,000 emergency funding to activate ERCS and begin removal actions; the PRP could not initiate cleanup activities as outlined in the consent order.

B. Site Location

The Belfield Avenue Site was located at 5238 Belfield Avenue in the Germantown section of Philadelphia, Pennsylvania. The building consisted of three (3) stories and covered approximately 120,000 square feet. The area surrounding the site was residential in nature, with the Philadelphia Gas Works office located beside the building and a gas station/automobile dealership located across the street from the facility. A SEPTA train station was located approximately 20 feet behind the facility and the entrance to the platform lay along one side of the building.

Belfield Avenue Site
Federal On-Scene Coordinator's Report
INTRODUCTION (continued)

C. Efforts to Obtain Response from Potential Responsible Parties

During the course of the removal action, EPA CERCLA Removal Enforcement Section (CRES) representative Bill Steuteville and OSC Garrett Arai contacted the small businesses that operated out of the building. Each were requested to remove their products and/or waste, but none was able to assist. However, Methods Research was able to arrange for the removal of their glue products which were recycled, and Mr. Vernon of Visual Packaging Company removed several drums of product and approximately 1300 gallons of flammable liquid for recycling.

Belfield Avenue Site
Federal On-Scene Coordinator's Report

II. ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS

A. Names and Addresses

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF DUTIES
U.S. EPA - Region III Eastern Response & Preparedness Section 841 Chestnut Building Philadelphia, PA 19107 (215) 597-9800	Garrett H. Arai Philip C. Younis	Federal On-Scene Coordinators; responsible for overall success of the project.
U.S. EPA - Region III Office of Public Affairs 841 Chestnut Building Philadelphia, PA 19107 (215) 597-9800	Ann Cardinal Nanci Sinclair	Provided OSC with assistance regarding media and citizen concerns.
U.S. EPA - Region III CERCLA Removal Enforcement Section 841 Chestnut Building Philadelphia, PA 19107 (215) 598-9800	William Steuteville	Assisted OSC with PRP issues.
U.S. Department of Labor Occupational Health & Safety Administration (OSHA) U.S. Customs House, Room 242 Philadelphia, PA 19107 (215) 597-4955	John Barry James Woodburn	Assisted OSC with site safety issues.
Pennsylvania Department of Environmental Resources Bureau of Waste Management 1875 New Hope Street Norristown, PA 19401 (215) 565-1687	Robert Allen	Assisted OSC with site hazard evaluation.

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Belfield Avenue Site
Federal On-Scene Coordinator's Report
ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS (continued)

A. Names and Addresses (continued)

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF DUTIES
City of Philadelphia Bureau of Licensing & Inspections 1101 Market Street, Suite 600 Philadelphia, PA 19107 (215) 592-6073	Robert F. Hoyt	Served notice to PRP of numerous building violations.
City of Philadelphia Fire Marshall's Office 3rd and Springgarden Streets Philadelphia, PA 19123 (215) 592-5962	Earl Sheldon	Performed fire hazard evaluation of the buillidngs.
City of Philadelphia Hazardous Materials Administrative Unit 3rd and Springgarden Streets Philadelphia, PA 19123 (215) 574-1140	Captain Joseph McAleer	Assisted OSC with hazardous materials evaluation.
City of Philadelphia Office of Managing Directors 1620 Municipal Services Building Philadelphia, PA 19107 (215) 686-7114	John Hadalski	Assisted OSC with site logistics.
City of Philadelphia Water Department 1 Reading Center, Third Floor 11th and Market Streets Philadelphia, PA 19107 (215) 592-6235	Joseph Morrow	Assisted OSC with waste water disposal.

Belfield Avenue Site
Federal On-Scene Coordinator's Report
ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS (continued)

A. Names and Addresses (continued)

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF DUTIES
Roy F. WESTON, Inc. Technical Assistance Team (TAT) 53 Haddonfield Road, Suite 306 Cherry Hill, NJ 08002 (609) 482-0222	Kathleen Barry Kevin Scott Stephanie Morris Todd Chochoiaty John Disciullo	Provided technical assistance during emergency response and removal action including photographic and site activities, contractor and cost monitoring and site safety.
O.H. Materials, Inc. P.O. Box 551 Findlay, OH 45839-0551 (419) 423-3526	Gary Roseman and Jeff Bodi, Response Managers	ERCS prime contractor; provided manpower and equipment, coordinated subcontractors.
Duall, Inc. 34 North Pine Avenue Maple Shade, NJ 08052 (609) 665-3116	Thomas Bartels, Supervisor	Asbestos removal subcontractor.
Cleveland Wrecking Company 702 Chester Pike Sharon Hill, PA 19079 (215) 729-2700	Steve Schwartz, Supervisor	Demolition subcontractor.
Galson Research Corporation 6601 Kirkville Road East Syracuse, NY 13057 (315) 463-5610	Roger Gall, Supervisor	Subcontractor for PCP on-site treatment process.
Special Hazards Management Company P.O. Box 6917 Arlington, VA 22206-0917		Handled zinc dust found on site.
Southeastern Pennsylvania Transportation Authority 841 Chestnut Building Philadelphia, PA 19107 (215) 456-4633	Mr. LaGuardia Mr. McMenamer	Inspected the structural integrity of the south wall of the building which was believed to partially support the SEPTA passenger platform.

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Belfield Avenue Site
Federal On-Scene Coordinator's Report
ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS (continued)

A. Names and Addresses (continued)

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF DUTIES
Visual Packaging Company Ragues Mill Road Ambler, PA 19002 (215) 646-4714	Robert Vernon John Vernon, Plant Manager	Property and business owner; potential responsible party.
Hecker, Rainer and Brown 717 Two Penn Center Plaza 15th Street and JFK Boulevard Philadelphia, PA 19102 (215) 665-0400	Geoffrey Veith	Attorney for PRP.
Delaware Container Company, Inc. W. 11th Avenue & Valley Road Coatesville, PA 19320 (215) 383-6600	Ed Williams	Transporter and final disposal facility for flammable liquids
ENSCO, Inc. American Oil Road El Dorado, AK 71730-1957 (501) 863-7173	T. Ellis	Final disposal facility for hazardous liquids, flammable liquids, corrosives, hazardous solids.
CSX Services of SC, Inc. Route 1, Box 255 Pinewood, SC 29125 (803) 452-5003	Ann Wilson	Final disposal facility for RCRA/ TSCA DOT regulated solids.
Frontier Chemical Waste Process, Inc. 24626 Royal Avenue Niagara Falls, NY 14303 (716) 285-8208		Final disposal facility for waste flammable liquids.

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Belfield Avenue Site
Federal On-Scene Coordinator's Report
ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS (continued)

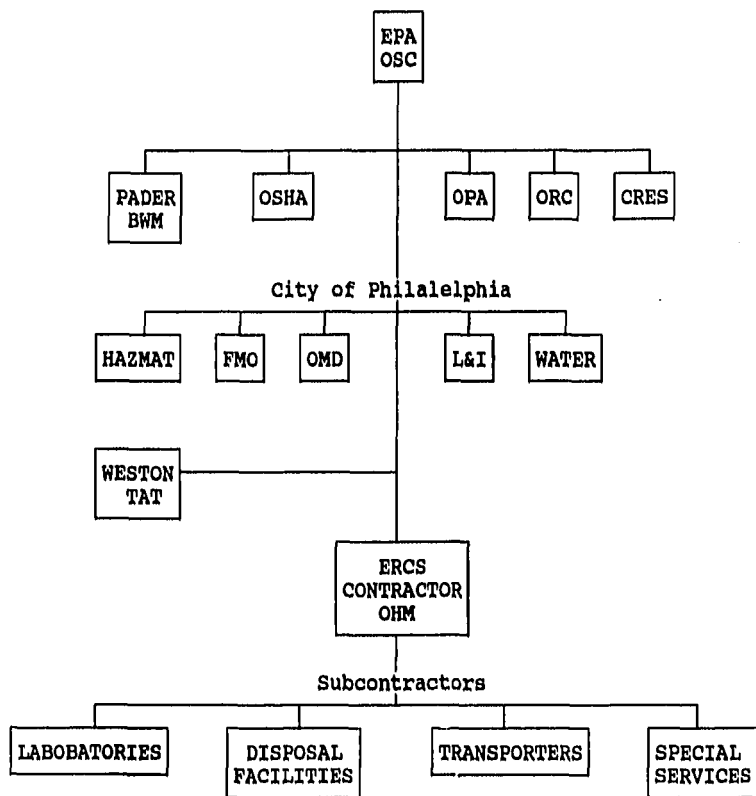
A. Names and Addresses (continued)

NAMES AND ADDRESSES	CONTACT	BRIEF DESCRIPTION OF DUTIES
Chemical Waste Management of New Jersey, Inc. 100 Lister Avenue Newark, NJ 07105 (201) 465-9100	Ivy Oversy	Final disposal facility for waste corrosive solid.
Freehold Cartage, Inc. P.O. Box 4629 Freehold, NJ 07728 (201) 462-1001	William Breese Dave Florer	Transporter for hazardous liquids, non RCRA/TSCA DOT regulated solids, waste flammable liquids, corrosives, and hazardous waste solids.

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Belfield Avenue Site
Federal On-Scene Coordinator's Report
ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS (continued)

B. Organization of the Response



Belfield Avenue Site
Federal On-Scene Coordinator's Report
ROSTER OF AGENCIES, ORGANIZATIONS AND INDIVIDUALS (continued)

C. Glossary of Abbreviations

ATSDR	Agency for Toxic Substances and Disease Registry
BWM	PADER Bureau of Waste Management
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CRES	CERCLA Removal Enforcement Section
DPO	Deputy Project Officer
EPA	U.S. Environmental Protection Agency
ERCS	Emergency Response Cleanup Services
ERD	EPA Emergency Response Division
ERS	EPA Emergency Response Section
ERT	EPA Environmental Response Team
FMO	City of Philadelphia, Fire Marshall's Office
FW	F.W. Winter, Inc.
HAZMAT	City of Philadelphia, Hazardous Materials Administrative Unit
HNU	Photoionization detector manufactured by HNU
HQ	EPA Headquarters, Washington, DC
LEL	Lower Explosive Level
L&I	Philadelphia Department of Licensing and Inspections
MEK	Methyl ethyl ketone
MSDS	Material Safety Data Sheet
NCP	National Oil and Hazardous Substances Contingency Plan
OHM	O.H. Materials, Inc.
OMD	City of Philadelphia, Office of Managing Directors
OPA	EPA Office of Public Affairs
ORC	EPA Office of Regional Counsel
OSC	EPA On-Scene Coordinator
OSHA	Occupational Safety and Health Administration
OVA	Organic vapor analyzer
PADER	Pennsylvania Department of Environmental Resources
PCB	Polychlorinated biphenyl
PCP	Pentachlorophenyl
PFD	Philadelphia Fire Department
PPB	Parts per billion
PPM	Parts per million
PRP	Potential Responsible Party
RAM	Real-Time air monitor
RCMS	Removal Cost Management System
RCRA	Resource Conservation and Recovery Act
RM	ERCS Response Manager
RP	Responsible party
RSO	Regional Safety Officer
SARA	Superfund Amendments and Reauthorization Act of 1986
SHMC	Special Hazards Management Company
TAT	Roy F. Weston, Inc., Technical Assistance Team
TATL	Technical Assistance Team Leader
UST	Underground storage tank
WATER	City of Philadelphia Water Department

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Belfield Avenue Site
Federal On-Scene Coordinator's Report

III. NARRATIVE OF EVENTS

On July 14, 1987, at 1015 hours, OSC Garrett Arai and members of the Roy F. Weston Technical Assistance Team (TAT) responded to a fire and explosion at the Visual Packaging Company located at 5238 Belfield Avenue in the Germantown section of Philadelphia, PA. The owner and operator of the Visual Packaging Company, Mr. Robert Vernon, stated to the OSC that the following products were produced in the plant: Hand soap, gasfinder, waterfinder, zinc oxide products, methanol blends, brake fluid, and isopropyl alcohol. He also stated that six 1000-gallon tanks, two of which were full of methanol, were present in the plant. A number of drums were located on the roof of the building with unknown contents. No entry was made into the building on this date due to unsafe conditions as advised by the Philadelphia Fire Marshall.

At 0953 hours on July 15, 1987, TAT members Kevin Scott, Jack Williams, and Todd Chocholaty performed a site assessment with OSC Arai and the Philadelphia Fire Department (PFD). Numerous tanks were found in the building containing various fuel products (ie: isopropanol, toluene). There were also many drums, some damaged, some oils and unknowns.

OSC Arai and Bill Steuteville, CERCLA Removal Enforcement Section (CRES) met with Mr. Vernon to discuss the raw materials that remained in the building and the drums of unknowns on the roof. Mr. Vernon stated that he would take no responsibility for the drums of unknowns that had been left on the roof by a previous tenant and that his business and property were in bankruptcy. He would, however, take responsibility for cleaning up what remained of his products and raw materials.

On July 23, 1987, a meeting was held by CRES to evaluate the clean-up plan submitted by Mr. Vernon. OSHA determined that Mr. Vernon could begin his work plan after portions of the building were stabilized and work areas defined. Mr. Vernon signed the CRES consent agreement this date.

However, the PRP was not able to initiate a cleanup in a timely fashion. Therefore, on August 20, 1987, OSC Arai activated Superfund for \$50,000 under Delegation of Authority, 14-1-A (5/1/85) to begin an EPA removal action. By August 24, 1987, the prime contractor under the Emergency Response Contract Services (ERCS) mechanism had mobilized to the scene to begin cleanup activities.

A section of the roof had collapsed on a majority of the drums and containers. This debris, along with the shoring of some of the walls, was addressed by ERCS first. After the building was safe as approved by a structural engineer, an asbestos removal contractor was hired by ERCS to remove pipe insulation. Upon removal

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Belfield Avenue Site
Federal On-Scene Coordinator's Report
NARRATIVE OF EVENTS (continued)

of the asbestos, a demolition contractor was hired to remove debris caused by the collapsed roof. Air monitoring was performed by TAT throughout demolition activities that indicated very low dust levels. Drums and containers were moved and staged as they were uncovered in preparation for sampling.

EPA Enforcement personnel contacted the PRP throughout the project. At various times usable products, such as glue, were transported off site for reuse in industry.

A ceramic shop and wood shop were located in this building. Due to this fact, numerous dyes, glazes, and varnishes remained on site after the fire and explosion. A component found in these materials is pentachlorophenol (PCP) which is an insecticide and wood preservative. At the time of disposal during this project, there were no permitted facilities for PCP. ERCS was directed by the OSC to obtain a subcontractor to perform an on-site dechlorination process to break down the PCP in the waste. On August 17, 1988, Galson Research of Syracuse, NY was the firm hired for the on-site treatment of the PCP contaminated waste.

During the on-site treatment set up and preparation, drums and containers on the other side of the building were staged and sampled by ERCS and TAT. These were to be addressed and taken care of initially by the PRP, but no action was taken. As a result, the OSC incorporated them into the EPA cleanup.

On November 20, 1988, OSC Philip Younis and the ERCS Program Manager decided not to proceed with the Galson Research on-site treatment process because results of the lab scale testing indicated the contaminated materials were non-hazardous. The process was discontinued and the PCP-contaminated waste was secured in a fire-resistant vault on site until a disposal option became available.

Various city agencies, including the Managing Director's Office, Philadelphia Haz-Mat Team, Philadelphia Fire Department and Department of Licensing and Inspections, were kept updated on site activities and made visits to the site. A contingency plan was written by the Philadelphia Haz-Mat Administration in conjunction with the fire companies that would be the first responders, if there were an emergency at the site.

By October 11, 1989, the last of the remaining overpacked drums and containers had been transported off site for disposal (see Section V, C for breakdown). The PCP-contaminated waste remained on site secured in a fire-resistant cement vault. A Final POLREP was issued and the project was declared closed by OSC Younis. At the time of this writing, EPA Remedial investigations are underway to assess the potential for future activity at the site.

Belfield Avenue Site
Federal On-Scene Coordinator's Report

IV. RESOURCES COMMITTED

A. Initial Funding Request

After assessing the situation and confirming the threat to human health and the environment, OSC Arai utilized the Delegation of Authority 14-1-A (5/1/85) to obligate \$50,000 to mobilize ERCS and commence removal of asbestos in the building and removal of the collapsed roof on August 20, 1987. Special Bulletin A is presented in Appendix B of this report.

B. Funding Increases

By September 1, 1988, an additional funding request to increase the total project ceiling to \$1,326,000 was approved by the Regional Administrator. These funds were sufficient for sampling and analysis of all containers on site and also disposal of the waste streams. A copy of the funding increase is presented in Appendix B of this report.

C. Estimated Total Project Cost

1. Extramural

a. ERCS	\$1,002,026
b. TAT	33,077
Extramural Subtotal	\$1,034,103

2. Intramural

a. EPA Direct Costs	\$ 18,279
b. EPA Indirect Costs	54,810
Intramural Subtotal	\$ 73,089
ESTIMATED TOTAL PROJECT COST	\$1,107,192

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Belfield Avenue Site
Federal On-Scene Coordinator's Report

V. EFFECTIVENESS OF THE REMOVAL

A. Activities of Various Agencies

1. Potential Responsible Parties

The potential responsible parties (PRPs) associated with this site did not secure or remove any hazardous waste for disposal. However, as mentioned in the Introduction, Section I.C., these PRPs or their representatives removed materials and products that were still usable within industry at the request of OSCs Arai and Younis to assist with the removal action.

2. Federal Agencies and Special Forces

Garrett H. Arai of EPA Region III, Philadelphia, Pennsylvania, initially served as the Federal On-Scene Coordinator (OSC). After OSC Arai departed the Agency, OSC Philip C. Younis became the OSC of record. It is the OSC's responsibility to coordinate all efforts to the successful completion of a removal project.

William Steuteville of Region III CERCLA Removal Enforcement Section (CRES) was responsible for the identification of PRPs associated with this site. Contacting PRPs and obtaining the consent order was also performed by CRES Steuteville.

The Region III Office of Public Affairs (OPA) provided personnel to support the OSC with media and local resident concerns.

3. State and Local Forces

The Pennsylvania Department of Environmental Resources (PA DER) assisted the OSC with the initial hazard assessment of the site and were periodically updated of site progress by the OSC.

The City of Philadelphia provided support from many agencies to assist the OSC in areas of site and fire hazard evaluation, site logistics and contingency plans. The specific agencies are presented in the Roster of Agencies, Organizations and Individuals, Section II.A., of this report.

4. Contractors

Personnel from the Roy F. Weston, Inc., Spill Prevention and Emergency Response Division, Technical Assistance Team (TAT), provided the OSC with technical assistance, site safety monitoring, photographic and site activities documentation.

O.H. Materials, Inc. (OHM) of Findlay, Ohio, was the prime contractor under the Emergency Response Contract Services (ERCS) mechanism. It was OHM's responsibility to provide the manpower and equipment necessary to perform stabilization measures and final disposal of hazardous materials on site. OHM also coordinated the efforts of subcontractors Duall, Inc., Cleveland Wrecking Company and Galson Research Corporation.

Belfield Avenue Site
Federal On-Scene Coordinator's Report
EFFECTIVENESS OF THE REMOVAL (continued)

B. Analytical Synopsis

After the had been removed from the area and the drums and containers were uncovered from the debris of the collapsed roof, they were staged and sampled by ERCS. The samples were then sent to AnalytiKEM and Princeton Testing where they were analyzed for compatibility characteristics, PCP, PCB, and mercury. Analytical data revealed a mercury-based pesticide, flammable liquids, corrosive liquids and organic solids.

When the PRP took no action to dispose of the drums and containers in the Visual Packaging Company, these were also sampled by ERCS. Analytical results from QC Labs indicated the presence of flammable and corrosive liquids, and organic and inorganic solids.

Hard copies of analytical are maintained in the site file at the U.S. EPA, Region III, Philadelphia, PA office. Photocopies are available upon request by contacting Region III at the number given in Section III, Roster of Agencies, Organizations and Individuals.

C. Disposal Methods and Quantities Removed

- 1) Six 20 cubic foot rollofts of contaminated debris transported to Waste Conversion, Hatfield, PA, December 22, and 23, 1987.
- 2) Approximately 10,000 gallons of contaminated decontamination water was taken to Chem-Clear, Chester, PA, December 22, 1987.
- 3) One 20 cubic foot rolloff of crushed drums and contaminated protective clothing was transported to GSX of Pinewood, SC on June 9, 1989.
- 4) A shipment of 98 drums of PCBs, acid liquids, oxidizer liquids, flammable solids, organic solids, base neutrals, cyanide solids and peroxide liquids were taken to ENSCO in El Dorado, AK on June 1989 for incineration.
- 5) Three truckloads of drums containing base neutral liquids, cyanide liquids, flammable organic liquids and organic liquids were transported to Caldwell Systems in Lenoir, SC on June 10, 1987.
- 6) A shipment of 25 drums of hazardous waste solids and one drum of mercury-based pesticides were transported to ENSCO, El Dorado, AK on October 11, 1989.
- 7) Seven drums of corrosive liquid were transported to Chem Waste Management, Inc., Newark, NJ on October 11, 1989.
- 8) One drum of flammable liquid was taken to Frontier Chemical Waste Process, Inc., Niagara Falls, NY on October 11, 1989.

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SECTION VI
CHRONOLOGY OF EVENTS

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Belfield Avenue Site
Federal On-Scene Coordinator's Report

VI. CHRONOLOGY OF EVENTS

JULY 14, 1987

An explosion occurred at the Visual Packaging Company, Inc. at 5238 Belfield Avenue, Philadelphia, PA at approximately 0550 hours.

OSC Arai and TAT spoke with the owner/operator of Visual Packaging, Bob Vernon, who indicated that hand soap, gasfinder, waterfinder, zinc oxide products, methanol blends, brake fluid and isopropyl alcohol had been produced at the site. There were also six 1,000-gallon tanks, two of which were full. One contained methanol and the other contained isopropyl alcohol. In addition, there were some drums containing unknowns on the roof.

The Fire Marshall indicated that Visual Packaging did not have any state, local, city or federal permits or licenses.

Mr. Vernon stated that he probably was bankrupt and had no insurance. The company was a self-contract manufacturer.

JULY 15, 1987

The fire was stabilized and the Fire Marshall suspected arson. PFD, EPA and TAT made a site assessment and inventory. PRP Vernon established 24-hour security and verbally agreed to clean up the property and hazardous materials on the property, excluding drums on the roof abandoned by the former owner.

City of Philadelphia Department of Licensing and Inspection (L&I) performed an inspection to determine code violations.

City police blocked off the walkway to the SEPTA train station located adjacent to portions of the damaged building.

JULY 24, 1987

TAT made a level B entry to monitor the building with an explosimeter and an ova.

OSHA and CRES made a level D entry to observe structural conditions in the building.

PRP Vernon signed CERCLA (106) Consent Order provided by CRES, thereby accepting responsible party (RP) status.

AUGUST 8, 1987

It was noted that debris from the collapsed roof covered drums of unknowns. Compressed air cylinders noted on the roof near the drums. Seven high voltage oil-cooled transformers were observed on the roof of the Visual Packaging work area.

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Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

A pool of water/oil noted at the bottom of the elevator shaft in the sub-basement. Heavy metal (lead) containing compounds noted in 50-lb. bags in the woodshop area.

AUGUST 12, 1987

Action memo was submitted into concurrence chain this date.

Site name was officially changed from the Visual Packaging Company Site to the Belfield Avenue Site.

AUGUST 20, 1987

OSC Arai received notification at 1000 hours that the action memo had been approved by the Regional Administrator.

OSC activated TAT and ERCS to initiate this CERCLA removal action.

AUGUST 21, 1987

RP Vernon stated that he intended to arrange for the recycling of solvents contained on the first floor of the building within the Visual Packaging portion of the facility. He also planned to transport the manufactured glue products to a former tenant and owner of the products.

OSC Arai briefed OSHA, CRES, Philadelphia L&I, Fire Marshall's Office, City Managing Director's Office, and TAT on removal plans and site status.

AUGUST 24, 1987

OSC and TAT briefed ERCS on site history and current status.

Building was vandalized over the weekend while guard was on duty.

TAT on scene to provide engineering service and recommendations regarding structural integrity of damaged roof area and building.

ERCS asbestos removal subcontractors on scene to evaluate suspect asbestos on pipe insulation in collapsed roof area of facility.

OSC and TAT located vitamin supplements and dietary products in basement area of facility. RP Vernon claimed that the products had been abandoned approximately two years earlier.

Ceramic glazing products (metals) were also located in the basement and reported to be of the same vintage as the vitamin products.

AUGUST 25, 1987

ERCS initiated inventory of safely accessible containers.

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Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

Two asbestos removal contractors assessed the site. Duall, Inc. representative Robert Bartles stated that no bid would be submitted until the walls were shored up or a waiver was signed by the OSC for responsibility of his worker safety. OSC Arai would accept no such liability.

OSC contacted EPA HQ (Dizubian) to discuss problems encountered in obtaining asbestos removal subcontractors.

AUGUST 26, 1987

ERCS completed inventory of drums/containers that could be safely accessed.

Bently, Inc. and Falcon, Inc., asbestos removal subcontractors, were on scene to draft bids for asbestos removal. Bently requested written verification from EPA that employees performing asbestos removal would not be exposed to any type of hazardous materials during the removal operations.

RP Vernon continued to identify and arrange for products to be removed from the site.

Verbal results were received 1330 hours this date for suspect asbestos pipe insulation samples collected 8/25/87. Data indicated samples were approximately 48% asbestos.

OSC Arai met with ERS Chief Massey, DPO Heston, EPA ERD Colleen Carruthers, EPA HQ Jackie Dizubian, and EPA Contract Officer Dick Mueller via telephone regarding the level of effort for work completed to date by OHM. OSC felt OHM was severely lacking in performance as directed. This meeting was held to seek a solution. If ERCS could not provide personnel as requested to begin activities, a cure notice would be issued and HQ would provide an alternative contractor.

At 1600 hours, Tony Lillie (OHM) contacted OSC to verify that an asbestos contractor (Duall) would be on scene at 0800 hours the next morning to begin asbestos removal activities.

AUGUST 27, 1987

Demolition operations were initiated by ERCS; ERCS subcontractors did not adhere to outlined safety protocol and violations were observed. Personnel were warned of the violation and OSC Arai was briefed on the situation. OHM was not coordinating subcontractor activities, therefore operations were discontinued.

Asbestos crew began setting up and preparing the site for asbestos removal.

100033

Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

ERCS mobilized two certified industrial hygienists to the site.

S.T. Engineering representative and Cagley and Harmon Engineering arrived on scene at approximately 1215 hours. ERCS RM notified Cagley and Harmon their services were not required at 1230 hours.

At 1500 hours, OSC Arai directed TAT to stand down as all ERCS personnel had been previously directed to cease operations and prepare for a meeting. At 2000 hours, a site meeting was held at the Region III TAT Office.

ERCS proposed that the walls be shored and that steel trusses be braced strategically as specified by their structural engineer prior to the initiation of any other operations. It was also proposed that a demolition subcontractor perform demolition operations only in areas remote to any hazardous materials.

AUGUST 28, 1987

ERCS initiated shoring operations.

ERCS structural engineer provided the OSC with a written plan relative to scopes of the contractor work discussed at the site meeting held 8/27/88.

RP Vernon was informed of the work plans.

Verbal analytical data on the content of airborne asbestos in the building was reported to be well below detection limits for asbestos. This prompted OSC Arai to downgrade personal protection for shoring operations to level D.

OSC/DPO Jerry Heston was on scene to evaluate the site safety plan and provide recommendations for further development of the plan.

William Zimmerman, City of Philadelphia Asbestos Control was on scene and expressed satisfaction with OSC Arai's plans regarding asbestos removal and stated that his office could respond within approximately one hour if assistance were required.

AUGUST 31, 1987

Structural engineer approved shoring operations completed by ERCS.

TAT collected dust samples from the floor of the woodworking room where the roof had collapsed. Samples would be analyzed for metal and asbestos content by Wastex Labs.

TAT RSO (B. Khona) on scene to evaluate the startup of asbestos removal operations and site safety.

100034

Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

SEPTEMBER 1, 1987

Asbestos removal contractor, (Duall, Inc.) completed removal of asbestos-containing materials.

After speaking with ERT Cibulskis and OHM Hein, OSC Arai decided to implement the Removal Cost Management System (RCMS) computer program beginning 9/3/87.

ERCS hired demolition subcontractor (Cleveland Wecking) who would begin on 9/3/87.

Air samples were collected during and after asbestos removal operations.

SEPTEMBER 3, 1987

ERCS established an additional emergency exit via a secured ladder from the second floor to the ground.

ERCS changed RMs who was briefed on all site activities.

ERCS subcontractor began to remove the collapsed roof from the drums. Sheet metal was removed to ventilate the area. Window panes between the collapsed roof area and warehouse were cut out.

SEPTEMBER 4, 1987

RAM readings indicated very low dust levels within the building during removal activities.

OSC Arai contacted ATSDR regarding verbal analytical results received on dust samples. All personnel were to wear heavy dust masks approved for asbestos and lead.

Duall transported all bagged asbestos off site this date.

A small fire erupted in an electrical conduit during cutting operations. Fire was extinguished when conduit was cut on either side and dropped to the floor.

SEPTEMBER 8, 1987

EPA, TAT, and ERCS had RCMS on line and set up on interface with their Findlay, Ohio, office.

OSC directed ERCS to secure a trailer for equipment storage.

SEPTEMBER 9, 1987

TAT prepared a package for ATSDR relative to analytical results on dust samples collected 8/31/87.

OSC spoke with OSHA Ernest Willis regarding roof demolition

Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

operations. OSHA requested a meeting with the crew foreman of Cleveland Wrecking on 9/10/87.

SEPTEMBER 10, 1987

Cleveland Wrecking mobilized a dump trailer to remove scrap metal.

OSC Arai directed ERCS to decontaminate the roof scrap prior to transport off site for salvage by the wrecking crew.

OSC notified SEPTA representative Ron Patton, RP Vernon's son John, City of Philadelphia Building Inspector's Office, and Cynthia Nadolski, ORC, regarding the structural integrity of the south wall of the building on site. ERCS structural engineer felt that the SEPTA passenger platform may have been supported by the wall and would present a hazard in the future.

SEPTEMBER 11, 1987

ERCS mobilized a trailer for equipment storage at 0900 hours.

ERCS decontaminated the scrap metal and began loading it for transport off site.

SEPTA representative Matt Trzepacz told OSC Arai over the phone that he would send out a representative to assess the passenger platform situation on 9/11/87 or 9/12/87.

ERCS relocated drums to an area isolated from where the wrecking crew was working.

Problems arose with RCMS program and the printer malfunctioned making it impossible to update RCMS as previously scheduled.

Debris from the roof prevented access to drums and would have to be removed.

ERCS covered exposed materials with visqueen in case of rain over the weekend.

SEPTEMBER 14, 1987

ERCS mobilized two technicians and a chemist for drum inventory, staging and sampling.

OSC Arai directed ERCS to contain decon water generated on site and to sample cement blocks to determine if they were of a hazardous or non-hazardous nature.

TAT updated/amended the site safety plan for air monitoring. TAT continued air monitoring and air quality survey near drums/containers with an HNU photoionization detector and explosimeter.

Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

RP Vernon stated to OSC Arai that he would contact the former tenants to request they remove glue products and vitamin supplements from the premises. Mr. Vernon informed OSC that he sold clay and clay pigments to a local school. He also intended to bulk and analyze the remainder of materials on the roof, in the basement, and in the Visual Packaging portion of the facility to be disposed of in an environmentally safe manner. Mr. Vernon also agreed to sell empty 55-gallon drums to ERCS to hold water until they could make arrangements for containment.

OSC contacted Ed Parker of Methods Research regarding the glue products which are still on site. Mr. Parker stated that he intended to have a representative on site to remove the products from the premises some time this week.

OSC contacted Herb Fletcher of Danladi Construction Company who agreed to dispose of the vitamin supplement materials.

SEPTEMBER 15, 1987

RP Vernon was informed that all personnel must wear the appropriate safety attire prior to entry. He agreed to comply with the site safety plan.

ERCS set up a 5000-gallon pool to contain decon water on site.

ERCS uncovered a fiber drum (approximately 35 gallons) labeled zinc dust. The drum appeared to be wet and was overpacked in a 17H drum. The OSC notified the Philadelphia Fire Department of its presence on site. OSC Arai was concerned that hydrogen gas was being generated by an exothermic reaction due to moisture in the drum.

ERCS continued to move drums as required for the wrecking crew to continue roof demolition operations.

TAT submitted analytical package for ATSDR regarding asbestos and heavy metal contaminated dusts.

SEPTA representatives LaGuardia and McMenamer were on scene to inspect the structural integrity of the freestanding wall adjacent to the SEPTA tracks and passenger platform. SEPTA intended to contact RP Vernon regarding the situation.

SEPTEMBER 16, 1987

TAT performed vendor search for manufacturers and/or distributors of powdered zinc products to determine if they were reusable, if vendors would be interested in using them, and in what state they would have to be in to be transported and reused, as well as the implications if the contents of the drum were in fact wet. The zinc would have to be stabilized prior to transporting for reuse.

Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

OSC contacted Special Hazards Management Company (SHMC) to inquire about options available to stabilize the zinc. They recommended that the product be "slurried" with water and allowed to react to a stable material (zinc oxide). OSC Arai agreed to use SHMC pending a test of the procedure with a sample quantity of the zinc powder.

One load of roof scrap was loaded and transported off site.

ERCS began a nitrogen purge inside the overpack (17H) drum in order to maintain an inert atmosphere for any potential hydrogen gas release from the fiber drum of zinc powder. A visqueen "glove bag" was erected around the drum.

SEPTEMBER 17, 1987

Cleveland Wrecking completed cutting and loading decontaminated roof scrap at 1430 hours and two truck loads of scrap were transported off. Cleveland Wrecking demobilized from the site.

OSC, TAT, and ERCS met with SHMC representatives at 1030 hours to discuss final arrangements for testing the "reaction" of zinc dust.

OSC Arai contacted ERT Bob Cibulskis regarding the problems with RCMS and came to a mutual agreement based on site-specific circumstances that it was not feasible to bring RCMS on line and up to current status for this site. OSC directed TAT and ERCS to place RCMS on standby for the remainder of removal activities.

ERCS relocated the drum of zinc dust to an isolated area of the woodworking area under a section of intact roof to protect it from rain.

ERCS placed visqueen on the facility floor to be used as a liner for drum staging.

SEPTEMBER 18, 1987

One truck load of scrap metal was transported off site this date as well as Cleveland Wrecking's equipment.

SHMC representatives took two samples (approximately 100 grams each) from the drum containing zinc dust at 1315 hours; one to be analyzed for metals and the other reacted with water on site. A sample of zinc dust was taken to the roof of the building and mixed with water to test for reaction; a very slow oxidation reaction and slight change of color occurred after 15 to 20 minutes. The reaction was completed after approximately 45 minutes without any other incidents. No significant levels of hydrogen were detected with monitoring instruments.

100038

Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

Since the top portion of zinc dust was found to be dry, a core sample was taken at 1420 hours and the contents of the drum were determined to be dry. Due to the determination that the zinc was being completely dry, the nitrogen purge was taken off at 1745 hours and the lid was placed on top of the drum to trap any gases that evolved.

SHMC representatives, OSC, TAT RSO, and ERCS RM had a meeting at 1430 hours at which time the OSC determined that the zinc drum would be transported to a RCRA-approved facility ASAP.

SEPTEMBER 19, 1997

OSC changed levels of protection at the morning safety meeting--modified level C in open areas and level B in confined areas.

OSC, RM and OHM chemist discussed sampling of water on site. Labs would be located and water tested for nickel, zinc and EP Tox test.

ERCS constructed staging area with visqueen and foam dike.

OSC Arai spoke with Philadelphia Industrial Waste Management Joe Cerrone to receive permission to pump water into the city sewer system. OSC stressed that only water and no solids would be discharged. Permission was granted at approximately 1245 hours. ERCS began pumping water into the sewer system at 1415 hours.

ERCS discovered an antimicrobial substance, Dowicil S13, in the drum pile and stopped discharging water at 1443 hours. Dowicil S13 antimicrobial agent was determined to be a poison, insoluble in water, and not to be discharged into the sewer system.

OSC Arai called Joe Cerrone again at 1605 hours to warn him of the discovery of the poison and possible release of it into the sewer system as approximately 200 gallons of water had been released.

OSC Arai contacted a representative of a manufacturing company in Pittsburg, CA who stated that Dowicil S13 is used in paint as an antimicrobial agent and is a skin irritant when in powder form. There was no immediate hazard and he would try to find a Material Safety Data Sheet (MSDS) and call back.

SEPTEMBER 20, 1997

ERCS set up a 12,000-gallon containment pool at 1230 hours. Dowicil S13 and contaminated sand were overpacked.

SEPTEMBER 21, 1997

Two representatives from Methods Research were on scene to remove glue containers from basement; total--149 boxes of 24 bottles. 00039

Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

City of Philadelphia Industrial Waste Unit inspector took samples of waste water from the accumulation pool. Two samples were also taken by the OHM chemist.

An additional 25-lb. container of zinc metal dust was found above the flammable storage bunker.

ERCS initiated waste disposal approvals for four separate waste streams on site; zinc powder, debris, waste water (rain and decon) and water from around containers that may have contained poisonous materials.

SEPTEMBER 22, 1987

TAT collected samples from large underground storage tank (UST) as well as from the trench next to the tank. They were unable to locate a second, smaller UST at this time; the RP would have to be consulted for this.

A glass jar (approximately 1 pint, 1/3 full) with crystals around the plastic cap was discovered. The jar was labeled methyl ethyl ketone (MEK) peroxide. TAT contacted HAZLINE and OHMTADS and obtained much information on this material. Material can be shock-sensitive and an explosion hazard. OHM contacted Explosive Ordinance Disposal (EOD) who recommended detonation of the product with something like a plastic charge as opposed to remote opening or breaking. The charge would help to destroy all materials not detonated/ignited by remote breakage techniques.

ERCS began segregating waste streams under chemist supervision.

Asbestos removal contractor (Duall) delivered their final report on asbestos removal, which included air sampling results and disposal manifests.

OSC Arai contacted City of Philadelphia Fire Marshall regarding discovery of MEK peroxide.

THE lowest disposal price for zinc dust was \$1.60 per pound through Chem Waste Management TWI Facility in Sauget, IL.

SEPTEMBER 23, 1987

PRP removed propane tank from the roof of the warehouse. ERCS began drum segregation/compatibility testing.

City of Philadelphia Joe Cerrone contacted OSC Arai and stated that the city was unable to provide analysis of 9/21/87 water samples. They requested EPA resample the collection pools and forward the results to the city for a decision on whether or not the water could be accepted by the city's water treatment plant. 100040

Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

OSC Arai contacted Charlie Miller, a former employee of the ceramics facility that had once operated from rented space in the building. Most of the materials under the collapsed roof had been left behind from this operation. Mr. Miller provided helpful information concerning many of the remaining containers.

SEPTEMBER 24, 1987

The level of protection inside the building was upgraded to level B at all times as per OSC direction. Exclusion zone was expanded to include loading dock area.

ERCS mobilized a mercury vapor monitoring instrument as a result of the OSC's telephone conversation with former foreman of prp Allied Mozel who indicated that phenyl mercuric acetate had previously been used in Allied Mozel's processes. Instrument had a dead battery and could not be used thereby hindering operations. The contamination reduction corridor and exclusion zone line were relocated near the front entrance to the facility to allow for proper personnel safety as phenyl mercuric acetate is known to emit very hazardous mercury vapors at low concentrations.

The fork lift was moved by RP Vernon from Bag Manufacturing plant to the burned factory area. In order for the fork lift to be moved from the area where it had been stored, the container storage area was relocated to allow access. Approximately three hours of ERCS and TAT time was required to accommodate the RP. RP personnel wore no personal protective equipment when in the exclusion zone.

OHM chemist contacted labs to solicit three bids for sample analysis. OSC Arai believed this function should have involved corporate (OHM in-house) support, but did not. This lack of support impeded site activities and subsequently prevented the initiation of identification and sampling operations as previously directed by the OSC. In this instance, the chemist performed the function of a PCT to locate a lab, and the OSC challenged rates on dailies to determine if the chemist hourly rate were applicable to the work performed.

SEPTEMBER 25, 1987

OSC Arai contacted Region II OSC Kodama regarding zinc dust disposal. OSC Kodama recommended not to use New Jersey Zinc and suggested the possibility of combining material from a Region II removal with this projects' material. Due to distance involved, this option would not be cost effective.

OSC contacted ORC Larry Falkin and was advised against returning the zinc dust to New Jersey Zinc for reuse due to prior RCRA violations and consent orders as well as current status with EPA CRES and RCRA sections.

Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

OSC contacted EPA Region II RCRA Section and State of New Jersey to inquire if State Metal Industries in Camden, NJ, were a viable interested party to take custody of zinc dust and reuse the material in zinc smelting and metal salvage operations. OSC was advised to proceed as State Metal Industries had an EPA ID Number with no history of RCRA violations.

ERCS and TAT initiated drum sampling operations.

ERCS collected water samples from the containment pool for disposal analysis by Waste Conversion, Inc. Composite samples of contaminated solids were also collected and submitted to Waste Conversion for disposal analysis.

SEPTEMBER 26, 1987

TAT began to identify and profile waste streams on site; nine were identified. TAT prepared sampling methodology and a preliminary list of options for treatment/disposal of waste streams.

SEPTEMBER 28, 1987

ERCS loaded rolloff with debris. Samples of contaminated debris were sent to Chem Waste with waste profile sheets.

ERCS took four samples of paint wastes to be analyzed for PCB, PCP, mercury, cadmium, lead, zinc, and total chromium by Princeton Labs in New Jersey.

ERCS relocated flammable material to flammable storage room on the main floor of the facility.

SEPTEMBER 30, 1987

A total of five 20-cubic yard rolloffs filled to date.

ERCS began decon of building floor, fixtures, and ERCS equipment in preparation for partial demobilization. ERCS completed staging and sampling of 55-gallon drums.

OSC awaited analytical results from Princeton Labs. A 24-hour turnaround was not delivered due to extraction limitations inherent in the sample matrix (latex paint products).

OCTOBER 1, 1987

OSC Arai contacted Regional dioxin expert (Walter Lee) regarding the possibility that dioxin could have been generated during the fire due to suspect PCB/PCP contamination. Mr. Lee informed the OSC that the action level for dioxin is 1 ppb.

OSC Arai was informed by ORC Nadolski that RP Vernon had completed all activities as agreed upon in the consent order.

100042

Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

OSC informed CRES Steuteville that damaged containers and hazardous materials/wastes still existed on the Visual Packaging facility and further that RP Vernon had stated to the OSC on prior occasions that he could properly dispose of all materials previously used in this area.

OCTOBER 2, 1987

ERCS and TAT initiated sampling of 5-gallon pails.

OSC contacted RP Vernon regarding disposal status of materials that remained on the Visual Packaging property. Some of the materials had been staged and the RP was in the process of identifying usable materials, returning materials to manufacturers, and disposing of unusable materials. Approximately 40 5-gallon containers of ceramic glaze with a Charltan Company label could be reused by RP Vernon to Wyncote Academy and Wordsworth Academy. OSC agreed to give RP these materials for proper distribution and use to prevent the project from incurring disposal costs.

Zinc and aluminum metals were shipped. State Metals rejected the materials under the misconception that they were metal shavings and not pure dusts and therefore could not use them in their process.

OCTOBER 3, 1987

ERCS completed sampling of drums and pails.

TAT installed data base file to load inventory and drum log information for treatment/disposal cross reference.

A five-gallon can labeled Alcan Gold Dust (approximately 50 lb.) was located on site.

OCTOBER 5, 1987

F.W. Winter, Inc. (FW) representative on scene to inspect metal powders for possible reclamation. FW representative stated to OSC Arai that he may be interested in reusing the products. OSC directed ERCS to obtain analytical data to support that the contents of the containers were in fact pure product.

ERCS completed bulking of approximately 100 containers that were 1-gallon capacity or less. The three waste streams generated were paints, resins and adhesives and. A sample was taken of each waste stream. ERCS also sampled 1-gallon capacity or less containers with unknown materials.

CRES Steuteville informed OSC Arai that RP Vernon and former owner of Allied Mozel had been given verbal notice of their PRP status; however, CRES and ORC requested written follow-up by OSC Arai.

100043

Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

TAT contacted Alcoa regarding "gold dust." Alcoa representative stated that the product was comprised of approximately 80% copper, 20% zinc, and 3-4% stearic acid.

ERCS chemist informed OSC that samples previously believed to be latex paints were actually some of the Charlestan glazing compounds. Materials were misidentified due melting of the containers and similarity between the physical appearance of the products.

NOVEMBER 23, 1987

OSC Philip Younis assumed site lead responsibilities from OSC Arai and ensured that site progress continued while awaiting disposal approvals.

DECEMBER 22, 1987

Five rolloff boxes with contaminated debris were transported off site to Waste Conversion in Hatfield, PA.

Two 5000-gallon tank trucks pumped out containment pools; liquid was transported to Chem-Clear in Chester, PA for treatment and disposal. The pools were disassembled and removed from the site.

DECEMBER 23, 1987

The last remaining rolloff box was transported to Waste Conversion, Hatfield, PA, for transport and disposal. Site temporarily shut down to await additional sampling/disposal analysis; security guards remained on site.

MARCH 28, 1988

ERCS sampled approximately 40 drums and/or buckets for disposal analysis.

OSC informed ERCS that EPA would not be responsible for damages to the command post during non-active periods.

MARCH 29, 1988

ERCS completed inventory and sampling of containers on site. ERCS delivered samples to AnalytiKEM for hazardous waste characterization analysis; bulking scheme would be devised from lab results.

Site temporarily shut down awaiting analytical results.

JUNE 13, 1988

OSC tasked TAT to research disposal of PCP waste stream.

TAT met on scene with ERCS chemist, disposal coordinator and a Galson representative to discuss the treatment process, project time frame, start up date and cost estimation. No cost estimation could be given at this time.

100044

Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

AUGUST 17, 1988

ERCS subcontractor Galson Research was selected to perform on-site dechlorination process to break down PCP waste.

TAT contacted David Jones of ThermalKEM, Inc. regarding disposal of wastes after Galson Research's process removed PCP contamination. ThermalKEM would accept this waste provided that analysis performed after treatment showed PCP and dioxin levels less than 2 ppb, or not detected. ThermalKEM had accepted wastes from the Galson Process in the past. Wastes must also not be classified as F listed wastes.

Galson Research received a purchase order from ERCS and began lab scale treatment tests.

Additional funding request completed and submitted into the EPA concurrence chain this date requesting that the \$1,026,000 ceiling be increased by \$300,000 to \$1,326,000 to be used in fiscal year 1989 for disposal operations. A 12-month limit exemption was also completed.

AUGUST 24, 1988

TAT met with OHM and Galson representatives on site to discuss start up dates and set up time to begin treatment process.

OSC Younis submitted a memo to CRES Steuteville describing lack of initiative by RP to begin cleanup.

SEPTEMBER 1, 1988

Funding Increase and 12-Month Exemption Request approved this date.

SEPTEMBER 7, 1988

ERCS electricians installed a 3-phase power hookup near the building entrance in preparation for Galson Research's on-site treatment. A housing for the electrical meter had not been located as of this date, but would be installed as soon as possible.

OSC Younis delivered a letter to CRES Steuteville to inform him of the RP's failure to comply with the consent order. OSC awaited information from CRES as to other areas of the building. If EPA needed to assess and remove the wastes in other areas, additional funding would be necessary.

SEPTEMBER 12, 1988

ERCS remobilized to prepare for the treatment process of PCP-contaminated wastes. ERCS began bidding for installation of additional fencing and for contractor to shore up the unstable wall in the drum staging area.

Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

OSC contacted CRES Steuteville regarding RP actions to address the wastes that remained unsecured in the back section of the building.

Philadelphia Hazmat Captain McAleer on scene for a site tour.

Security service was immediately terminated due to extensive damage to command post by night guards.

SEPTEMBER 13, 1988

ERCS RM took two one-guart samples of water from the floor of the waste storage area. The samples were taken to QC Labs, Inc. for 48-hour turnaround.

RP Vernon and Hal Wolfe (prospective buyer of building) on scene to speak with OSC Younis. Mr. Vernon stated that 10 flammable drums in the building had been cleared for removal to a permitted facility, but had not been taken off site as yet.

ERCS RM was in contact with Bob Peterson of Galson Research to verify the location of a fire exit door in the fence. Mr. Peterson wanted the water on the floor of the waste storage area removed at the last possible moment to avoid any refilling that may occur.

Diking for the drum staging area and the reaction processing area would be done with 30-mil hypalon rubber sheets raised over a timber perimeter, as specified by Galson Research.

SEPTEMBER 14, 1988

Sitecast Construction Company could take care of the fire doors in the fence. An estimate of \$2,580 was given for the fire doors, tearing down the buckled wall and supporting the roof.

ERCS obtained a permit for use of the fire hydrant to hook up a fire hose to be kept on standby in case of fire.

SEPTEMBER 15, 1988

Damaged command post was removed and replaced at no expense to the project.

SEPTEMBER 19, 1988

RP Vernon, OSC, CRES and TAT walked through the building at 1100 hours this date. CRES Steuteville indicated to RP Vernon that he must identify and deal with the drums for which he was responsible. Any drums for which RP Vernon did not assume responsibility would be sampled and included in the EPA removal action.

Anchor Fence on scene to begin construction of security fence around the processing area.

100046

Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

SEPTEMBER 20, 1988

RP Vernon on scene at 1045 hours to take a composite sample from the drums on the roof.

OSC Younis and TATM Scott made a Level B entry into the basement of the building on Mr. Vernon's side to make floor sketches and inventory potential hazards on this floor.

SEPTEMBER 21, 1988

RP Vernon on scene at 1000 hours to stage drums on the roof and take a composite sample of each. Mr. Vernon conducted some quick field tests to see if some of the contents were flammable and could be used as a fuel. He was preparing to pump drum contents into a tank truck within the next two weeks. After speaking with Mr. Vernon, OSC and TAT concurred that although Mr. Vernon had good intentions, he did not have the time or resources to effect the proper cleanup for the waste materials in the left side of the building where he operated his business (Visual Packaging).

Jim Roeder of Galson Research was on scene at 1215 hours for a site tour and an update on preparations. He claimed that it would take approximately two weeks for Galson Research to set up and approximately one week to load the waste into the process chamber. The neutralizing process would take approximately two weeks running 24 hours a day/7 days a week.

SEPTEMBER 22, 1988

Inventory and arrangements were made by TAT and ERCS for containers on Mr. Vernon's side of the building to be sampled for compatibility so that material waste containers could be bulked to reduce the number of waste streams as well as associated costs for disposal analysis of each waste stream.

OSC Younis made several attempts to contact RP Vernon concerning the waste containers on his side of the building, but Mr. Vernon was not reachable. Therefore, the OSC decided that all plans to identify and appropriately handle waste containers on Mr. Vernon's side of property must proceed in a timely fashion to effectively complete site cleanup. The OSC still wished to cooperate with RP Vernon, but would not tolerate any additional delays.

SEPTEMBER 23, 1988

ERCS pumped the standing water from the floor of the drum staging area into the sanitary sewer line (prior approval had been received from the Sanitary Authority).

OSC contacted RP Vernon to update him on upcoming sampling plans and again requested that he appropriately handle all materials and containers in the area where he operated the Visual Packaging

Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

Company. All materials would be sampled for compatibility so that material waste containers could be bulked to reduce the number of waste streams and associated disposal costs.

TAT completed floor sketches and inventory of drums to be sampled on RP Vernon's side of the building; first floor, basement and roof of Visual Packaging were surveyed. TAT estimated that 150 to 200 containers of unknowns existed and should be sampled.

SEPTEMBER 26, 1988

Two ERCS sample teams began sampling of the basement, first floor and roof on Visual Packaging side of the building. Basement sampling was completed and 2/3 of the roof was sampled. Drums on the roof obtained readings of 100% LEL on the explosimeter denoting flammable liquids, and 200-300 ppm readings on the HNU. No readings above background were obtained on either instrument on drums in the basement. There were no readings above background obtained on the radiation meter in either area.

ERCS electricians prepared hookups for the generators. It would take approximately two additional work days to complete hookup operations for generator power.

OSC Younis obtained a permit from the City of Philadelphia to position and use two large generators on the sidewalk outside the processing area. The generators had to be placed outside because Galson would be occupying all available room inside the building.

Galson prepared a list of 30 drums in the drum staging area and requested that a sample be taken from each.

SEPTEMBER 27, 1988

Galson delivered equipment to the site and picked up requested samples taken from staged drums.

SEPTEMBER 28, 1988

OSC tasked TAT to set up a lab through TAT Special Projects for PCB sample analysis. There were seven transformers on the Visual Packaging side of the building that would be sampled for PCBs. Standard turnaround time was requested by OSC.

RP Vernon delivered a composite fuel sample taken by GE on Sunday 9/25/88 from 41 drums; 8 on the first floor and 33 on the roof. RP spoke with OSC Younis and reiterated that he intended to remove the fuels and a few prospect drums within the next 7 to 10 days.

OSC Younis and ERCS Program Management agreed that one PCT would provide adequate subcontractor monitoring/supervision during set-up and on-site treatment phases at significant project cost savings.

Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

SEPTEMBER 29, 1988

ERCS pumped out the rainwater that had accumulated on the drum staging area floor. This would be repeated throughout the project as needed.

Samples taken on the Visual Packaging side of the building were delivered to QC Lab this date. A two-week turnaround time was requested by the OSC.

SEPTEMBER 30, 1988

TAT collected 8 samples for PCB analysis at Wastex Labs: One each from five transformers on the roof, one of water in the diked area where they were located and from two transformers in the basement.

OSC Younis made arrangements to increase site security due to frequent break-ins at night. A guard dog was delivered to site this date at 1700 hours to be posted in the garage door entrance.

Galson began setting up for the on-site treatment process. They will be on site full time for the next 6 to 8 weeks.

OCTOBER 3, 1988

OSC Younis spoke with RP Vernon who stated that Delaware Container would take approximately 60 drums from the Visual Packaging area in about a month. OSC explained to him that a letter of intent was required from Delaware Container before drums could be released.

Galson inquired if any utility lines were buried under the loading dock ramp in case they had to dig down four feet for proper clearance for the reacting vessel. OSC Younis spoke with Mr. Vernon who stated that there were no lines running beneath this area. Mr. Vernon also indicated that EPA may be responsible for any structural changes made to his building. OSC informed Mr. Vernon that any requested repair work must be arranged through ORC.

OCTOBER 4, 1988

Galson received a shipment of 10 drums of potassium hydroxide to elevate the pH of their reagent mixture to 14 plus that would then be used to dechlorinate the contaminated soils and sludges. Then they would be heated (30°C-150°C) and agitated until the reaction was completed. The process would be accomplished in a totally closed system. The treated waste would still be classified as a RCRA waste.

OCTOBER 5, 1988

Galson received a shipment of 4 nix tox air filters with high vapor activity charcoal mediums and 10 additional drums of potassium hydroxide reagent.

Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

OSC spoke with Galson Research Roger Gall to decide what would be done with 6000 gallons of treated waste resulting from processing the 2500 gallons of material. Increase would be due to all the added reagent chemicals that would create a caustic. OSC Younis stated that a sample would be taken and a TSD facility located that would accept caustics. The charcoal filters would be disposed of with the caustics and the water from reaction vessel cleaning.

OCTOBER 6, 1988

Galson received 20 drums of dimethyl sulfoxide (DMSO) reagent.

OCTOBER 7, 1988

Galson received 10 drums of polyethylene glycol reagent and two small office trailers; they were placed inside the building to be used when the process was running 24 hours a day.

Analytical results were received for the PCB samples. All samples were in the range of 2 to 4 ppm and not RCRA wastes. The OSC determined that because all transformers were non-PCB, they could remain on site.

OCTOBER 11, 1988

Galson received a shipment of ten overpack drums for contaminated visqueen, a 10k generator and two motor mixers.

The Philadelphia Fire Marshall was on scene to inspect site security with respect to the general public.

T. O'Hara, ERCS Coordinator, delivered additional analytical reports and site sketches. Included was a list of the PCP-Contaminated containers. Mr. O'Hara also spoke with Galson's manager who stated that the tear-down cost was included in the bid for Phase III and an additional cost would not be incurred.

OCTOBER 12, 1988

Galson's subcontractors on scene at 0700 hours to dig out the loading dock area by approximately four feet to accommodate Galson's reaction vessel. Galson received a radiator for their reaction process.

OCTOBER 13, 1988

Galson received 10 drums of triethylene glycol methyl ether and higher reagent to be used in the on-site treatment process.

OCTOBER 17, 1988

Philadelphia L&I representative was on scene for an update on project activities.

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Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

OCTOBER 18, 1988

ERCS sampled 31 PCP-contaminated containers that Galson needed for their batch process. There were not enough samples taken on the first sampling round of these containers.

ERCS lined the loading dock area with hypalon rubber to serve as a berm for the reaction vessel.

Philadelphia Fire Department Hazmat Administration Captain McAleer on scene to discuss a contingency plan with Lt. Vileikis of Ladder #8 Fire Company and Lt. Farrell of Engine #19 Fire Company who would be first responders on scene should an emergency occur. In that event, was decided that the Philadelphia Gas Works parking lot beside the building would become a staging area and the gas station across the street would serve as an alternate command post.

QC Labs delivered results for samples taken at Visual Packaging.

OCTOBER 19, 1988

RP Vernon was informed that the OSC would like Delaware Container to have the drums that they are claiming off site by 11/6/88. Mr. Vernon stated that he had received a letter of intent from Delaware Container and was mailing it to OSC Younis.

OCTOBER 24, 1988

TAT was putting together a bulking scheme for all the containers located on the Visual Packaging side of the building. These would be bulked simultaneously with the treatment process.

OCTOBER 25, 1988

Ken Sirmarco of Delaware Container notified the OSC by telephone of their interest in the drums on the roof that would be removed as a D001 flammable liquid waste to be incinerated at their facility as an alternative blended fuel in their cement kiln. He verbally guaranteed the OSC that upon receiving a Generator ID # from RP Vernon, they would pump all the flammable liquid drum contents for transport; 11/8/88 was the deadline agreed upon.

The large and small process tanks arrived on scene.

OCTOBER 26, 1988

OSC Younis spoke with Delaware Container representative Sirmarco to determine how they would empty the drums. Mr. Sirmarco stated that work would begin 11/3/88 and that a hose from a tank truck would be run up to the roof to pump drum contents into the truck.

OCTOBER 27, 1988

OSC Younis met with Bob Panning, ERCS Program Director, and Tom O'Hara, ERCS Disposal Coordinator, to discuss the subcontractor's

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**Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)**

work (Galson) completed to date as well as Phase III of the process still to be performed. After discussing the lay out of Phase III with Assistant Superfund Branch Chief Dennis Carney, the OSC decided that the project would be put on hold until contract issues with Galson were resolved and a determination could be made that the on-site treatment process was still the best option to pursue for completing the removal operations.

The electric company was on scene at 1000 hours to raise and shield the wires that the crane will be working under to get the process tanks in the loading dock area of the building.

OCTOBER 29, 1988

Galson placed the 7,000-gallon and 800-gallon process tanks inside the loading dock area of the building.

OCTOBER 31, 1988

OSC Younis spoke with ERCS Program Director, Bob Panning, who stated that he would like ERCS to work with TAT on the bulking scheme for the drums on RP Vernon's side of the building as none were PCP contaminated and would be bulked for disposal.

OSC tasked TAT to gather background information on alternative methods of disposal and the progress made to date by other environmental companies who had processes to incinerate PCP-contaminated liquid and sludge.

NOVEMBER 3, 1988

RP Vernon arrived on scene at 0930 hours and Delaware Container at 1030 hours. Pumping of drums of flammable waste liquids (D001) from the first floor of Visual Packaging began at approximately 1115 hours. A list of drums to be pumped had not been given to the OSC, nor a bulking scheme and a work order from Delaware Container. The OSC informed Mr. Vernon of the proper level of protection he should be using and of the fire and/or explosion threat, but the RP continued to work without any protective clothing.

At 1215 the RP began pumping drum contents with a hose positioned across a public walkway near the train station. TAT advised the OSC of the trip and spill hazards. OSC informed all removal support personnel to stay clear of the RP work area.

A very strong organic odor was noticeable as distant as 200 ft. downwind of the operation. The RP performed no air monitoring during the transfer of flammable liquids.

The drum pumping process was completed at 1300 hours with an approximate total of 1300 gallons being taken off site by Delaware Container to be recycled as fuel products.

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Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

At OSC Younis' request, CRES Steutevill visited the site at 1310 hours. He walked through the building with the OSC and RP and requested that remaining containers also be removed from the Visual Packaging area. OSC gave the RP until Wednesday, 11/9/88, to appropriately remove any or all remaining containers. If not, they would be bulked and sampled for disposal by EPA removal personnel.

NOVEMBER 7, 1988

Philadelphia Hazmat Captain McAleer and Lt. Brennan were on scene. Captain McAleer expressed concern to the OSC that the project was on hold. Due to the two fires and several breaking and entering incidents that had occurred in the past 14 months, he expressed concern that a third fire could cause a major dioxin release.

NOVEMBER 20, 1988

OSC Younis, TAT Mullican and ERCS Program Director Panning met to discuss contractual agreements between Galson Research and OHM. It was determined not to proceed with the Galson process when there were no guarantees or proven "track record" for successful results. After discussing the proposal with Assistant Superfund Branch Chief Carney and Section Chief Steve Jarvela, the OSC decided to discontinue the on-site treatment effort. The PCP material would be secured in a fireproof vault on the site until a more effective disposal option was made available.

NOVEMBER 28, 1988

OSC contacted RP Vernon to inform him that EPA would not continue with the on-site treatment process and the PCP-contaminated containers would be stored on site in a vault.

DECEMBER 1, 1988

A meeting was held on site between ERCS Program Director Panning, and Galson Research President concerning the demobilization of Galson's equipment. It was decided that ERCS would demobilize Galson's equipment during the week of 12/5/88.

DECEMBER 5, 1988

ERCS supervisors and crew mobilized to the site to begin demobilizing Galson's equipment and staging drums to be bulked.

ERCS made minor repairs to the flammable cell on site in order to prepare it for storage of the PCP-contaminated containers. As requested by Philadelphia Hazmat Team Chief Janda, all PCP containers would be overpacked prior to placement in the vault.

DECEMBER 6, 1988

ERCS began overpacking drums and containers on the first floor and in the basement of the Visual Packaging building. There were no readings above background obtained on the HNU.

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Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

Dismantling and demobilizing of Galson Research's equipment officially began this date. A representative of Galson would be on-site throughout this operation to assist OHM personnel.

DECEMBER 7, 1988

Removal of the 7,000-gallon tank took place at 1900 hours due to the necessity to stop traffic on Belfield Avenue.

DECEMBER 9, 1988

OSC Younis conducted a tour of the site with city officials to view operations. Also visiting were John Hadalski (Managing Director's Office), Jerry Janda (Chief of the Hazmat Team of Philadelphia), L&I representatives, and Public Health representatives. All city officials approved of site operations both present and future.

DECEMBER 12, 1988

ERCS completed removal of Galson's equipment this date.

DECEMBER 13, 1988

ERCS reviewed analytical with OSC and TAT to determine criteria that should be considered for implementation of any additional sampling and all TSD arrangements.

DECEMBER 14, 1988

OSC received notice of procurement request approval from EPA Regional Office to increase ERCS ceiling by \$250K.

OSC, ERCS RM and TAT completed review of analytical data and began preparing disposal profiles for bulked waste streams. ERCS sampled 30-34 drums of unknowns to develop a disposal scheme. Sampling efforts were somewhat hindered due to extremely cold weather that caused drum contents to freeze.

A 1½-ton drum lift was brought on scene to remove overpacked drums the roof to be staged on the main floor of the building. At this time, all hazardous material was staged in one area.

DECEMBER 15, 1988

ERCS discovered an 8-oz. jar of methyl ethyl ketone (MEK) peroxide which is moderately toxic and shock-sensitive. ERCS contacted their corporate office for information regarding proper handling of this material.

ERCS resampled approximately 30 PCP-contaminated containers to add to the original depleted samples that Galson had used in their simulation. These samples were stored in the vault in the event that additional analytical became necessary.

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Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

DECEMBER 16, 1988

ERCS developed a plan for the disposal of approximately one ounce of MEK peroxide.

All material belonging to Galson Research was loaded onto a tractor trailer for transport to locations determined by Galson.

The original sliding door of the PCP vault was secured in a closed position by lock and chain.

DECEMBER 20, 1988

OSC Younis contacted Philadelphia Hazmat Captain McAleer to invite him to view the site before demobilization.

Approximately 50 drums were crushed and loaded into a rolloff box.

MEK peroxide was treated and destroyed this date.

DECEMBER 21, 1988

TAT and ERCS made a site walk through for final evaluation before temporary demobilization.

Captain McAleer and Chief Janda were escorted by OSC Younis on a walk through the site to review progress to date and to inspect the location of the PCP material remaining on site.

JANUARY 18, 1989

ERCS personnel on scene to collect new composite samples from the non-PCP drums as required by TSD facilities. The ERCS RM was informed last week that the original samples had been nearly 100% spent by the laboratory, and that more sample volume was needed.

JANUARY 20, 1989

ERCS personnel completed gathering composite samples of the non-PCP waste. ERCS RM worked on disposal for each waste stream.

JANUARY 23, 1989

ERCS RM held a meeting on site with a representative from ThermalKEM to discuss disposal arrangements. The ThermalKEM representative stated that arrangements could be completed by mid March, 1989.

MARCH 17, 1989

OSC Younis learned that transport and disposal arrangements were still ongoing and additional potential disposal facilities would have to be profiled due to rejections from ThermalKEM. As a cost saving measure, the OSC directed ERCS to demobilize the command post and scale down security. The OSC stressed to ERCS that maximum concentration should be placed toward profiling as many

Belfield Avenue Site
Federal On-Scene Coordinator's Report
CHRONOLOGY OF EVENTS (continued)

facilities as possible to expedite transport and disposal arrangements.

JUNE 9, 1989

Two shipments of hazardous waste were transported off site. One rolloff box containing crushed drums and contaminated protective clothing was transported to GSX of Pinewood, SC. A second shipment of 98 drums containing waste PCB, acid liquids, oxidizer liquids, flammable solids, organic solids, base neutrals, cyanide solids and peroxide liquids was sent to ENSCO in El Dorado, AK for incineration.

JUNE 10, 1989

Three truckloads of drums containing base neutral liquids, cyanide liquids, flammable organic liquids and organic liquids were transported to Caldwell Systems, Lenoir, NC for disposal.

At this time, drums of corrosive solids and mercury-based pesticides remained still on site awaiting disposal arrangements and approvals.

OCTOBER 11, 1989

A shipment of 25 drums of hazardous waste solids and one drum of mercury-based pesticides were transported off site to ENSCO in El Dorado, AK. A load of 7 drums of corrosive liquid were transported to Chem Waste Management, Inc. of Newark, NJ. One drum of flammable liquid was transported to Frontier Chemical Waste Process, Inc. in Niagara Falls, NY.

All of the PCP-contaminated waste was secured in a fire-resistant cement vault. Because no alternate plans could be made for its disposal, the OSC declared the project closed as no further actions could be taken.

SECTION VII

PROBLEMS ENCOUNTERED AND RECOMMENDATIONS

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Belfield Avenue Site
Federal On-Scene Coordinator's Report

VII. PROBLEMS ENCOUNTERED AND RECOMMENDATIONS

The problems encountered with the prime contractor, O.H. Materials, Inc. (OHM) included the command post being delivered to the site 24 hours after it was supposed to be there. OHM failed to have the necessary equipment on scene on August 24, 1987 to properly assess the site, resulting in the loss of the first day of the removal. OHM mobilized inoperable equipment to the site, further delaying activities while the situation was being corrected. The OHM chemist solicited laboratory bids for analysis instead of initiating sampling operations as directed by the OSC. This bidding process should have been handled by OHM in house where they have first-hand knowledge of procedures as the chemist was not very field oriented. In addition, OHM displayed improper management when they ran out of breathing air, causing another delay in work activities.

Problems encountered with the subcontractors began with the security company. The guards were not properly informed by OHM of the 24-hour security status for the weekend of August 22 and 23, 1987. This almost caused the site to be unsecured for two days. After four incidents of break-ins and vandalism, the security guard service was changed. The site had to be temporarily shut down on August 27, 1987 due to the lack of subcontractor coordination and numerous safety violations. It took two weeks for the demolition subcontractor, Cleveland Wrecking, to cut the collapsed roof instead of the estimated two days. The workers were members of a union and only worked 8-hour days and did not work on weekends. This situation meant that ERCS had to be placed on standby during those times, therefore incurring per diem and equipment charges that added to project costs. The fence company subcontracted to secure the on-site treatment area was uncooperative and very poor in time efficiency. The laborers did not speak English and on several occasions were sent to work without a foreman resulting in incorrect fencing.

Galson Research Corporation was subcontracted by OHM for on-site treatment of the PCP-contaminated waste. However, when Galson could not give OHM a guarantee for the breakdown of PCP, EPA was advised not to continue with this process. This came about after Galson had set up all of their equipment and were ready to do a test run. There were many costs incurred during the set up which would have been avoided had a guarantee been requested at the very beginning of the subcontractor search.

There was a large discrepancy between the list of PCP-contaminated containers that Galson was given by OHM and the containers that were actually found in the staging area. This created a great deal of unnecessary work as Galson had to have the drums resampled because their lab either did not have enough of the sample or had

Belfield Avenue Site
Federal On-Scene Coordinator's Report
PROBLEMS ENCOUNTERED AND RECOMMENDATIONS (continued)

no sample at all. This was a communications breakdown between OHM and Galson that should have been handled before Galson came on site.

There was considerable confusion in the analytical results of the drums and pails sampled by OHM. No one had complete analytical reports to classify many of the drums, thereby causing work delays that could have been avoided had the original OHM chemist been retained on the job.

The restricted size of the site necessitated the use of roll-off boxes to store scrap metal and site debris. Disposal approvals were not obtained in a timely fashion which meant that additional rental costs were incurred on the roll-off boxes in the interim.

Weather conditions hindered work at times. Heavy rains caused excessive contaminated water runoff and lightening delayed the demolition of the collapsed roof for two days.

Some ways to remedy these problems in the future would be to increase contractor monitoring and pay closer attention to costs. When hiring subcontractors such as Galson Research, OHM should discuss and obtain required guarantees before they are hired.

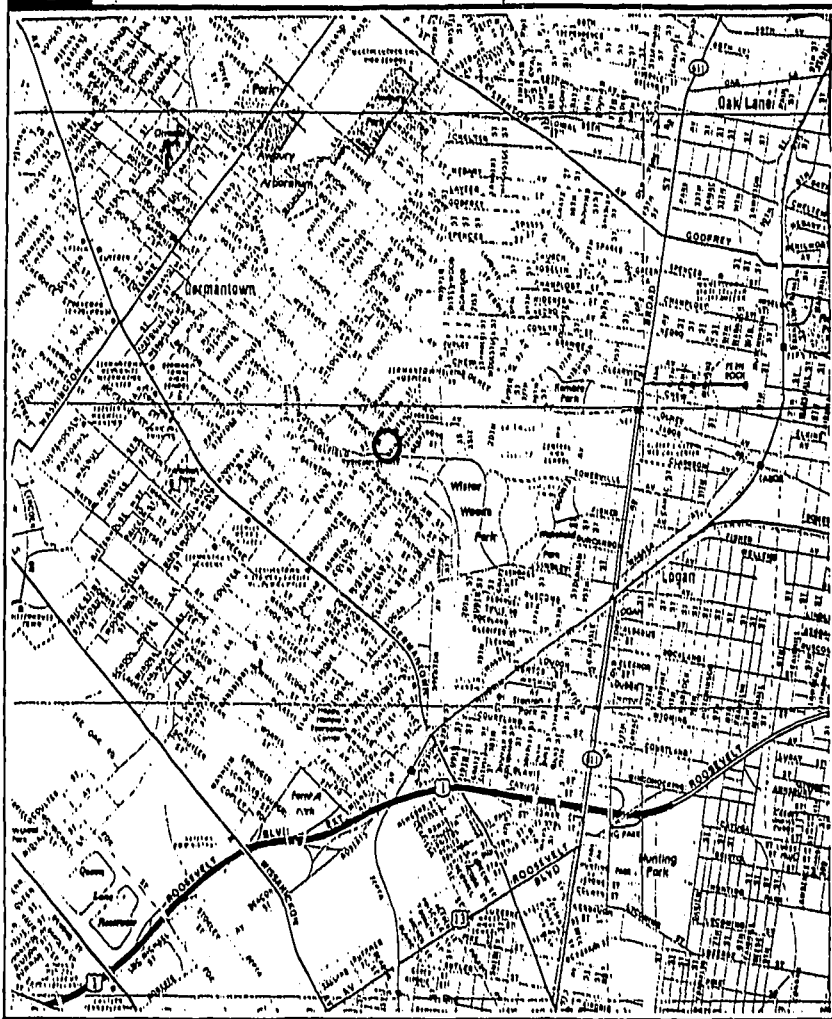
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WESTON-SPER

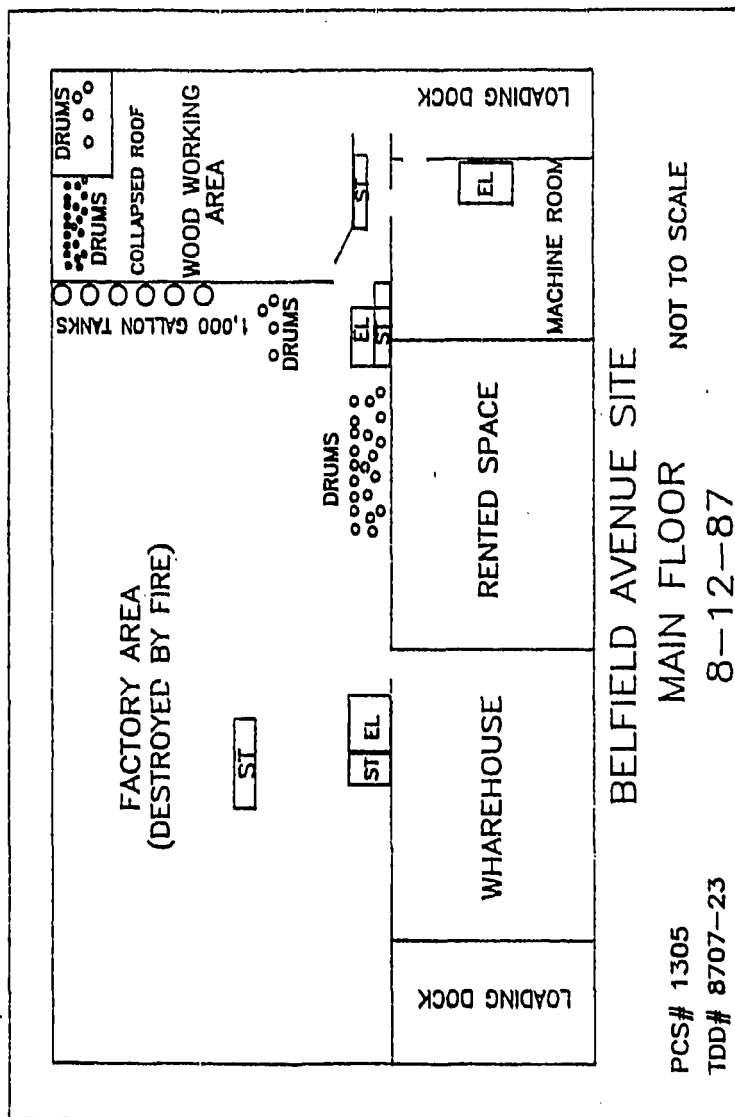
TDD Number: 8707-23

PCS Number: 1305



SITE LOCATION MAP
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA

100081

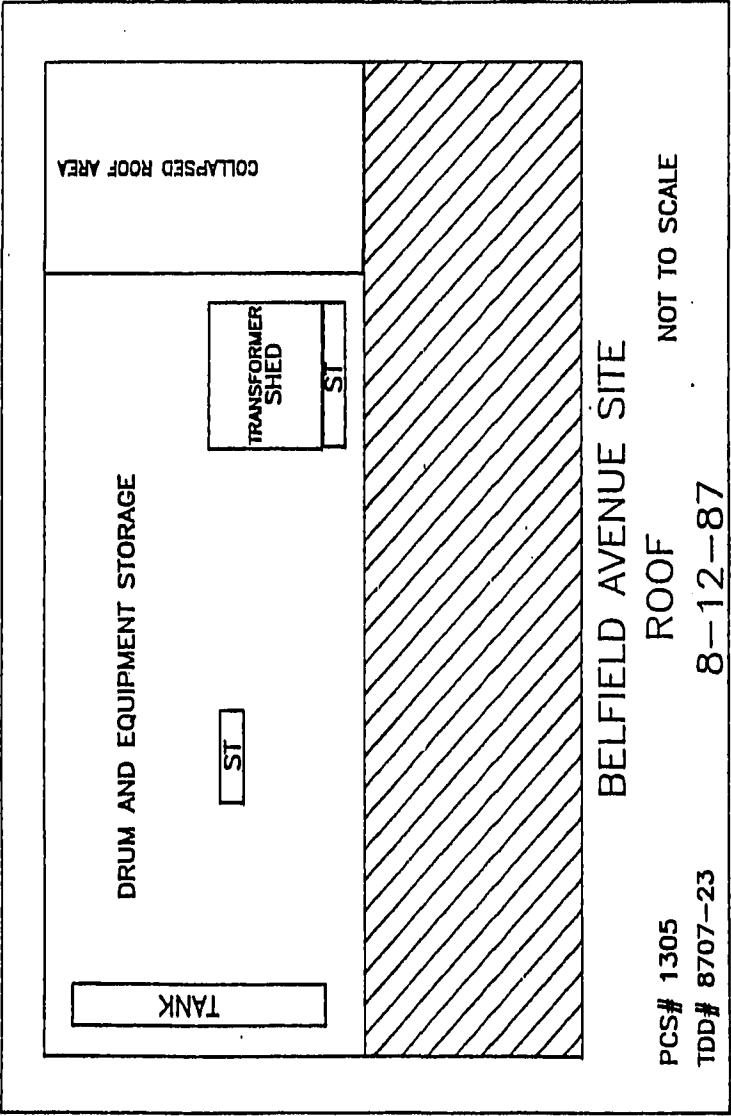


BELFIELD AVENUE SITE

PCS# 1305
TDD# 8707-23

MAIN FLOOR
8-12-87

NOT TO SCALE



PCS# 1305
TDD# 8707-23
ROOF
8-12-87
NOT TO SCALE

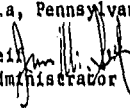
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Funding Request for Removal at Belfield Avenue Site,
Philadelphia, Pennsylvania

DATE: AUG 19 1987

FROM: James M. Seiffert 
Regional Administrator (3RA00)

TO: Dr. J. Winston Porter, Assistant Administrator
Solid Waste and Emergency Response (WH-562-A)

ISSUE

The attached CERCLA funding request pertains to the Belfield Avenue Site, Philadelphia, Philadelphia County, Pennsylvania.

Removal action is necessary to eliminate the threat to public health and the environment due to the presence of substances identified as flammable and toxic materials which remain in a fire damaged chemical blending facility.

Pursuant to the Delegation of Authority 14-1-A (4/16/84), amended by Section 104(e) of Superfund Amendments and Reauthorization Act (SARA) of 1986, which authorizes the Regional Administrator to approve CERCLA removal actions with a total cost of less than \$2 million, I have approved funds in the amount of \$1,026,000 for removal operations at the Belfield Avenue Site.

Attachment

100064

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Funding Request for Removal at Belfield Avenue Site,
Philadelphia, Pennsylvania

DATE:

FROM: Garrett H. Arai, On-Scene Coordinator *GH*
Emergency Response Section (3HW22)

TO: James M. Seif
Regional Administrator (3RA00)

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

I. PURPOSE

An emergency response and subsequent assessments performed by EPA and Technical Assistance Team staff in accordance with the NCP have revealed an immediate threat to human health, welfare, and the environment. This threat is presented by the presence of large quantities of highly toxic and flammable materials located at the Belfield Avenue Site in Philadelphia, Philadelphia County, PA.

Section 104 of CERCLA calls for the initiation of an emergency removal action when there is a threat, or potential threat, of release of a hazardous substance which may present an imminent threat to public health or welfare.

The OSC proposes to initiate a removal action at the Belfield Avenue Site.

In order to initiate this removal action, the OSC is requesting funding in the amount of \$1,026,000. This funding request represents the anticipated costs required to complete the project.

II. BACKGROUND

The Visual Packaging Company, formerly a chemical repackaging and specialty chemical blender company, is located at 5238 Belfield Avenue, Philadelphia, PA. The facility consists of a large, three-story building of approximately 120,000 square feet. The building housed

100065

Visual Packaging and several small businesses which rented space from Mr. Bob Vernon, owner of the building and operator of Visual Packaging. The small businesses were involved in the manufacturing of rugs, furniture, and other wood products. The products packaged and blended at Visual Packaging included hand soap, gasfinder, waterfinder, zinc oxide products, methanol blends, brake fluid, and isopropyl alcohol. Raw materials for the blending were stored in six (6) 1000-gallon tanks located in the Visual Packaging work area and in one (1) 7000-gallon underground tank.

The area surrounding the site is residential in nature, with automobile dealerships located along one side of the building and across the street from the facility. A SEPTA train station is located directly behind the facility. The nearest residence is approximately one block from the facility.

On July 14, 1987, the Visual Packaging Company building was damaged by explosions followed by fire. The cause of the blast was investigated by the City of Philadelphia Fire Marshal's Office, and subsequently determined to be a case of arson. Effects of the blasts on the building included shattered glass, blown out brick and concrete walls, collapsed roof, and general fire damage to portions of the interior. At the request of the Philadelphia Fire Department (PFD), EPA, accompanied by members of the Roy F. WESTON Technical Assistance Team (TAT), responded to the emergency to assist PFD officials due to the presence of hazardous materials.

On July 15, 1987, the EPA Emergency Response Section (ERS), CERCLA Removal Enforcement Section (CRES), and TAT arrived on scene to perform a site assessment. Known flammable and combustible materials and highly toxic materials were observed in the building during this assessment.

On July 23, 1987, a meeting was called by CRES to evaluate the cleanup plan submitted by the PRP. In attendance were Pennsylvania Department of Environmental Resources (PADER), U.S. Department of Labor, Occupational Safety and Health Administration (OSHA), City of Philadelphia Department of Licenses and Inspections (L&I), PFD, and City Managing Director's Office. It was determined that an OSHA assessment of the facility was needed before the plan could be evaluated. L&I stated that the building had been declared Imminently Dangerous (ID) on July 22, 1987.

On July 24, 1987, EPA Enforcement, OSHA, and TAT performed a second assessment of the building.

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It was determined by OSHA that the work plan submitted by Mr. Vernon could begin when Mr. Vernon implemented directives from OSHA (refer to attached POLREP #3).

The site is not on the National Priorities List (NPL).

III. THREAT

The Belfield Avenue Site poses a significant fire and/or explosion hazard due to the large quantities of flammable solvents remaining in the building. The site is open and accessible to the public (including small children who were observed in this residential area during the assessment). Areas of exposure include a SEPTA train station behind the facility, a SEPTA bus stop on a highly traveled main street in front of the building, lack of walls due to the fire and explosion, and physical evidence of previous vandalism within the building. It was also noted that there were seven large, oil-cooled, high voltage transformers on the facility roof, possibly containing polychlorinated biphenyl (PCB) contaminated oils.

The following hazardous materials were observed in the building:

Six 1000-gallon tanks which included three tanks of methyl t-butyl ether, approximately 700 gallons each; one tank of isopropanol, approximately 600 gallons; one tank of mineral spirits, approximately 900 gallons; one tank containing residue of an unknown substance;

one 7000-gallon underground tank of methanol (flashpoint of 50 degrees Fahrenheit);

one 1-gallon can of tetrahydrofuran (potentially shock sensitive and highly toxic material);

one 5-gallon can Aroclor 1242 (PCB);

five hundred cases of manufactured products reported to contain toluene, as well as an undetermined number of containers labeled: Diethylene glycol, sodium silicate, adhesive (unspecified composition), rubber cement (unspecified composition), silicone (unspecified composition), Magic Lux latex, and Silco white lithium #2.

In addition to the highly flammable and toxic materials which were identified on the premises, approximately 300 55-gallon drums and 100 miscellaneous containers containing unknown materials were found throughout the facility. Approximately three tons of lead-based products were also observed.

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Mr. Vernon reported to EPA, ERS and CRES that some of the products found in the building were, in fact, abandoned by the prior tenant, and further stated that he will not accept responsibility for the presence of these products.

IV. PROPOSED PROJECT AND COSTS

The OSC estimates that a removal action will cost \$1,026,000. The scope of work proposed is illustrated in the following phases of the removal action:

Phase I - Control and stabilization: Activities will include the posting of 24-hour site security, removal of debris and the collapsed roof from the building to restore work areas and to allow for a safe work environment, and the cataloging and staging of all hazardous materials.

Phase II - Measuring and sampling: Activities will include remote opening of drums containing unknown substances, sampling of inventoried substances, and identification of these substances.

Phase III - Identification and selection of environmentally sound treatment and disposal options available based on cost effectiveness and data obtained during Phase II.

Phase IV - Treatment/disposal of hazardous materials.

The following are the estimated costs:

ERCS	
Disposal and Transportation	\$ 450,000
Personnel	150,000
Equipment	120,000
Analysis	30,000
ERCS Subtotal	750,000
8% ERCS Contingency	60,000
ERCS Total	\$ 810,000
TAT	60,000
EPA	30,000
Subtotal	\$ 900,000
15% EPA HQ	126,000
TOTAL ESTIMATED COSTS	\$1,026,000

100068

V. ENFORCEMENT

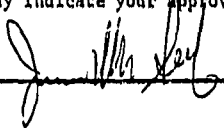
See attached Confidential Enforcement Status.

VI. REGIONAL RECOMMENDATION

Because the conditions at the Belfield Avenue Site meet the NCP Section 300.65 criteria for a removal action, I recommend your approval of this request. The estimated cost for cleanup activities, which will be acted upon by EPA, is \$1,026,000 of which \$810,000 is for the ERCS contractor.

You may indicate your approval or disapproval by signing below.

APPROVAL



DATE

8/19/87

DISAPPROVAL

DATE

100069

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

Request for a Ceiling Increase/12-Month Exemption
for the Belfield Avenue Site

SUBJECT: Philadelphia, Philadelphia County, Pennsylvania DATE: SEP 5 1988

FROM: James W. Skiff Regional Administrator (3RA00)

TO: Dr. J. Winston Porter, Assistant Administrator
Solid Waste and Emergency Response (WH-562A)

ISSUE

The attached CERCLA Funding Request pertains to the Belfield Avenue Site in Philadelphia, Philadelphia County, Pennsylvania.

Removal operations are necessary to eliminate the threat to public health and the environment posed by the flammable and toxic materials present at the Belfield Avenue Site.

Pursuant to Section 104 (e) of the Superfund Amendments Reauthorization Act (SARA) of 1986, and the Delegation of Authority 14-1-A (9-13-87), which authorized the Regional Administrator to approve CERCLA Removal Actions with a total cost of less than \$2,000,000 and approve exemptions to the one year limit, I have approved additional funding in the amount of \$300,000, \$250,000 of which is for extramural costs, to complete the removal operations and an exemption to the 12-month statutory limit. This increases the project ceiling from \$1,026,000 to \$1,326,000.

The additional funding of \$300,000 is for use during fiscal year 1989. There are sufficient funds remaining in the current ceiling to allow work to continue through the end of fiscal year 1988.

Attachments

100070

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

Request for Ceiling Increase/12-Month Exemption
for the Belfield Ave Site

SUBJECT: Philadelphia, Philadelphia County, Pennsylvania DATE: SEP 01 1988

FROM: Phil Younis, On-Scene Coordinator
Removal Response Section (3HW25)

TO: James M. Seif
Regional Administrator (3RA00)

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

I. ISSUE

This is a request for additional funding and an exemption from the 12-month statutory limit to continue and complete removal operations at the Belfield Avenue Site, Philadelphia, Philadelphia County, Pennsylvania. Additional funds are necessary to perform on-site treatment of wastes, and for the subsequent disposal of these wastes. A ceiling increase of \$300,000, of which \$250,000 is for extramural costs, for a new total of \$1,326,000 is being requested to continue removal operations at the Belfield Avenue Site.

II. BACKGROUND

The Visual Packaging Company was a chemical repackaging and specialty chemical blender located at 5238 Belfield Avenue, Philadelphia, Pennsylvania. The facility consisted of a large, three story building of approximately 120,000 square feet. The building housed Visual Packaging and several small businesses which rented space from Mr. Bob Vernon, owner of the building and of Visual Packaging. The small businesses were involved in light manufacturing of rugs, furniture, and other wood products. The products packaged and blended at Visual Packaging included: hand soap, gasfinder, waterfinder, zinc oxide products, methanol blends, brake fluid, and isopropyl alcohol. Raw materials for the blending were stored in six (6) 1000-gallon tanks located in the Visual Packaging work area and in one 7000-gallon underground tank.

The area surrounding the site is residential in nature, with automobile dealerships located along one side of the building and across the street from the facility. A SEPTA train station is located directly behind the facility. The nearest residence is approximately one block from the facility.

100071

(2)

On July 14, 1987, the Visual Packaging Co. building was damaged by explosions followed by fire. The cause of the blast was later determined by the Fire Marshals' office to be a case of arson. Effects of the blasts on the building included shattered glass, blown out brick and concrete walls, collapsed roof, and general fire damage to portions of the interior and stored materials.

At the request of the Philadelphia Fire Department (PFD), EPA, accompanied by Technical Assistance Team Staff, responded to the emergency to assist PFD officials due to the presence of hazardous materials. Known flammable, combustible, and highly toxic materials were observed in the building during this assessment.

On July 24, 1987 EPA Enforcement, OSHA, and TAT made another assessment of the building, and it was determined that the wastes present were hazardous in nature, and the OSC determined that a potential threat to public health was present.

On August 24, 1987, a request for \$1,026,000 was approved, and emergency removal actions began.

During the subsequent removal operations over 300 drums and other containers were recovered from the damaged building. These materials were then sampled and staged within the structure remaining at Belfield Avenue. These wastes are currently staged on-site with 24 hour security and await disposal.

Analysis of the samples taken from the wastes show that over 90 percent of the wastes contain pentachlorophenol (PCP) in concentrations ranging from several parts per billion to several thousand parts per million. PCP is considered a dioxin material because dioxin is a contaminant in PCP and a combustion product of PCP. No disposal can be arranged for a material contaminated with PCP due to the chance of dioxin formation during a fire, or dioxin contamination in the PCP.

It is therefore necessary to treat the wastes to remove the PCP contamination before disposal acceptance can be secured and disposal operations can begin.

III. CRITERIA FOR EXEMPTION FROM STATUTORY LIMITS

Conditions at the Belfield Avenue Site meet the exemption criteria in CERCLA 104 (c), as amended by SARA as follows:

A. There is an immediate risk to public health, welfare, or the environment.

100072

(3)

Currently, there are over 300 drums of highly flammable and toxic materials staged within an arson-prone building which has no physical access controls. This facility is located in northern Philadelphia, 50 feet from a SEPTA train station and bus stop, and less than 100 yards from the nearest residence.

B. Continued response actions are immediately required to prevent, limit, or mitigate an emergency.

Response actions at the Belfield Avenue Site must continue beyond the 12-month statutory limit to remove the staged wastes from the site.

The threat on-site consists of flammable and toxic materials staged in fire damaged containers within a building which lacks physical security. The building has a history of arson, including one fire set in July, 1988. The burning of the wastes could produce the highly toxic dioxin, which would present a great danger to human health and the environment.

C. Assistance will not otherwise be provided on a timely basis.

As of this date, no potential responsible parties have been identified as owners of the on-site wastes. The owner of the building has refused responsibility for these wastes, because they were abandoned by a former tenant. Due to the very specific nature of the required on-site waste treatment, PADER and the City of Philadelphia lack the technical resources to perform the task. The scope of work for this removal action is expected to be completed by December 31, 1988.

IV. PROPOSED ACTIONS

The requested funds will be used in four phases to treat and dispose of the on-site wastes. Phase one and two will consist of the treatment phase, which is to be started during fiscal year 1988 and completed during fiscal year 1989. Phase one and two will have a total cost of approximately \$250,000. Phase three will consist of final analytical work and waste stream generation, and is anticipated to cost \$100,000. Phase four will consist of final transportation and disposal of the wastes and is anticipated to cost approximately \$200,000.

The proposed continued removal actions address the protection of the public health and the environment by the removal of the highly toxic wastes from public access and close proximity. This scope of work does not interfere with any long-term remedial cleanup actions, because no remedial actions are anticipated at the site.

100073

(4)

V. SUMMARY OF COSTS

	CURRENT CEILING	PROPOSED CEILING
ERCS	\$810,000	1,060,000
TAT	100,000	100,000
EPA (Direct)	30,000	55,000
EPA HQ (Indirect)	70,000	111,000
TOTAL	1,026,000	1,326,000

VI. REGIONAL RECOMMENDATION

Because conditions at the Belfield Avenue Site meet the criteria set forth in Section 300.65 of the National Contingency Plan, and also meet the criteria in CERCLA Section 104 (a) to be exempt from the 12-month statutory limit, I recommend your approval of this Additional Funding Request/Request for Exemption from the 12-Month Statutory Limit. The estimated costs are \$300,000, of which \$250,000 is for extramural costs, and the new project ceiling will be \$1,326,000.

You may indicate your approval or disapproval by signing below.

APPROVAL

DATE

9/1/88

DISAPPROVAL

DATE

100074

BELFIELD AVENUE SITE
SITE SAFETY PLAN

100075

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PENNSYLVANIA

SITE SAFETY PLAN

Prepared by: USEPA Technical Assistance Team

I. GENERAL

THIS PLAN ADDRESSES THE SAFETY PROCEDURES THAT WILL BE FOLLOWED BY ANY PERSONNEL VISITING OR INVOLVED WITH SITE ACTIVITIES AT THE BELFIELD AVENUE SITE IN PHILADELPHIA, PA. THIS SITE SAFETY PLAN DOES NOT SUPERCEDE ANY FEDERAL, OSHA, PADER OR LOCAL REGULATIONS BUT RATHER IS IN ADDITION TO THEM. IN THE EVENT OF A CONFLICT BETWEEN THIS PLAN AND A REGULATION, THE MORE STRINGENT OF THE TWO SHALL APPLY. THE SITE SAFETY PLAN IS ALSO WRITTEN IN ACCORDANCE WITH OSHA'S DECEMBER "INTERIM FINAL RULE" FOR HAZARDOUS WASTE SITE ACTIVITIES.

LEVELS OF PROTECTIVE EQUIPMENT WILL BE SET IN ACCORDANCE WITH THE HAZARD OF THE PARTICULAR JOB AND THE JOB LOCATION RELATIVE TO SITE HAZARDS. LEVELS OF PROTECTION AND SITE SAFETY PROTOCOL WILL BE UPDATED AS SITE CHARACTERIZATION PROGRESSES.

II. BACKGROUND

The Visual Packaging Company was a chemical repackaging and specialty chemical blender located at 5238 Belfield Avenue, Philadelphia, Pennsylvania. The facility consisted of a large, three story building of approximately 120,000 square feet. The building housed Visual Packaging and several small businesses. The small businesses were involved in light manufacturing of rugs, furniture, and other wood products. The products packaged and blended at Visual Packaging included: hand soap, gasfinder, waterfinder, zinc oxide products, methanol blends, brake fluid, and isopropyl alcohol. Raw materials for the blending were stored in six (6) 1000 gallon tanks located in the Visual Packaging work area and in one 7000 gallon underground tank.

The area surrounding the site is residential in nature, with automobile dealerships located along one side of the building and across the street from the facility. A SEPTA train station is located directly behind the facility. The nearest residence is approximately one block from the facility.

On July 14, 1987, the Visual Packaging Co. building was damaged by explosions followed by fire. Effects of the blasts on the building included shattered glass, blown out brick and concrete walls, collapsed roof, and general fire damage to portions of the interior and stored materials. At the request of the Philadelphia Fire Department (PFD), EPA, accompanied by Technical Assistance Team Staff, responded to

the emergency to assist PFD officials due to the presence of hazardous materials.

On July 23, 1987, a meeting was held by EPA CERCLA Removal Enforcement Section (CRES) to evaluate the cleanup plan submitted by the PRP. In attendance were the following agencies: Pennsylvania Department of Environmental Resources (PA DER), U.S. Department of Labor, Occupational Safety and Health Administration (OSHA), City of Philadelphia Department of Licenses and Inspections (L&I), PFD, and the City Managing Directors Office. It was determined that an OSHA assessment of the facility was needed before the plan could be evaluated. The Department of Licenses and Inspections stated that they had declared the building Imminently Dangerous (ID) on July 22.

On July 24, 1987 EPA Enforcement, OSHA, and TAT made an assessment of the building.

OSHA determined that the work plan submitted by Mr. Vernon could begin when Mr. Vernon implemented directives set forth by OSHA, and which were subsequently incorporated into the scope of work for this removal.

III. SITE SPECIFIC CHEMICAL HAZARDS

The following hazardous materials were observed in the building:

- 6 (six) 1000-gal. tanks which included:
 - 3 tanks of Methyl t-Butyl Ether, (flashpoint: -30 deg. F) approx. 700 gal. each
 - 1 (one) tank of isopropanol, approx. 600 gal. (TLV: 400 ppm, IDLH: 12,000 ppm)
 - 1 (one) tank of mineral spirits, approx. 900 gal.
 - 1 (one) tank containing residue of an unknown substance
- 1 (one) 7000-gallon underground tank of Methanol (flashpoint of 50 degrees Fahrenheit, IDLH: 25,000 ppm, TLV: 200 ppm)
- 1 (one) 1-gallon can of Tetrahydrofuran (potential shock sensitive and highly toxic material, IDLH: 20,000 ppm, TLV: 200 ppm)
- 1 (one) five gallon can Aroclor 1242 (PCB)
- 500 cases of manufactured product reported to contain Toluene
- Diethylene Glycol
- Sodium Silicate
- Adhesive (Unspecified composition)
- Cement Rubber (Unspecified composition)
- Silicone (Unspecified composition)
- Magic Lux Latex
- Siloo White Lithium No.2

In addition, approximately 300 55 gallon drums, and 100 miscellaneous containers containing unknown materials were

found throughout the facility. Approximately three tons of lead based products were also observed.

TLV: THRESHOLD LIMIT VALUE, PERMISSIBLE EXPOSURE LIMIT LEVEL AT WHICH MOST WORKERS WILL NOT SUFFER ADVERSE EFFECTS THROUGH AIRBORNE EXPOSURE TO A CHEMICAL.

IDLH: IMMEDIATELY DANGEROUS TO LIFE OR HEALTH LEVEL AT WHICH MOST WORKERS COULD ESCAPE FROM WITHIN 30 MINUTES WITHOUT SUFFERING ANY ESCAPE-IMPAIRING SYMPTOMS OR ANY IRREVERSIBLE HEALTH EFFECTS DUE TO AIRBORNE EXPOSURE TO A CHEMICAL.

IV. SPECIAL CONSIDERATIONS

A. BUILDING ENTRY

THE BELFIELD AVENUE SITE IS A THREE STORY BUILDING WHICH HOUSED A SPECIALTY CHEMICAL BLENDER AND RENTED BUSINESSES. ADEQUATE LIGHTING SHOULD BE USED TO ALLOW FULL VISIBILITY WITHIN THE BUILDING. PORTIONS OF THE ROOF ARE NOT STRUCTURALLY SOUND, THEREFORE WORK SHOULD NOT BE PERFORMED IN THESE AREAS UNTIL UNSOUND SECTIONS OF THE ROOF CAN BE REMOVED.

B. HEAT STRESS

HOT AND HUMID WEATHER MUST BE CONSIDERED WHEN PLANNING THE WORK DAY. A WIDE VARIETY OF HEAT RELATED DISORDERS CAN BE ASSOCIATED WITH THE RESTRICTION OF BODY COOLING, VENTILATION, LIQUID REPLACEMENT AND ELECTROLITE REPLENTISHMENT. AN ATTACHED SECTION WILL REVIEW SYMPTOMS AND TREATMENT OF HEAT RELATED DISORDERS.

D. TRIP HAZARDS

THE SITE CONTAINS NUMEROUS SLIP, TRIP AND FALL HAZARDS DUE TO THE ABANDONNED NATURE OF THE FACILITY AND THE DAMAGE CAUSED BY THE EXPLOSIONS AND FIRE. BEFORE EXTENSIVE WORK BEGINS IN ANY AREA, AN EFFORT SHOULD BE MADE TO REMOVE TRIP AND OVERHEAD HAZARDS TO THE EXTENT POSSIBLE.

E. UNIDENTIFIED DRUMS/CONTAINERS

HUNDREDS OF UNIDENTIFIED DRUMS ARE PRESENT THROUGHOUT THE SITE WHICH REPRESENT A SAFETY HAZARD. SITE PERSONNEL SHOULD NOT SHAKE, KICK, OPEN, SAMPLE OR HANDLE THESE UNIDENTIFIED DRUMS WITHOUT LEVEL B PROTECTIVE EQUIPMENT. MANY OF THE ON SITE DRUMS MAY HAVE BEEN ALTERED BY HEAT, WEATHERING, AND INTERNAL CHEMICAL REACTIONS. SPECIAL CAUTION SHOULD BE USED IF ANY DEFORMED DRUMS ARE LOCATED. THESE DRUMS SHOULD BE OPENED REMOTELY WHEN THE SAMPLING OPERATIONS COMMENCE. KNOWN DRUM MATERIALS SHOULD BE STAGED BY COMPATIBILITY TYPE. INCOMPATIBLE CHEMICALS SHOULD BE STORED SEPARATELY WITH A PHYSICAL BARRIER AS A CONTAINMENT STRUCTURE.

F. CONFINED SPACE ENTRIES

AT THE BELFIELD AVENUE SITE, MANY FLAMMABLE CHEMICALS WERE IN USE DURING OPERATION OF VISUAL PACKAGING. MANY OF THESE CHEMICALS STILL REMAIN ON SITE IN VARIOUS LOCATIONS. INITIAL BUILDING ENTRIES ON SITE SHOULD BE PERFORMED USING A COMBUSTIBLE GAS/OXYGEN METER AND AN ORGANIC VAPOR DETECTION INSTRUMENT TO DETERMINE WHETHER AN EXPLOSIVE OR RESPIRATORY HAZARD EXISTS. THE BUDDY SYSTEM WILL BE INSTITUTED FOR ALL SITE ACTIVITIES INSPITE OF THEIR INITIALLY PERCEIVED HAZARD LEVEL. ALL CONFINED SPACE ENTRIES WILL CONFORM WITH THE OSHA STANDARD OPERATING PROCEDURE OUTLINED IN THE "OCCUPATIONAL SAFETY AND HEALTH GUIDANCE MANUAL FOR HAZARDOUS WASTE SITE ACTIVITIES" - DHHS PUBLICATION NO. 85-115.

G. ASBESTOS REMOVAL OPERATIONS (SEE APPENDIX E).

H. ON-SITE TREATMENT OF PENTACHLOROPHENOL (SEE APPENDIX F).

V. RESPIRATORY PROTECTION PROGRAM

ALL CONTRACTOR AND GOVERNMENT PERSONNEL INVOLVED IN ON SITE ACTIVITIES SHALL HAVE A WRITTEN RESPIRATORY PROTECTION PROGRAM AND HAVE MEDICAL CERTIFICATION THAT THEY ARE PHYSICALLY FIT TO WEAR A RESPIRATOR. ALL PERSONNEL WEARING AIR-PURIFYING RESPIRATORS ON THE SITE SHALL PROVIDE CERTIFICATION OF FIT TESTING. ALL RESPIRATORY PROTECTION SHALL BE DECONTAMINATED AND MAINTAINED DAILY AT THE END OF EACH WORK DAY AS A MINIMUM.

PERSONS HAVING BEARDS OR MUSTACHES EXTENDING MORE THAN ONE HALF INCH BELOW THEIR MOUTH WILL NOT BE PERMITTED TO WEAR A RESPIRATOR AND AS SUCH CANNOT PERFORM WORK IN AN AREA REQUIRING RESPIRATORY PROTECTION.

VI. DESIGNATION OF WORK AREAS AT THE SITE

ONCE A SPECIFIC WORK AREA IS DESIGNATED, THERE WILL BE THREE (3) FUNCTIONAL ZONES ASSOCIATED WITH IT. THESE ZONES WILL INCLUDE THE EXCLUSION AREA OR "HOT ZONE", CONTAMINATION REDUCTION AREA OR "DECON ZONE" AND THE SUPPORT AREA. THE EXCLUSION AREA WILL BE THE AREA OF GROSS CONTAMINATION OR AREA OF SIGNIFICANT HEALTH HAZARD. THE CONTAMINATION REDUCTION AREA IS THE AREA BETWEEN THE HOT ZONE AND THE SUPPORT AREA DESIGNED TO ELIMINATE THE TRANSFER OF CONTAMINATION OR HAZARD TO OTHER SITE LOCATIONS. THE SUPPORT AREA INCLUDES ALL AREAS WHICH ARE NOT CONTAMINATED OR DO NOT REPRESENT SIGNIFICANT HEALTH HAZARDS TO WORKERS. NO PERSONNEL OR EQUIPMENT CAN ENTER OR EXIT THE EXCLUSION AREA WITHOUT PASSING THROUGH THE CONTAMINATION REDUCTION ZONE. ALL EQUIPMENT WILL BE DECONTAMINATED AT THE END OF EACH WORK DAY TO THE GREATEST EXTENT POSSIBLE.

DESIGNATION OF WORK ZONES AND HAZARD LEVELS WILL BE

ESTABLISHED PRIOR TO THE COMMENCEMENT OF ANY DAILY WORK. A REVIEW OF THE WORK ZONES AND DECONTAMINATION PROCEDURES WILL BE PERFORMED AT A DAILY SAFETY MEETING.

VII. ESTABLISHMENT OF APPROPRIATE LEVELS OF PROTECTION

CONFINED SPACE ENTRY

ENTRIES INTO THE BASEMENT OF THE FACILITY AND THE BACK ROOM IN THE WOOD WORKING SECTION SHALL BE CONSIDERED "CONFINED SPACE ENTRIES". ONLY PERSONNEL AUTHORIZED SPECIFICALLY BY THE OSC SHALL BE ALLOWED ACCESS TO THESE AREAS, AND ONLY FOR THE PURPOSES OF SPECIFICALLY AUTHORIZED TASKS.

ALL PERSONNEL AUTHORIZED TO MAKE SUCH AN ENTRY SHALL BE IN LEVEL B PROTECTION. THESE ENTRIES MUST BE MADE BY AN "ENTRY TEAM" WITH A SAFETY BACKUP WHO WILL MAINTAIN RADIO COMMUNICATIONS WITH THE ENTRY TEAM AT ALL TIMES.

NO PERSONNEL ARE TO APPROACH THE AREA NEAR THE BACK ROOM, NOR THE STACKED DRUMS WHERE THE ROOF COLLAPSED WITHOUT FIRST FULFILLING THE ABOVE STATED REQUIREMENTS, OR UNTIL SUCH TIME THAT THESE AREAS ARE CHARACTERIZED BY MONITORING EQUIPMENT AND THE OSC DEEMS IT ACCEPTABLE TO DOWNGRADE THE REQUIRED LEVEL OF PROTECTION BASED ON MONITORING INSTRUMENT READINGS AND SITE CHARACTERIZATION DATA.

AS ESTABLISHED IN THE CODE OF FEDERAL REGULATIONS ON PAGE 45667 FOR DECEMBER 19, 1987, PERSONAL PROTECTIVE EQUIPMENT MUST BE ESTABLISHED FOR ALL SITE ACTIVITIES IN A MANNER CONSISTENT WITH THE SAFETY OR HEALTH RISK APPROPRIATE TO THAT TASK. TO THE EXTENT NOW POSSIBLE, THE FOLLOWING LEVEL OF PERSONAL PROTECTION WILL BE ASSIGNED TO EACH OF THESE TASKS:

A. DRUM SAMPLING, OPENING AND MATERIAL TRANSFER

ALL SAMPLING OPENING AND MATERIAL TRANSFER WILL BE PERFORMED IN LEVEL B PROTECTIVE EQUIPMENT UNTIL SUCH TIME THAT THE DRUM CONTENTS AND THEIR ASSOCIATED HAZARDOUS PROPERTIES ARE FULLY KNOWN.

B. PROCESS TANK NUMBER INVENTORY

THE OPERATIONS INCLUDED IN COUNTING, NUMBERING, DOCUMENTING RELATIVE LOCATION AND SIZE MAY BE PERFORMED IN LEVEL C PROTECTIVE EQUIPMENT WHICH WILL INCLUDE TYVEK, HARDHATS, WORK GLOVES, SAFETY GLASSES, STEEL-TOE WORK BOOTS WITH BOOTIES, AND APPROPRIATE RESPIRATORY PROTECTION. AN ORGANIC VAPOR DETECTOR WILL ACCOMPANY THE INVENTORY GROUP TO DETECT UNEXPECTED HAZARDOUS VAPOR LEVELS. NO TANK ENTRY OR SAMPLING WILL BE INCLUDED IN THIS FUNCTION.

C. SPILL SAMPLING

ALL SAMPLING OF UNKNOWN SPILL MATERIAL WILL BE CONDUCTED IN LEVEL B PROTECTIVE EQUIPMENT UNLESS THE RESPIRATORY AND CONTACT HAZARD HAS BEEN EVALUATED TO WARRANT DOWN-GRADED PROTECTIVE EQUIPMENT BASED ON GATHERED DATA.

VIII. TRAINING PROGRAMS

PERSONNEL WILL EITHER HAVE FORMAL TRAINING OR DOCUMENTED ON-THE-JOB TRAINING FOR THOSE TASKS THEY ARE ASSIGNED TO PERFORM ON THE ACTIVE SITE.

ALL CONTRACTOR AND GOVERNMENT PERSONNEL WORKING ON SITE WHERE THEY MAY BE EXPOSED TO HAZARDOUS CHEMICALS SHALL PROVE THEY ARE ENROLLED IN A MEDICAL MONITORING PROGRAM.

IX. GENERAL SAFETY RULES

A. THERE WILL BE NO EATING, DRINKING OR SMOKING IN THE EXCLUSION AREA OR DECONTAMINATION REDUCTION ZONES.

B. ALL PERSONNEL MUST PASS THROUGH THE CONTAMINATION REDUCTION ZONE TO ENTER THE EXCLUSION AREA.

C. AN EMERGENCY EYEWASH WILL BE LOCATED ON THE HOT ZONE SIDE OF THE CONTAMINATION REDUCTION ZONE.

D. WHERE PRACTICAL, ALL TOOLS SHALL BE SPARK PROOF, EXPLOSION RESISTANT AND/OR BONDED OR GROUNDED.

E. FIRE EXTINGUISHERS WILL BE ON SITE FOR EQUIPMENT AND SITE RELATED FIRES DURING ALL ACTIVITY PERIODS.

F. A FIRST AID KIT WILL BE PRESENT AT EACH WORK AREA AND WILL BE MADE VISIBLE TO ALL SITE PERSONNEL.

G. A MORNING SAFETY MEETING WILL BE HELD EACH WORK DAY TO REVIEW DECONTAMINATION PROCEDURES AND THE DAILY WORK ASSIGNMENTS.

X. HEAT STRESS MONITORING

DUE TO THE TIME OF YEAR, A HEAT STRESS MONITORING PROGRAM MAY BE NEEDED DURING WORKING HOURS. PERSONNEL WOULD BE SUBJECT TO THE FOLLOWING MONITORING PROGRAM:

FOR MONITORING THE BODY'S RECUPERATIVE ABILITY TO EXCESS HEAT, ONE OR MORE OF THE FOLLOWING TECHNIQUES WILL BE USED AS A SCREENING MECHANISM. MONITORING OF PERSONNEL WEARING IMPERVIOUS CLOTHING SHOULD COMMENCE WHEN THE AMBIENT TEMPERATURES EXCEED 85

DEGREES FAHRENHEIT, WORKERS SHOULD BE MONITORED FOR HEAT STRESS AFTER EVERY WORK PERIOD.

A. HEART RATE (HR) WILL BE MEASURED BY THE RADIAL PULSE FOR 30 SECONDS AS EARLY AS POSSIBLE IN THE RESTING PERIOD. THE HR AT THE BEGINNING OF THE REST PERIOD SHOULD NOT EXCEED 110 BEATS PER MINUTE. IF THE HR IS HIGHER, THE NEXT WORK PERIOD SHOULD BE SHORTENED BY 10 MINUTES (OR 33%), WHILE THE LENGTH OF THE REST PERIOD SHOULD STAY THE SAME. HOWEVER, IF THE ORAL TEMPERATURE EXCEEDS 99.7 DEGREES FAHRENHEIT AT THE BEGINNING OF THE NEXT PERIOD, THE FOLLOWING WORK CYCLE SHOULD BE FURTHER SHORTENED BY 33%. ORAL TEMPERATURE SHOULD BE MEASURED AGAIN AT THE END OF THE REST PERIOD TO MAKE SURE THAT IT HAS DROPPED BELOW 99 DEGREES FAHRENHEIT.

B. BODY WATER LOSS (BWL) DUE TO SWEATING WILL BE MEASURED BY WEIGHING THE WORKER IN THE MORNING AND IN THE EVENING. THE WORK CLOTHING SHOULD BE SIMILAR AT BOTH WEIGHINGS; IT IS PREFERABLE TO PERFORM THE WEIGHINGS WITH NUDE EMPLOYEES. THE SCALE SHOULD BE ACCURATE TO PLUS OR MINUS 1/4 POUNDS. WORKERS SHOULD BE INSTRUCTED TO INCREASE THEIR DAILY INTAKES OF FLUIDS BY THE WEIGHT LOST. IDEALLY, BODY FLUIDS SHOULD BE MAINTAINED AT A CONSTANT LEVEL DURING THE WORK DAY. THIS REQUIRES REPLACEMENT OF SALT LOST THROUGH PERSPIRATION AS WELL.

C. BLOOD PRESSURE WILL BE MONITORED BEFORE AND AFTER EACH WORK PERIOD.

D. GOOD HYGIENIC STANDARDS SHOULD BE MAINTAINED BY FREQUENT CHANGES OF CLOTHING AND DAILY SHOWERING. CLOTHING SHOULD BE PERMITTED TO DRY DURING REST PERIODS. PERSONS WHO NOTICE SKIN PROBLEMS SHOULD IMMEDIATELY CONSULT MEDICAL PERSONNEL. (NOTE: APPROPRIATE FIRST AID PROCEDURES FOR HEAT STRESS ARE PROVIDED IN APPENDIX A)

XI. COLD STRESS MONITORING

DUE TO THE ON-SITE TREATMENT PORTION OF THIS PROJECT OCCURING DURING THE COLD MONTHS OF THE YEAR, SMALL SPACE HEATERS WILL BE PLACED INSIDE THE BUILDING IN ORDER TO PREVENT HYPOTHERMIA DURING WORK HOURS. (NOTE: RECOGNITION, PREVENTION, AND TREATMENT OF HYPOTHERMIA IS PROVIDED IN APPENDIX A)

XII. IMPORTANT PHONE NUMBERS

	LOCATION	PHONE NUMBER
FIRE	CITY OF PHILA.	911
POLICE	CITY OF PHILA.	911
AMBULANCE	CITY OF PHILA.	911
HOSPITAL	GERMANTOWN HOSPITAL 1 PENN BLVD., PHILA.	(215) 951-8120

DIRECTIONS TO HOSPITAL: FOLLOW BELFIELD AVE. WEST TO PENN ST. RIGHT ON PENN ST. TO HOSPITAL AT 1 PENN ST.

XIII. ADDITIONAL EMERGENCY PHONE CONTACTS - SEE ATTACHED LIST

PREPARED BY: K. Barry, <i>Tate Chodura</i>	DATE: 4/20/87
REVIEWED BY:	DATE:
APPROVED BY: <i>James H. Gai</i>	DATE: 8/27/87

ATTACHMENT 1

BELLFIELD AVENUE SITE
SITE CONTACTS

Bob Vernon, Property and business owner
Hauges Mill
Ambler, PA 19002
215-646-4714 Home
215-843-6487 Work

John Vernon, Plant Manager
Mt. Airy
Philadelphia, PA
215-844-7987 Days

Geoffrey W. Veith, Attorney to Mr. Vernon
Hecker, Rainer, and Brown
717 Two Penn Center Plaza
15th Street & JFK
Philadelphia, PA 19102
212-665-0400

U.S. Environmental Protection Agency
Philip Younis, On-Scene Coordinator
215-597-9800

Roy F. Weston Inc., Technical Assistance Team (TAT)
Stephanie Morris
Kevin Scott
53 Haddonfield Road
Cherry Hill, NJ 08002
609-482-0222

City of Philadelphia License and Inspections
Robert F. Hoyt
1101 Market Street, Suite 600
Philadelphia, PA
215-592-6073

100084

Belfield Avenue Site
Site Contacts
Page two

U.S Department of Labor, OSHA
John Barry
215-596-1201
James Woodburn
U.S. Customs House, Room 242
Philadelphia, PA 19106
215-597-4955

City of Philadelphia Fire Marshall
Earl Sheldon
215-592-5962

City Managing Directors Office
John Hadalski
215-686-7114

Pensylvannia Department of Environmental Resources (PADER)
Robert Allen
215-565-1687

100085

WESTON • SPER

53 Haddonfield Road, Cherry Hill, NJ 08002 • (609) 482-0222

TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-7367

MEMORANDUM

TO: Garrett Arai, OSC, U.S. EPA Region III PCS #1305
THRU: Rich Habrukowich, TATL, Region III *AK* TDD #8707-23
FROM: Todd Chocholaty, TATM, Region III *AK*
SUBJECT: Belfield Avenue Site Trip Report
Germantown, Philadelphia Co., Pennsylvania
DATE: July 27, 1987

Background

The Visual Packaging Company is a chemical repackaging and specialty chemical blender located at 5238 Belfield Ave. in Germantown, PA. The products packaged and blended at the facility include: hand soap, gasfinder, waterfinder, zinc oxide products, methanol blends, brake fluid, and isopropyl alcohol. Raw materials for the blending were stored in six (6) 1000 gallon tanks.

On July 14, 1987, the Visual Packaging Co. building was damaged by explosions followed by fire. The cause of the blast is currently under investigation. Effects of the blasts on the building included shattered glass, blown out brick and concrete walls, collapsed roof, and general fire damage to portions of the interior.

Assessment Activities

On July 14, 1987, 1015 hours, TATMs Kevin Scott, Jack Williams, and OSC Garrett Arai responded to the fire and explosion. The Philadelphia Fire Department (PFD) was on scene to suppress the fire. The PFD contacted the EPA Emergency Response Section (ERS) to request technical assistance at 0800 hours. The time of the explosions was given at 0550 hours.

Roy F. Weston, Inc.

SPILL PREVENTION & EMERGENCY RESPONSE DIVISION

In Association with ICF Technology Inc., C.C. Johnson & Associates, Inc., Resource Applications, Inc.,
Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.

100036

OSC Arai interviewed the owner and operator of Visual Packaging, Mr. Bob Vernon. Mr. Vernon indicated that the following products were produced in the plant: hand soap, gasfinder, waterfinder, zinc oxide products, methanol blends, brake fluid, and isopropyl alcohol. Mr. Vernon stated that six (6) 1000 gallon tanks, two (2) of which were full of methanol, were present in the plant. Mr. Vernon also indicated that a number of drums were located on the roof of the building, and that the contents were unknown.

OSC Arai also questioned the City of Philadelphia Fire Marshall Ulshafer about making an entry into the building to assess the situation. The Fire Marshall stated that a safe entry could be made on the morning of 7-15-87 at the earliest. TAT and EPA determined that they should return on 7-15 to perform a site assessment. TATMs Scott and Williams performed logbook and photodocumentation of the site activities.

At 0925 hours on 7-15-87, TATMs Kevin Scott, Jack Williams, and Todd Chocholaty arrived on scene to perform a site assessment. The building, which houses Visual Packaging and rented businesses, was observed to be extensively damaged by fire and explosion. Concrete walls and large window panels were blown out and shattered by the blast. At 0953 hours, a PFD team entered the building to assess the fire damage and remaining fire hazard. Tennants who rented workshop space from Mr. Vernon were present and awaiting word on when they would be able to enter the building to remove belongings. One tenant entered the building and retrieved cats from the rubble.

OSC Garrett Arai and Bill Steuteville from CERCIA Enforcement arrived on scene at 1040 hrs. The OSC held a meeting with Mr. Vernon and Mr. Steuteville to discuss the raw materials remaining in the building, and the drums of unknowns on the roof. Mr. Vernon stated his current condition of bankruptcy on both his business and the property. Mr. Vernon stated that he will take no responsibility for the drums of unknowns left on the roof by a previous tenant. He will, however, take responsibility for cleaning up what remains of his products and raw materials. Mr. Vernon had also arranged for 24 hour security for the building. The OSC requested an inventory of materials housed in the building which will be used to develop a consent agreement for cleanup.

At 1120 hours, OSC Arai and Mr. Steuteville entered the building accompanied by PFD. TAT provided EPA with an explosimeter and an HNU photolizer for the entry.

EPA exited the building at 1225 hours. The OSC noted the poor condition of the building, and reported finding the following contents:

100087

6 (six) 1000-gal. tanks which included:
3 tanks of Methyl t-Butyl Ether (MTBE) approx. 700 gal. each
1 (one) tank of isopropanol, approx. 600 gal.
1 (one) tank of mineral spirits, approx. 900 gal.
1 (one) empty tank
1 (one) 7000-gallon underground tank of Methanol
1 (one) 1-gallon can of Tetrahydrofuran (THF)
A pallet of glue reported to contain Toluene
Many drums, some damaged, some oils, unknowns

TATMs Scott and Williams entered the building to perform TAT assessment at 1240 hours.

TAT exited the building at 1330 hours and reported the following contents:

Diethylene Glycol (brake fluid)
Sodium Silicate
Adhesive (Unspecified composition)
Cement Rubber (Unspecified composition)
Silicone (Unspecified composition)
Magic Lux Latex
Silco White Lithium No.2

Following a discussion with TAT, OSC and Mr. Steuteville discussed future plans with Mr. Vernon. Enforcement stated that Mr. Vernon should only provide site security until a cleanup plan can be drafted and approved by Enforcement.

The OSC stated that Mr. Steuteville may oversee site security and operation by Mr. Vernon. The OSC will not step in unless Mr. Vernon fails to comply with EPA Enforcement.

In a final meeting with the property owner, Mr. Vernon stated that he had obtained 24 hour site security as of 1700 hours on July 15, 1987.

The Fire Marshall, OSC, and TAT met to discuss the remaining concerns about site safety and possible causes of the blaze. PFD stated that they suspect arson as a cause, but that they are still investigating.

As a final measure, EPA secured the site with caution banner. TAT and EPA departed the scene at 1630 hrs.

On July 23, 1987, a meeting was called by EPA Enforcement to evaluate the cleanup plan submitted by Mr. Vernon. In attendance were the following agencies: Pennsylvania Department of Environmental Resources (PA DER), U.S. Department of Labor (OSHA), City of Philadelphia Department of Licenses and Inspections (L+I), PFD, and the City Managing Directors Office. It was determined that an OSHA assessment of the facility was needed before the plan could be evaluated. The Department of Licenses and Inspections stated that they had declared the building Imminently Dangerous (ID) on July 22. OSHA, EPA Enforcement, and TAT would perform a site assessment on the morning of July 24, 1987.

On July 24, 1987 EPA Enforcement, OSHA, and TAT made an assessment of the building. TAT made a level "B" entry to monitor air quality with an Organic Vapor Analyzer. The following conditions were reported:

One (1) drum measured 700 units within one (1) foot of an open bung. An area containing numerous five (5) gallon cans labeled "Flammable Liquid" measured 20-30 units. Background readings within the building were from 0-1 unit.

Based on these findings, EPA Enforcement directed Mr. Vernon to replace the bung in the high reading drum. Mr. Vernon complied with the EPA request.

It was determined by OSHA that the work plan submitted by Mr. Vernon could begin when Mr. Vernon implemented the following changes:

1. The RP must stabilize portions of an unstable building facade.
2. The workers should secure unstable cartons in the work area.
3. Mr. Vernon should demark and secure approved work areas.
4. All aiseways within work area must be cleared.
5. All removed product or debris must be labeled and shipped accordingly.

Belfield Avenue Site Trip Report
July 27, 1987
Page Five

EPA Enforcement has been provided with Materials Safety Data Sheets (MSDS) for all Visual Packaging Co. products.

Mr. Vernon signed the EPA Enforcement consent agreement on July 23, 1987.

Future Plans

EPA Enforcement will investigate potentially responsible parties (PRPs) and will negotiate regarding the work to be performed. Enforcement will attempt to contact the party who abandoned the drums of unknowns by way of an enforcement letter.

The OSC will pursue action on the abandoned drums which the PRP would not take responsibility for.

Mr. Vernon will begin work on the site within the guidelines of his work plan and the EPA Enforcement agreement.

Additional site photographs will follow.

Attachments:

Site Map
Area Map
Names of Site Contacts
POLREPs
Enforcement Letter Sent to Mr. Vernon (RP)
Draft EPA Enforcement Agreement
Work Plan Submitted by Responsible Party
Site Photographs

100090



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

Robert H. Vernon, Pres.
Visual Packaging, Inc.
5236 Belfield Ave.
Philadelphia, PA 19144

BY HAND

JUL 21 1987

Re: CERCLA Enforcement Consent Agreement and Order;
Belfield Avenue Site.

Dear Mr. Vernon:

Enclosed please find a prototype Consent Agreement and Order, for the Belfield Avenue Site. This has been prepared for you by EPA's CERCLA Removal Enforcement Section in order to familiarize you with the enforcement process and to enable you to begin developing a Work Plan for the Site.

This document does not represent the position of EPA and is not provided for negotiation purposes. A working draft is currently being prepared by EPA. When this draft has received the appropriate internal EPA review this will be provided to you for your response and comment. The final document may be similar to this prototype, but it may contain substantial changes.

I understand, based on verbal agreements with you, that you are providing for twenty-four hour a day security at the Site and that you are not handling any chemicals or products pending approval by EPA.

If you have any questions please contact me at (215) 597-6678.

Sincerely,

Bill Steuteville, Environmental Scientist
CERCLA Removal Enforcement Section

cc: Geoffrey Veith, Esq.
Don Becker, PADER

100091-

BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building

Philadelphia, Pennsylvania 19107

DRAFT

IN THE MATTER OF:

Belfield Avenue Site
Philadelphia, Pennsylvania

Robert H. Vernon

RESPONDENT

Docket No. _____

Proceeding Under Section 106(a)
of the Comprehensive Environ-
mental Response, Compensation,
and Liability Act of 1980,
42 U.S.C. § 9606 (a),
as amended by the Superfund
Amendments and Reauthorization
Act of 1986, Pub. L. No. 99-499,
100 Stat. 1613 (1986).

CONSENT AGREEMENT AND ORDER

This Consent Agreement and Order is made and entered into between the United States Environmental Protection Agency ("EPA") and Robert H. Vernon ("Respondent") pursuant to the authority vested in the President of the United States of America by Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. § 9606(a), as amended by the Superfund Amendments and Reauthorization Act of 1986 ("SARA"), Pub. L. No. 99-499, 100 Stat. 1613 (1986), and delegated to the Administrator of EPA on January 23, 1987, by Executive Order 12580, 52 Fed. Reg. 2923, and further delegated to the Regional Administrators. This Consent Agreement and Order

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pertains to property located at 5236 to 5250 Belfield Avenue, Philadelphia, Pennsylvania described in the attached copy of the deed (Attachment A). The property will hereinafter be referred to as the "Site".

The actions taken pursuant to this Consent Agreement and Order shall be consistent with the National Oil and Hazardous Substance Contingency Plan, 40 C.F.R. § 300.65 ("NCP"). Notice of the issuance of this Consent Agreement and Order has been given to the Commonwealth of Pennsylvania.

EPA and the Respondent agree that settlement of this matter and entry into this Consent Agreement and Order are made in good faith in an effort to resolve concerns raised by the United States concerning the release or threatened release of a hazardous substance from the Site.

I. EPA FINDINGS OF FACT AND CONCLUSIONS OF LAW

1. The Respondent is the owner of the Site through various corporate entities. The Site consists of a multi-story building on approximately one (1) acre of land bounded on two sides by private property, on the front by Belfield Avenue, and on the back by the SEPTA's Chestnut Hill East commuter rail line.

2. The Respondent is the owner of Visual Packaging, Inc. (VPI). VPI is in the business of mixing, packaging and wholesaling windshield cleaners, gasoline additives, fluids and other products. VPI occupies portions of the Site.

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3. Other portions of the Site are occupied by other commercial businesses including a rug designer, a furniture refinishing and repair business, Tangible Concepts, Inc., B & F, Inc. and a musical group.

4. On July 14, 1987, a fire and numerous explosions occurred at the Site. The Philadelphia Fire Department ("PFD") responded, contained, and extinguished the fire. The fire caused extensive damage to all floors and the roof of the building at the south end. One occupant of the building was in the building at the time of the fire and escaped after the initial explosion. The PFD has found evidence which indicates that the fire(s) was started by vandals/arsonists.

5. The EPA Region III Emergency Response Section received a request from the PFD to evaluate the site on July 14, 1987, during the fire. A preliminary assessment was conducted by EPA's On-Scene Coordinator (OSC) on July 15, 1987, with the assistance of the CERCLA Removal Enforcement Project Officer, the Office of the Philadelphia Fire Marshall ("PFM"), and EPA's Technical Assistance Team ("TAT"). They visually inspected the Site, and numerous vessels on the site, to determine and identify the materials present at the site, and ascertain the condition of the materials and vessels. Air monitoring for organic vapors was also conducted during the inspection.

6. The Chief of the PFM determined that the site presents a fire and explosion threat and so informed EPA on July 15, 1987.

7. The Philadelphia Department of Licenses and Inspections ("LI") determined that the building is structurally unsound due to fire damage.

8. During the preliminary assessment conducted by EPA, numerous vessels containing tentatively identified and unidentified materials were found. Many of the vessels were overturned, damaged, "pillowed", breached, leaking and/or emptied of material. Because of these conditions, the Site was determined to be unstable.

9. Air monitoring on July 15 by EPA using an "Hnu" photo ionizer, organic vapor meter and explosion meter showed levels of organic vapors in areas of the building ranging from 5 ppm to 100 ppm. Ambient levels throughout much of the building were found to range from 5 ppm to 15 ppm. No explosive levels were found during the assessment.

10. EPA conducted interviews at the Site on July 15, 1987, with Respondent, and his son, John T. Vernon, Manager of VPI. During these interviews, EPA was informed that the following materials and products were kept at the Site: methyl alcohol, isopropyl alcohol, mineral spirits, Methyl tert-butyl ether, solvents, dyes, paints, soaps, detergents, windshield cleaners, gasoline additives, power steering fluid, and petroleum products. In addition, numerous drums and vessels containing unidentified substances were stored on Site. These substances were tentatively identified by Respondent to contain; epoxy resins, paints, solvents, petroleum products and other materials. The unidentified materials had been left at the Site by previous tenants.

11. The Respondent has stated that numerous attempts have been made in the past to contact the owner(s) of the unidentified materials to identify and remove the materials.

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12. The known materials described above were used by Respondent to mix various products, which was the business of VPI. The label on the windshield cleaner indicates that it is flammable and contains methyl alcohol. The label on the gasoline antifreeze indicates that it is flammable and contains methyl alcohol. The label on the power steering fluid indicates that it is combustible and contains petroleum distillates.

13. Many of the materials described in paragraphs 10, 11, and 12 above are "hazardous substances" as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).

14. Through information provided by Respondent regarding the identity of materials, the location of vessels, and amount of materials previously known to be in the vessels, EPA was able to confirm that hazardous substances, had been released, or burned and/or were continuing to be released from the vessels. Materials that were released during the fire that were not burned are assumed to have been carried into the storm sewer system by water used to fight the fire.

15. Due to the fire and explosion threat as determined by PFN, the structural instability of the building as determined by LI, the unstable condition of vessels and the continued leaking of materials as observed by EPA, a release and/or threatened release of hazardous substances exists at the Site.

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16. The Site is located within ten (10) feet of a Commuter rail station, a public road, a business parking lot and a commercial business; within one hundred (100) feet of other commercial businesses; and within one thousand (1000) feet of numerous businesses and residential properties. Thousands of people pass within ten to one hundred (10 to 100) feet of the Site per day.

17. Methyl alcohol, methyl tert-butyl ether, mineral spirits and isopropyl alcohol are toxic substances. Inhalation or ingestion of methyl alcohol can cause blindness. Inhalation or ingestion of isopropyl alcohol can cause kidney damage. Ingestion of Mineral spirits can cause central nervous system damage.

18. The Site is a "facility" as defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

19. The Respondent is a "person" within the meaning of Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

20. The presence of hazardous substances at, and the actual and/or potential migration of hazardous substances from, the Site constitutes an actual and/or threatened "release" as defined in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).

21. The Respondent is a responsible party pursuant to Section 107(a) of CERCLA, 42 U.S.C. § 9607(a) and is, therefore, liable for carrying out the provisions of this Consent Agreement and Order.

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II. EPA DETERMINATION

22. An imminent and substantial endangerment to the public health, welfare, or the environment may be present as a result of the release or threat of release of hazardous substances from the Site.

23. EPA has determined that the actions set forth below are necessary to protect public health and welfare and the environment.

III. RESPONDENT'S DISCLAIMER

24. The Respondent does not admit to the truth of the findings described above or agree with the determinations made herein. It reserves and retains its rights to controvert them in any subsequent proceedings, other than proceedings commenced by EPA to enforce this Order. Respondent acting in good faith to protect the public health and the environment agrees to comply with the terms and conditions of this Order and to take all actions required of it by this Order.

IV. PARTIES BOUND

25. This Consent Agreement and Order shall apply to and be binding upon the Respondent, its agents, successors, and assigns, and upon all persons, contractors and consultants acting under or for the Respondent. No change in ownership nor corporate or partnership status relating to the site will in any way alter the status of the Respondent or its responsibility under this Consent Agreement and Order.

26. In the event of any change in ownership or control of the Site, Respondent shall notify the EPA in writing in advance of such change and shall provide a copy of this Consent Agreement and Order to the transferee in interest of the Site.

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27. The Respondent shall provide a copy of this Consent Agreement and Order to all contractors, sub-contractors, laboratories and consultants retained to conduct any portion of the work performed pursuant to this Consent Agreement and Order.

V. WORK TO BE PERFORMED

28. The Respondent shall provide EPA with a Work Plan ("WP") for the following:

1. Twenty four hour (24) a day security of the Site.
2. Removal from the Site of all materials and products owned or used by the Respondent in the regular conduct of Respondents business that is salable, usable, reusable or recyclable as product. The Respondent shall provide to EPA, all information, including but not limited to, bills of lading and sale, delivery orders, receipts and/or manifests to verify the proper dispersal of all such materials as usable product and the parties to whom it was delivered.
3. Identification, mapping and labeling, to the extent practicable, all materials, product or wastes on the Site.
4. Identification of owners of materials or products on Site that are not owned by the Respondent.
5. A Site safety plan to be followed during the course of work conducted pursuant to this Consent Agreement and Order or modifications thereto. The safety plan shall meet all applicable OSHA regulations.

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29. The Respondent shall not dispose of any materials except as specified in the WP, or allow others to dispose of materials which are, or may be hazardous substances, or to dispose of unidentified materials without the prior consent of EPA. In any event, the disposal of such materials shall be conducted in accordance with all Federal, state or local Laws and Regulations.

30. Respondent shall implement the tasks detailed in the Work Plan in accordance with the standards, specifications and schedules set forth herein.

31. Within 48 hours of the effective date of this Consent Agreement and Order, the Respondent shall commence implementation of the Work Plan. The Respondent has been providing Site security since July 16, 1987, and will continue to provide Site security twenty-four hours a day.

32. The actions required in the WP shall be completed within fourteen (14) days of the effective date of this Consent Agreement and Order.

33. In the event that Respondent fails or refuses to comply with the terms of this Consent Agreement and Order, as determined by EPA, EPA may undertake such measures in lieu of Respondent, and take any other measures which EPA determines may be necessary to protect public health, welfare or the environment and may subsequently seek reimbursement of its costs.

VI. ACCESS

34. Respondent shall permit EPA, its employees, agents, contractors, or other authorized persons to have access to the Respondent's property, as provided below, for any of the following reasons:

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a. to enter and freely move about those portions of the Respondent's property where work has been or is being conducted by the Respondent pursuant to this Consent Agreement and Order, at all reasonable times, including, but not limited to, any time that work is being carried out pursuant to this Consent Agreement and Order, for the purpose of observing the implementation of activities undertaken in accordance with this Consent Agreement and Order;

b. to perform actions EPA determines are necessary under Paragraph 41;

c. to obtain representative and/or split samples for hazardous substances testing and evaluation; and

d. to perform necessary actions should Respondent not perform such actions.

These rights of access are in addition to, and not in substitution for, EPA's inspection authority under applicable law.

VII. DOCUMENTATION

35. Documents, including reports, sampling results and other correspondence to be submitted pursuant to this Consent Agreement and Order shall be hand delivered or sent certified or express mail to the Project Coordinator.

36. The Respondent shall provide a copy of this Consent Agreement and Order to contractors, subcontractors, laboratories, and consultants retained to conduct any portion of the work performed pursuant to this Consent Agreement and Order within two days of the effective date of such retention.

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37. Any reports, plans, specifications, schedules, and attachments required by this Consent Agreement and Order and approved by EPA are incorporated into this Consent Agreement and Order. Any noncompliance with such EPA approved reports, plans, specifications, schedules, and attachments shall be considered a failure to achieve the requirements of this Consent Agreement and Order. Determinations of non-compliance shall be made by EPA.

VIII. DESIGNATED PROJECT COORDINATOR

38. On or before the effective date of this Order the Respondent shall designate a Project Coordinator ("PC"). The Project Coordinator for EPA shall be:

William D. Steuteville (3HW14)
USEPA Region III
841 Chestnut Bldg.
Philadelphia, PA 19107

Each PC shall be responsible for overseeing the implementation of this Consent Agreement and Order. To the maximum extent possible, communications between Respondent and EPA shall be directed through the PCs. EPA and Respondent each has the right to change its respective PC. Such a change can be accomplished by notifying the other party in writing at least five (5) calendar days prior to the change.

During the course of Respondents actions taken pursuant to this Order, the EPA PC shall have the authority to halt, modify, conduct, or direct any tasks required by this Consent Agreement and Order or portions thereof, or to take any response actions necessary if there is a threat to the public health, welfare or the environment as described in 40 C.F.R. § 300.65. The EPA PC shall have the authority to approve

100102

minor modifications to the Work Plan that may become necessary as the work progresses. Absence of the EPA PC from the Site shall not be cause for stoppage of work.

IX. FORCE MAJEURE

39. The Respondent shall notify EPA of any delay or anticipated delay in achieving compliance with the requirements of this Consent Agreement and Order. Said notification shall be made verbally as soon as possible but not later than forty-eight (48) hours after Respondent becomes aware of such delay or anticipated delay, and in writing not later than three (3) calendar days after becoming aware of such delay. The written notification shall state: (1) the nature of the delay; (2) whether and the reason why the delay is beyond the control of the Respondent; (3) the action that will be taken to mitigate, prevent or minimize further delay; (4) the anticipated length of the delay; and (5) a timetable for the action to mitigate, prevent or minimize the delay. The Respondent shall adopt all reasonable measures to avoid or minimize any such delay.

Any delay that results from circumstances beyond the control of the Respondent that cannot be overcome by due diligence shall not be deemed to be a violation of the Respondent's obligations under this Consent Agreement and Order; nor shall it make the Respondent liable for the stipulated penalties contained in Section XI of this Consent Agreement and Order. To the extent a delay is caused by circumstances beyond the control of the Respondent, the schedule affected by the delay shall be modified to account for the delay resulting from such circumstances.

100103

Increased costs of performance or changed economic circumstances shall not be considered circumstances beyond the control of the Respondent.

The Respondent shall have the burden of proving that a delay was caused by circumstances beyond its control, and that the Respondent took all reasonable measures to avoid or minimize delay.

Failure of the Respondent to comply with the notice requirements of this paragraph shall render this paragraph void and constitute a waiver of the Respondents right to invoke the benefits of this section.

X. RESERVATION OF RIGHTS

40. Except as expressly provided in this Consent Agreement and Order, (1) each party reserves all rights and defenses it may have, including any right to contribution possessed by the Respondent against any other other parties who may be responsible for actual or threatened releases of a hazardous substance at the site, and (2) nothing herein shall prevent EPA from seeking legal or equitable relief to enforce the terms of this this Order, including the right to seek injunctive relief, imposition of statutory fines, and/or punitive damages.

41. EPA reserves the right to take actions outside the terms of this Consent Agreement and Order and actions in addition to those specified in this Consent Agreement and Order, and to seek to recover the costs of such actions from Respondent.

XI. WAIVER

42. The Respondent hereby waives any rights it may have under Section 106(b) of CERCLA, as amended by SARA.

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XII. STIPULATED PENALTIES

43. If Respondent fails to perform any work or submit any reports as set forth in the Work Plan, in accordance with the schedule contained therein, Respondent shall pay into the Hazardous Substances Superfund, within five (5) calendar days of demand, the sums set forth below as stipulated penalties. Checks shall be made payable to the Hazardous Wastes Superfund and should be mailed to:

EPA - Superfund
P.O. Box 371003 M
Pittsburgh, PA 15251

Stipulated penalties shall accrue in the amount of \$100 the first week and \$500 for each week thereafter. The stipulated penalties set forth in this section do not preclude EPA from electing to pursue any other remedies or sanctions which may be available to them by reason of the Respondent's failure to comply with any of the requirements of this Consent Order.

XIII. OTHER APPLICABLE LAWS

44. All actions taken under this Consent Agreement and Order shall be accomplished in a manner which complies with the requirements of all applicable local, State, and Federal laws and regulations.

XIV. EFFECTIVE DATE AND SUBSEQUENT MODIFICATION

45. The effective date of this Consent Agreement and Order shall be the date on which it is signed by EPA. EPA shall provide the Respondent with immediate notice that the Order has been signed. This Consent Agreement and Order may be amended by mutual agreement of EPA and Respondent. Such amendments shall be in writing and shall become effective on the date on which such amendments are signed by EPA.

100105

46. No informal advice, guidance, suggestions or comments by EPA regarding reports, plans, specifications, schedules and other writings submitted by Respondent may be construed as relieving Respondent of its obligation to obtain formal approval when required by this Consent Agreement and Order.

XV. TERMINATION AND SATISFACTION

47. The provisions of this order shall be deemed satisfied upon Respondent's receipt of written notice from EPA that it has demonstrated, to the satisfaction of EPA, that all of the terms of this Order have been completed.

IT IS SO AGREED AND ORDERED:

United States Environmental Protection
Agency

Date: _____

By: _____
James M. Seif
Regional Administrator
EPA, Region III

Date: _____

By: _____
Robert H. Vernon

100106

SITE WORK PLAN

REMOVAL OF PACKAGING SUPPLIES AND FINISHED HOUSEHOLD GOODS
FROM FIRE SITE AT 5136 BELFIELD AVE, PHILADELPHIA PENNA.

SITE DESCRIPTION:

A 38000 square foot floor of a building at 5236 Belfield Ave that has been the scene of a fire set by arsonists. The floor is divided into five areas. Fronting on Belfield ave is an inside truck dock (undamaged by fire) an 8000 square foot room the east end of which was damaged slightly by fire and about 1000 square feet of roof with fire damage, and a corner room 3000 square feet that did not receive fire damage.

This entire section is over a basement. The north east corner room in the basement is believed to be the location of the first set of fires accomplished by the arsonist.

The basement corner room contained band instruments set up for band practice. The arsonist arranged the fire in such a way to cause an explosion of sufficient force to throw the 18 inch stone wall over into Belfield ave and to blow out all the windows. When the stone wall blew out, the support for the windows in the floor above was removed and those windows then fell into the street.

Work site no. 1 is the corner room (see the site plan) that was not burned by the fire, but did lose its windows when the walls were blown out on the floor below.

Site no. 1 was used for the storage of packaging supplies (see the inventory list attached) these supplies are largely cardboard cartons and empty plastic bottles.

SITE NO II

100107

SITE NO II

Area no II is the storage area for finished goods ready for shipment. 28 pallets of material were ready for shipment at the time of the fire. The materials are packaged in wet cartons but the contents are in salable condition. (see inventory attached) Some of the bottles were in the fire hose stream which removed some of the labels.

OBJECTIVES:

All of the finished goods are household items that contain Methanol. The finished goods must be inspected, unclear labels, removed and all bottles labelled clearly before proceeding to market in their normal manner. These material belong to Unifide Inc. They have a facility in Newton N.J. that can effectively inspect and repackage these materials. The objective of this work is to load the finished goods on a trailer truck for shipment to Newton New Jersey.

This work is to be done as soon as possible to minimize the possibility for any one being exposed to any containers of unlabeled product.

The packaging supplies in the corner room are sitting on a reinforced concrete floor with no walls. They hang close to the edge of the floor. Walking traffic can with little effort reach up to these materials. It is the opinion of management that a huge fire was set with considerable effort after breaking into the building. In the present circumstance a considerable fire could be set without the trouble of entering the building. The scope of work is to remove these packaging supplies that are owned by Unifide Inc. They are to be loaded on trailer trucks that will convey them to the Unifide Warehouse in Kearny N.J. The work should be done as quickly as possible to avoid the possibility of additional fire.

Site Security:

Watchmen are on the premises 24 hours each day. The 45000 square foot building faces 200 running feet of the Chestnut Hill railroad line. The tracks are approximately the same level as the roof. The building has a history severe vandalism because the building can be approached unseen from the railroad, the roof can be crossed, windows broken and the building entered, ~~by the actions of these~~

The primary concern of the watchmen is to keep neighborhood vandals from entering the premises across the railroad. The corner room is public and well lighted and is rated second in importance in keeping people out of the building.

PROJECT REPORT PROCEEDURE

All material to be moved is listed in the inventory attached. All material will be counted as it enters the truck and signed bills of lading received to document what was removed and its destination.

All material will be loaded on secured pallets and loaded on the truck with a fork truck. The personnel will be the shipping personnel from Visual Packaging who have a minimum of 10 years experience handling both the fork truck and these kinds of household products.

Hazzard analysis:

Site I: Packaging supplies are not hazzardous.

The packaging supplies could be set fire in a split second by vandals and should be removed as quickly as possible.

SITE II: The 22 pallets of Gas Line Anti Freeze are a household item in every food store, auto after market store and many homes throughout the United States. All of these items are labeled so that the public is warned that the material should not be taken internally nor stored near fire or flame because it is flammable. Some of the finished goods are unclearly labeled. If these bottles are stolen by vandals the absence of adequate warning labeling could cause serious harm. The bottles must be removed to a place where they can be inspected and properly labelled as soon as possible.

Handling hazzard: There is no handling hazzard.

Spills : Should a case of material fall bottles can

SCOPE OF WORK

Belfield Avenue Site
Philadelphia, Philadelphia Co. PA

Prepared by: USEPA Technical Assistance Team

Background:

The Visual Packaging Company was a chemical repackaging and specialty chemical blender located at 5238 Belfield Avenue, Philadelphia, Pennsylvania. The facility consisted of a large, three story building of approximately 120,000 square feet. The building housed Visual Packaging and several small businesses. The small businesses were involved in light manufacturing of rugs, furniture, and other wood products. The products packaged and blended at Visual Packaging included: hand soap, gasfinder, waterfinder, zinc oxide products, methanol blends, brake fluid, and isopropyl alcohol. Raw materials for the blending were stored in six (6) 1000 gallon tanks located in the Visual Packaging work area and in one 7000 gallon underground tank.

The area surrounding the site is residential in nature, with automobile dealerships located along one side of the building and across the street from the facility. A SEPTA train station is located directly behind the facility. The nearest residence is approximately one block from the facility.

On July 14, 1987, the Visual Packaging Co. building was damaged by explosions followed by fire. Effects of the blasts on the building included shattered glass, blown out brick and concrete walls, collapsed roof, and general fire damage to portions of the interior and stored materials. At the request of the Philadelphia Fire Department (PFD), EPA, accompanied by Technical Assistance Team Staff, responded to the emergency to assist PFD officials due to the presence of hazardous materials.

On July 15, 1987, USEPA ERS, CERCLA Removal Enforcement Section, and TAT arrived on scene to perform a site assessment.

The following hazardous materials were observed in the building:

- 6 (six) 1000-gal. tanks which included:
 - 3 tanks of Methyl t-Butyl Ether, (Flashpoint: -30 deg.F) approx. 700 gal. each.
 - 1 (one) tank of isopropanol, approx. 600 gal.
 - 1 (one) tank of mineral spirits, approx. 900 gal.
 - 1 (one) tank containing residue of an unknown substance
- 1 (one) 7000-gallon underground tank of Methanol (flashpoint of 50 degrees Farenheit)
- 1 (one) 1-gallon can of Tetrahydrofuran (potential shock

sensitive and highly toxic material)
1 (one) five gallon can Aroclor 1242 (PCB)
500 cases of manufactured product reported to contain Toluene
Diethylene Glycol
Sodium Silicate
Adhesive (Unspecified composition)
Cement Rubber (Unspecified composition)
Silicone (Unspecified composition)
Magic Lux Latex
Silco White Lithium No.2

In addition to the highly flammable and toxic materials which were identified on the premises, approximately 300 55 gallon drums, and 100 miscellaneous containers containing unknown materials were found throughout the facility. Approximately three tons of lead based products were also observed.

Goals of Work:

- 1) Secure access to building and adjacent areas
- 2) Perform inventory of all materials on site
- 3) Segregate materials according to compatibilities
- 4) Sampling of all unknown materials on site
- 5) Put useable materials into product exchange
- 6) Proper ultimate disposal of all hazardous materials

Project Phases:

- 1) Secure access to building and adjacent storage lots.
- 2) Perform inventory of materials on site.
 - A) Drawings of each floor indicating location of containers.
 - B) List accompanying drawings providing:
 - 1) Container size and contents
 - 2) Type and volume of material in container
- 3) Segregate material according to compatibility
- 4) Sampling and analysis of unknown materials
- 5) Placing useable product on product exchange
- 6) Proper ultimate disposal of all hazardous materials.

NOTE: All operations performed on site will be required to adhere to the requirements set forth by the National Institute for Occupational Safety and Health (NIOSH) and the Occupational Safety and Health Administration (OSHA).

Some site specific requirements will be:

- 1) Self Contained Breathing Apparatus and proper protective clothing for the sampling and segregation operations.
- 2) A qualified Chemist will be needed for the determination of compatibility of materials during segregation.
- 3) Removal of collapsed roof areas which limit access to a number of drums, and which present a physical hazard to personnel.

Contractor Scope of Work

The ERCS contractor shall supply to the project:

- * one command post trailer
- * one decontamination trailer
- * one storage trailer for drum storage
- * two chemists
- * one project control technician
- * one response manager
- * recovery technicians (as required)
- * one foreman
- * one equipment operator

The ERCS contractor shall perform the following:

- * The contractor shall inventory, stage, sample, pack, and perform compatibility studies as needed to recycle or dispose of the hazardous substances on site in an environmentally safe manner.
- * The contractor shall overpack all drums/containers as needed for disposal purposes.
- * The contractor shall handle and dispose of any and all sensitive material.
- * The contractor shall provide all analytical data required to identify material for recycling and for disposal of all hazardous substances.
- * The contractor shall provide transportation and disposal for the hazardous materials on site and specifically investigate recycling options prior to seeking disposal alternatives.
- * The contractor shall post site warning signs.
- * The contractor shall provide 24-hour site security.

WORK PLAN FOR
BELFIELD AVENUE SITE
PHILADELPHIA, PA

SUBMITTED TO:
THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

NOVEMBER 30, 1988
PROJECT 5197-E

100113

1.0 SCOPE OF WORK

The Belfield Ave site requires the demobilization of all equipment not necessary to the securing of PCP contaminated materials on site. The Galson Treatment Equipment will be have to be disconnected and arrangements made for removal as soon as possible in order to allow access to the site for building/rebuilding a secure, fire proof vault for the storage of the PCP Materials. The area that the treatment tank occupies will have to be filled to grade and the concrete slab rebuilt.

The PCP materials will have to be overpacked, relabeled, and a final inventory made prior to storage.

All Non-PCP Hazardous waste left in remainder of the building will be brought to the staging area to be placed with the remainder of Non-PCP hazardous waste.

A thorough inspection of the building will be made to ensure that any hazardous material has not been overlooked. These materials will be bulked as soon proper analysis has been received by the OSC. At this time transportation and disposal arrangements will be made. After T & D of Non-PCP Hazardous waste has been completed and PCP Waste placed in a secure fire proof vault the personnel and equipment will be demobilized to await future disposal of PCP waste at a later date.

THE SCOPE OF WORK WILL BE AS FOLLOWS:

- * Mobilize equipment and personnel resources
- * Set up decontamination trailer
- * Establish work areas and set up transition zone
- * Demobilize all equipment on site not necessary to the scope of work
- * Repair area at treatment tank
- * Clear/Clean area inside of fenced security area
- * Arrange for return of all reagents and chemicals on site for treatment process
- * Overpack all PCP contaminated materials for storage
- * Rebuild and secure fire proof vault for PCP's
- * Stage in secure area all hazardous materials for bulking prior to T & D
- * Visual inspection of all areas for hazardous materials prior to leaving those areas
- * Bulk and segregate waste streams for disposal
- * Complete T & D on all Non-PCP Hazardous Waste
- * Secure Area
- * Demobilize personnel and equipment

100114

2.0 TECHNICAL APPROACH

Upon arrival of personnel and equipment at the site, OHM will meet with the OSC to set up work and transition zones. OHM will spot the decontamination trailer and parking zones OHM personnel.

2.1 DEMOBILIZATION OF PRESENT EQUIPMENT

Demobilization of equipment presently on the will begin. Treatment tank area will be restored per OSC directions.

2.2 OVERPACKING OF PCP MATERIALS

OHM personnel will begin overpacking of PCP contaminated materials. All overpacks will be labeled and inventoried in preparation for storage in a fire proof vault to be constructed at this point.

2.3 NON-PCP MATERIALS

OHM personnel will collect all Non-PCP hazardous waste from the building areas outside of the present secured area. This material will be taken to the secured area for segregation prior to bulking.

2.4 BULKING NON-PCP HAZARDOUS WASTE

Bulking of Non-PCP Hazardous Waste will be conducted according to waste streams and transported for disposal.

2.5 PCP CONTAMINATED MATERIALS

PCP contaminated materials will be placed in vault. The vault will then be sealed awaiting disposal in the future.

2.6 DEMOBILIZATION

When work is complete, OHM will secure the area, remove the equipment, personnel resources and demobilize from the site.

☒ HAZARDOUS
☐ NON-HAZARDOUS
☐ LIQUID
☒ SOLID



WASTE MANIFEST

FREEHOLD CARTAGE, INC.
 P.O. BOX 4629
 FREEHOLD, NJ 07728
 (201) 462-1001
 EPA ID# NJD054128164
 E 20281

U.S. EPA Region III

PHONE (INCLUDE AREA CODE)

EPA ID NO.

12121010101012121121

GENERATOR NAME - ADDRESS
Philadelphia PA

US DOT HAZARD CLASS

UN NUMBER FORM NET QUANTITY

MANIFEST NO. PA8 11643052

SHIPPER US DOT SHIPPING NAME	HAZARD CLASS	UN NUMBER	FORM	NET QUANTITY
1. EA waste Hazardous		1164	2	20 yd.
2. Solid, no	ORM-E			
3.				

N.J.D.E.P. #
 NJSWAS
 2265 21434
 GALS.

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION SHIPMENT OF A NON-HAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)

FCI REP LOADING	PROCEDURE	TIME	EQUIPMENT USED
WC-825C	Roll off		1-Roll off Truck
			1-Box High Load

24 HOUR CLOCK ONLY
 IN 0805
 OUT 0829
 TRACTOR
 TRAILER

GENERATOR'S CERTIFICATE: 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 the applicable regulations of the Department of Transportation, U.S. EPA and the State. The wastes described above were consigned to the Treatment, Storage or Disposal Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.

GENERATOR'S SIGNATURE - ALSO PRINT SIGNATURE

TITLE

DATE SHIPPED

TSD FACILITY - ALSO SIGN & PRINT REP.
 TSD FACILITY EPA ID NO.

TSD FACILITY EPA ID NO.
 MO. 12 DAY 17 YR. 87

DATE RECEIVED

MO. 12 DAY 17 YR. 87
 MO. 12 DAY 17 YR. 87



PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES
Bureau of Waste Management
P. O. Box 2063
Harrisburg, PA 17120

Form approved.
OMB No. 2050-0028
Expires 8-30-88

ER-SWM-51-REV. 6/87

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. P-A-P-O-O-0 00-2-2-4-2	Manifest Document No. 5-1-97-1	2. Page 1 of	Information in the shaded areas is not required by Federal law but is required by State law.
3. Generator's Name and Mailing Address U.S.E.P.A. Region III 261 Chestnut Bldg Philadelphia, PA 19107		4. Generator's Phone (215) 597-9328		A. State Manifest Document Number PAB 4643052	
5. Transporter 1 Company Name Freemold Garbage, Inc.		6. US EPA ID Number M-J-D-O-54-1-2-6-2-6-4		B. State Gen. ID Bellefield Ave. Germantown, NJ	
7. Transporter 2 Company Name		8. US EPA ID Number		C. State Trans. ID NJDEPS22657	
9. Designated Facility Name and Site Address Waste Conversion, Inc. 2009 Sandstone Drive Murfleld, PA 19440		10. US EPA ID Number P-A-P-O-85-6-9-0-5-9-2		D. Transporter's Phone (204) 402-1001	
				E. State Trans. ID PA-AH	
				F. Transporter's Phone ()	
				G. State Facility's ID Not Required	
				H. Facility's Phone (215) 642-3996	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. "Reg" 1-Waste, Hazardous substance, Solid, N.O.S.		0'0'1 C'M		Y	D' 0'0'8
b. ORM-E XA9188 (0008)					
c.					
d.					
J. Additional Descriptions for Materials Listed Above (Include physical state and hazard code) Haz. Code Physical State		K. Handling Codes for Wastes Listed Above			
a. 1 2 3 4 5 6 7 8 9 10		a. L c.			
b. 1 2 3 4 5 6 7 8 9 10		b. d.			
16. Special Handling Instructions and Additional Information Emergency contact: Jim Bates, O.H. Materials Corp., 609-443-2800 Lab Code #WC-8256					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name		Signature		Month Day Year	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
19. Discrepancy Indication Space 100117					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name		Signature		Month Day Year	

☒ HAZARDOUS
☐ NON-HAZARDOUS
☐ LIQUID
☒ SOLID



WASTE MANIFEST

FREEHOLD CARTAGE, INC.
 P.O. BOX 4629
 FREEHOLD, NJ 07728
 (201) 462-1001
 EPA ID# NJD054126184
 E 17095

100118

USEPA - Ryan III

GENERATOR NAME - ADDRESS <i>Freehold Cartage, Inc.</i>		PHONE (INCLUDE AREA CODE) <i>(201) 597-9325</i>		EPA ID NO. <i>19090909242424</i>	
PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN NUMBER	FORM	QUANTITY	MANIFEST NO.
1. <i>dry solid waste</i>	<i>001 - 6</i>	<i>9189</i>	<i>5</i>		<i>118-784-363</i>
2.					
3.					

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION SHIPMENT OF A NON-HAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)

LBS.	N.J.D.E.P. #
2265	<i>NJSW48</i>
GALS.	<i>2690</i>
24 HOUR CLOCK ONLY	
IN	TIME @ GENERATOR
OUT	<i>0830</i>
TRAILER	<i>#832</i>

EQUIPMENT USED

FCL REP LOADING	PROCEDURE	TIME	EQUIPMENT USED
<i>[Signature]</i>			

GENERATOR'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled in accordance with the applicable regulations of the Department of Transportation, U.S. EPA and the State. The wastes described above were consigned to the Transporter named. The Treatment, Storage or Disposal Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.

GENERATOR'S SIGNATURE - ALSO PRINT SIGNATURE

James M. Henry

TITLE

MO.

DATE SHIPPED

DATE RECEIVED

TSD FACILITY - ALSO SIGN & PRINT REP.

TSD FACILITY EPA ID NO.

19090909242424

MO. DATE RECEIVED

Waste Services



PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

Bureau of Waste Management

P. O. Box 2063

Harrisburg, PA 17120

Form # 610-02
OMB No. 2050-0028
Expires 9-30-88

ER-SWM-5 (REV. 6/87)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law but is required by State law.
3. Generator's Name and Mailing Address		U.S.E.P.A. Region III 841 Chestnut Bldg. Philadelphia, PA 19107		A. State Manifest Document Number PAB 4643063	
4. Generator's Phone (215) 597-9328		5. US EPA ID Number PA-00-000-02-2-4-215-1-9-7-2		B. State Gen. ID Bullfield Ave.	
6. Transporter 1 Company Name Freight Carriage, Inc.		7. US EPA ID Number PA-00-000-02-2-4-215-1-9-7-2		C. State Trans. ID NJDEMS2265	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (201) 462-1001	
9. Designated Facility Name and Site Address Waste Conversion, Inc. 2007 Sandstone Drive Hutfield, PA 19440		10. US EPA ID Number		E. State Trans. ID PA-AH	
		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		F. Transporter's Phone ()	
		12. Containers		G. State Facility's ID Not Required	
		13. Total Quantity		H. Facility's Phone (215) 822-0556	
		14. Unit (Wt/Vol)		15. Waste No.	
a. "X" 1-Waste, Hazardous Substance, Solid, N.O.S. OMH-E NA 9188 (D000)		0.0.1 C.H.		Y D. 0.0.6	
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above (Include physical state and hazard code)		K. Handling Codes for Wastes Listed Above			
a. Haz. Code Physical State		b. Haz. Code Physical State		c.	
d.				e.	
15. Special Handling Instructions and Additional Information		Emergency contact: Jim Bates, U.H. Material Corp. 609-443-2800 Lab Code #NC-8256			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. Or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name		Signature		Month Day Year	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
Printed/Typed Name		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		100119			
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 18.					
Printed/Typed Name		Signature		Month Day Year	

In case of an emergency or spill immediately call the National Response Center (800) 424-9302 and the PA DNR (717) 787-4343

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES
Bureau of Waste Management
P. O. Box 2063
Harrisburg, PA 17120

Form approved.
OMB No. 2010-0039
Expires 8-30-11

ER-SWM-31:REV. 6/87

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. P A P 00-0-0-0-2-2-4 25-1-9-7-4		2. Page 1 of 1 1	
3. Generator's Name and Mailing Address D.S.E.P.A. Region III 841 Chestnut Bldg. Philadelphia, PA 19107		A. Waste Manifest Document Number PAB 4643085			
4. Generator's Phone (215) 597-9328 5. Transporter 1 Company Name Freshford Cartage, Inc.		6. US EPA ID Number N F D 0 34-1-2-6-2-6-4		B. State Gen. ID Granttown, NJ C. State Trans. ID NJDEP52265/ PA-AH 011167	
7. Transporter 2 Company Name 8. US EPA ID Number		9. Designated Facility Name and Site Address Waste Conversion, Inc. 2669 Sandstone Drive Hatfield, PA 19440		D. Transporter's Phone (201) 462-1001 E. State Trans. ID PA-AH F. Transporter's Phone () G. State Facility's ID Not Required H. Facility's Phone (215) 822-0996	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. "AQ" 1-Waste, Hazardous Substance, Solid, H.O.S. ORN-E NA 9188 (D000)		12. Containers No. Type 0-0-1 C-1		13. Total Quantity 14. Unit 15. Waste No. Y D-0-0-8	
b. c. d.		12. Containers No. Type		13. Total Quantity 14. Unit 15. Waste No.	
J. Additional Descriptions for Materials Listed Above (Include physical state and hazard code) Haz. Code Physical State a. b.		K. Handling Codes for Wastes Listed Above Haz. Code Physical State a. b.		c. d.	
15. Special Handling Instructions and Additional Information 609-443-2800		Emergency contact: Jim Bates, U.H. Materials Corp. Lab Code #WC-8256			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to the which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name		Signature		Month Day Year	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space 100121					
Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name		Signature		Month Day Year	

PAB 4643085

☐ HAZARDOUS
☐ NON-HAZARDOUS
☒ LIQUID
☐ SOLID

FCI

FREEHOLD CARTAGE, INC.

P.O. BOX 4629
 FREEHOLD, NJ 07728
 (201) 462-1001

EPA ID# NJD054126164

E 20283

100122

WASTE MANIFEST

U.S. EPA Rec'd III
 GENERATOR NAME - ADDRESS Chilmark, PA PHONE (INCLUDE AREA CODE) 610 274 0000 EPA ID NO. PA121212121212

PROPER US DOT SHIPPING NAME	HAZARD CLASS	UN NUMBER	FORM	NET QUANTITY	MANIFEST NO.
1. <u>RC Waste Hazardous</u>	<u>06M-E</u>	<u>1498</u>	<u>2</u>	<u>2048</u>	<u>N.J.D.E.P. # NJSWAS 2285 21451</u>
2. <u>Solid WASTE</u>					
3.					

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION SHIPMENT OF A NON-HAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)

24 HOUR CLOCK ONLY
 IN 1570
 TIME @ GENERATOR
 OUT 1525

WC-825C

FCI REP. CODING

EQUIPMENT USED

1-2011-15-Trade 1-2011-15-Trade

PROCEDURE

TIME

1-2011-15-Trade 1-2011-15-Trade

GENERATOR'S CERTIFICATION: The undersigned hereby certifies that the above named materials are properly classified, described, packaged, labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and will be transported in accordance with the applicable regulations of the Department of Transportation. The treatment, storage and disposal facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.

GENERATOR'S SIGNATURE - ALSO PRINT SIGNATURE

TITLE

DATE SHIPPED

John M. H. H. H.
John M. H. H. H.
 TSD FACILITY - ALSO SIGN & PRINT REP.

TSD FACILITY EPA ID NO.

DATE RECEIVED

PA12018151515151512

MO. 12 DAY 17 YR. 87

WASTE TRANSFER SLIP



PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

Bureau of Waste Management

P. O. Box 2063

Harrisburg, PA 17120

EP-SWM-5/REV. 6/87

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved.
OMB No. 2030-0020
Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. PA P 00-0-0-0-2-2-4-2-5-1-9-73	2. Page 1 of 1	Information in the shaded areas is not required by Federal law but is required by State law.
3. Generator's Name and Mailing Address U.S.R.P.A. Region III 841 Chestnut Bldg. Philadelphia, PA 19107		A. State Manifest Document Number PAB 4643074		
4. Generator's Phone (215) 597-9328		B. State Gen. ID CERANTOWN, NJ		
5. Transporter 1 Company Name Frederick Cartage, Inc.		6. US EPA ID Number NJ D 054-1-2-6-2-6-4	C. State Trans. ID PA-AH NJ00022405	
7. Transporter 2 Company Name		8. US EPA ID Number	D. Transporter's Phone (201) 467-1001	
9. Designated Facility Name and Site Address Waste Conversion, Inc. 2809 Sanduscone Drive Baltimore, PA 19440		10. US EPA ID Number PA D 08-5-6-4-0-9-9-2	E. State Trans. ID PA-AH	
		F. Transporter's Phone ()		G. State Facility's ID Not Required
		H. Facility's Phone (215) 322-8996		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type	13. Total Quantity	14. Unit Unit Wt/Vol
a. "RX" 1-Waste, Hazardous Substance, Solid, N.O.S. OMN-E HA 9188 (D008)		0-0-1 CM		Y D-0-0-0
b.				
c.				
d.				
J. Additional Descriptions for Materials Listed Above (Include physical state and hazard code)		K. Handling Codes for Wastes Listed Above		
Has. Code Physical State		Has. Code Physical State		
a. [] []		a. [] []		
b. [] []		b. [] []		
15. Special Handling Instructions and Additional Information 609-443-2800		Emergency contact: Jim Bates, O.H. Materials Corp. Lab Code /WC-8256		
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.				
Printed/Typed Name		Signature		Month Day Year
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year
19. Discrepancy Indication Space		100123		
Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.				
Printed/Typed Name		Signature		Month Day Year

EPA Form 8700-22 (Rev. 9-86) Previous editions are obsolete

☒ HAZARDOUS
☐ NON-HAZARDOUS
☐ LIQUID
☒ SOLID

FCI

WASTE MANIFEST

FREEHOLD CARTAGE, INC.
 P.O. BOX 4629
 FREEHOLD, NJ 07728
 (201) 462-1001
 EPA ID# NJD064128164
E 17099
 100124

USEPA Form III

GENERATOR NAME ADDRESS <i>Michaelson, R.A.</i>		PHONE (include area code) <i>(215) 349-4328</i>		EPA ID NO. <i>9012101212124</i>	
PROPER US DOT SHIPPING NAME		US DOT HAZARD CLASS	UN NUMBER	FORM	NET QUANTITY
1. <i>Thy. Solid waste</i>		<i>02H-C</i>	<i>7188</i>	<i>5</i>	
2.					
3.					
		LBS.	N.D.E.P. #		
		GALS.	NUSWAS		
			<i>2285 26140</i>		

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION SHIPMENT OF A NON-HAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)

WC# 8256

FOR REP LOADING <i>1/18</i>	PROCEDURE	TIME	EQUIPMENT USED <i>Blue pump.</i>
--------------------------------	-----------	------	-------------------------------------

GENERATOR'S CERTIFICATION. This is to certify that the above named materials are properly classified, described, packaged, marked and labeled in accordance with the applicable regulations of the Department of Transportation, U.S. EPA and the State. The wastes described above were consigned to the Treatment, Storage or Disposal Facility, can and will accept the shipment of hazardous waste, and has a valid permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.

GENERATOR'S SIGNATURE - ALSO PRINT SIGNATURE <i>JOAN M. HENRY</i>		TITLE <i>FHS</i>	DATE SHIPPED <i>MO. 12 DAY 18 YR. 87</i>
TSO FACILITY - ALSO SIGN & PRINT REP. <i>White Brown</i>		TSO FACILITY EPA ID NO. <i>LA910195161919192</i>	DATE RECEIVED <i>MO. DAY YR.</i>



PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES
Bureau of Waste Management
P. O. Box 2063
Harrisburg, PA 17120

Form approved
OMB No. 2050-0079
Expires 9-30-88

ER-WM-51 REV. 8/87

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. PA P 00.0.0.0.2.2.4 215.1.9.7.5	2. Page 1 of 1	Information in the shaded areas is not required by Federal law but is required by State law.													
3. Generator's Name and Mailing Address U.S.E.P.A. Region III 841 Chestnut Bldg. Philadelphia, PA 19107		4. Generator's Phone 215 597-9328		A. State Manifest Document Number PAB 4643096													
5. Transporter 1 Company Name Freshhold Cartage, Inc.		6. US EPA ID Number PA-D 054.1.2.6.2.6.4		B. State Gen. ID Baltimore Ave. Germantown, NJ													
7. Transporter 2 Company Name		8. US EPA ID Number		C. State Trans. ID NJDP2245													
9. Designated Facility Name and Site Address Waste Conversion, Inc. 2669 Sandstone Drive Hartfield, PA 19440		10. US EPA ID Number PA-D 08.5.6.9.0.5.9.2		D. Transporter's Phone (201) 462-1001													
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) a. "X" 1-Waste, Hazardous Substance, Solid, N.O.S. ORR-E MA 9188 (U008)		12. Containers No. Type 0-0-1 C-M		13. Total Quantity 14. Unit M/Vol Y D-0-0-0													
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code) a. <table border="1"><tr><td>Haz. Code</td><td>Physical State</td></tr><tr><td>1</td><td>S</td></tr></table>		Haz. Code	Physical State	1	S	K. Handling Codes for Wastes Listed Above a. <table border="1"><tr><td>Haz. Code</td><td>Physical State</td></tr><tr><td>1</td><td>S</td></tr></table>		Haz. Code	Physical State	1	S	b. <table border="1"><tr><td>Haz. Code</td><td>Physical State</td></tr><tr><td>1</td><td>S</td></tr></table>		Haz. Code	Physical State	1	S
Haz. Code	Physical State																
1	S																
Haz. Code	Physical State																
1	S																
Haz. Code	Physical State																
1	S																
15. Special Handling Instructions and Additional Information 609-443-2800		Emergency contact: Jim Matas, U.S. Materials Corp. Lab Code FWC-8256															
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.																	
Printed/Typed Name		Signature		Month Day Year													
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year													
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year													
19. Discrepancy Indication Space		100125															
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.																	
Printed/Typed Name		Signature		Month Day Year													

In case of an emergency or spill immediately call the National Response Center (800) 424-8802 and the PA DER (717) 787-4343

GENERATOR

TRANSPORTER

FAC

ITY

PAB 4643096



South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt.
2600 Bull Street, Columbia, SC 29201
Phone: (803) 734-5200
Emergency & Holidays: (803) 734-5424

"USE PRINT OR TYPE (Form designed for use on 12-pitch typewriter)

Form Approved, OMB No. 2050-0036 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No. P A F 0 0 0 0 0 2 2 4 3 9 9 9 9	Manifest Document No. 2	Page 1 of 1	Information in the shaded areas is not required by Federal law, but is by State law.				
3. Generator's Name and Mailing Address USRA Region 111 841 Chestnut Building Philadelphia, PA 19107		Attn: Phil Younis, OSC		A. State Manifest Document Number B. State Generator's ID # 228-8016024-47 C. Philadelphia, PA 19107					
4. Generator's Phone (215) 597-9328		6. U.S. EPA ID Number N J 0 9 5 4 1 2 6 1, 6, 4		D. State Manifest ID # (201) 862-1001					
5. Transporter 1 Company Name Freehold Cartage, Inc.		8. U.S. EPA ID Number		E. State Manifest ID #					
7. Transporter 2 Company Name		8. U.S. EPA ID Number		F. State Manifest ID #					
9. Designated Facility Name and Site Address GSX Services of South Carolina, Inc. Route 1, Box 255 Pinewood, SC 29125		10. U.S. EPA ID Number S C D 0 7 0 3 7, 5, 9, 8, 5		G. State Manifest ID #					
11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit (Wt/Vol)				
a. Non RCRA/TSCA DOT Regulated Solids		0, 0, 1	C, M	0, 0, 0, 3, 0	7, 7, 7, 7				
b.									
c.									
d.									
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Materials Listed Above							
a. P, W, 0, 3, 6, 1, 3, 4, 1, 0, 1		c. - - - - -							
b. - - - - -		d. - - - - -							
15. Special Handling Instructions and Additional Information W.O. # 95205 P.O. # J05197E-203,012 a. Crushed Drums and Protective Clothing		Emergency Contact: Basil C. Kollias, O.H. Materials Corp. (609) 987-0010							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and the laws of the State of South Carolina. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. If I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name PHILIP C. YOUNIS		Signature [Signature]		Month Day Year 06 09 89					
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name DME HORG		Signature [Signature]		Month Day Year 10 10 89					
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year 10 01 86					
19. Discrepancy Indication Space		a. 3880 lbs. c. - - - - - b. - - - - - lbs. d. - - - - - lbs.							
20. Facility Owner or Operator; Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name ANN WILSON						Signature [Signature]		Month Day Year 06 12 87	



STATE OF ARKANSAS
Department of Pollution Control and Ecology
P. O. Box 9583 Little Rock, Arkansas 72219
Telephone 501-582-7444

Please print or type. (Form designed for use on site (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address USEPA Region III 841 Chestnut Building Philadelphia, PA 19107 4. Generator's Phone 1 215 597-9328		Attn: Phil Younis, OSC		AR-398581		B. State Generator's ID 5238 Belfield ave. Philadelphia, PA 19144			
5. Transporter 1 Company Name Freehold Cartage, Inc.		6. US EPA ID Number NJ D 054126164		C. State Transporter's ID PC 944H 252		D. Transporter's Phone (201) 462-1001			
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID PC H		F. Transporter's Phone			
9. Designated Facility Name and Site Address ENSCO, Inc. American Oil Road El Dorado, Arkansas 71730-1957		10. US EPA ID Number IA R D 10161917141811912		G. State Facility's ID (501) 863-7173		H. Facility's Phone			
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type		13. Total Quantity		14. Unit Vol		1. Waste No.	
a. (RQ) Hazardous Substance Liquid, n.o.s., ORM-E, NA9188 (PCB)		1011 DIM		80050		P		PCB	
b. Waste Flammable Liquid, corrosive, n.o.s., Flammable Liquid, UN2924.		005 DIM		041100		P		D001, D002 F002	
c. Hazardous Waste Solid, n.o.s., ORM-E, NA9189.		0070 DIM		18800		P		D006, F002	
d. Waste Flammable Liquid, n.o.s., Flammable Liquid, UN1993.		0070 DIM		021700		P		D001, F002	
J. Additional Descriptions for Materials Listed Above a. Liquid/Toxic, RQ= 1 lb. c. Solid/Toxic b. Liquid/Flammable d. Liquid/Flammable		110-1499# 110-2316#		K. Handling Codes for Wastes Listed Above T03		EMERGENCY RESPONSE INFORMATION: Phil Younis			
If no alternate TSDF, return to generator 110-77# 110-619#				215-					
15. Special Handling Instructions and Additional Information a. ENSCO WMS # 107037 b. ENSCO WMS # 107038 c. ENSCO WMS # 107039 Load # 52803		Emergency Contact: Basil C. Kollias, O.H. Materials (609) 987-0010							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.		Printed/Typed Name Phil Younis		Signature [Signature]		Month Day Year 10/09/89			
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name William Breese		Signature [Signature]		Month Day Year 06/09/89					
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year					
19. Discrepancy Indication Space 11A 11B 11C 11D				100127					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Printed/Typed Name TEKIS		Signature [Signature]		Month Day Year 10/12/89					

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.



PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

Bureau of Waste Management

P. O. Box 2063

Harrisburg, PA 17120

Form approved.
OMB No. 2050-0028
Expires 9-30-88

ER-SWM-51-REV. 8/87

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. PA 0 0 0 0 0 2 3 4 9	Manifest Document No. 5 2 2 2 8 3	2. Page 1 of 1	Information in the shaded areas is not required by Federal law but is required by State law.	
3. Generator's Name and Mailing Address Powar Line Products 5236 Belfield Avenue Philadelphia, PA 19144		A. State Manifest Document Number PAB 4932583		B. State Gen. ID SAME		
4. Generator's Phone 215, 643-0629		5. US EPA ID Number PA 0 0 0 0 0 2 3 4 9		C. State Trans. ID PA-AH 0 0 3 2		
6. Transporter 1 Company Name Delaware Container Co., Inc.		7. US EPA ID Number PA 0 0 0 0 0 2 3 4 9		D. Transporter's Phone (215) 343-0600		
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Trans. ID PA-AH		
9. Designated Facility Name and Site Address Delaware Container Co., Inc. W. 11th Ave. & Valley Road Coatsville, PA 19320		10. US EPA ID Number PA 0 0 0 0 0 2 3 4 9		F. Transporter's Phone (215) 343-0600		
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) Flammable Liquid, H.O.S. (Mixed Solvents) Flammable Liquid UN1993 (0001)		12. Containers No. Type 0 0 1 TT		13. Total Quantity 61300	14. Unit Unit g	15. Waste No. D 0 0 0 1
J. Additional Descriptions for Materials Listed Above (include physical state and hazard code) Haz. Code Physical State U 7283		K. Handling Codes for Wastes Listed Above a. b. c. 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 proper shipping name and are classified, packed, method and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize the waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name Robert H. Vernon		Signature <i>Robert H. Vernon</i>		Month Day Year 11 3 88		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Ed Williams		Signature <i>Ed Williams</i>		Month Day Year 11 3 88		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. 100128						
Printed/Typed Name		Signature		Month Day Year		

In case of an emergency or spill immediately call the National Response Center (800) 424-8802 and the PA DER (717) 787-4343

EPA Form 8700-22 (Rev. 9-88) (Previous editions are obsolete)

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Form Approved OMD No. 3000-0030 Expires 9-30-91

please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No. PAP000002242	Manifest Document No.	2 Page of 1	Information to be attached along with this manifest by Federal law
State of New Jersey USEPA Region IV 841 Chestnut St. Philadelphia, PA 19107 Phone: 215-597-7328		US EPA ID Number	State Manifest Identification Number NJA 0640177	State manifest number 5238 Belvidere Philadelphia, PA 19144	
Shipper's Name Nappi Trucking		US EPA ID Number NJD000813477	US EPA ID Number	State manifest number 201566-3000	
Recipient's Name and Address Chemical Waste Management of N.J., Inc 100 Lister Ave. Newark, NJ 07105		US EPA ID Number NJD089216740	US EPA ID Number	State manifest number 201465-7100	
11. Describe in detail the hazardous waste, including proper shipping name, hazard class, and ID number(s).			12. Container No. Type	13. Total Quantity	14. Unit Vol. Wt. Wt.
Waste Corrosive Solid, N.D.S. X Corrosive material, UN 1759			107DM	285	0002
Solid/Corrosive 99% HCL			SIC 501		
EWM Profile # H 76618 EWM Work Order # 501047 OWM P.O. # 203,112			Emergency Contact: Basil C. Kellias C.H. Materials Corp. 609-987-0010		
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.					
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically achievable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. If I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best available management method that is available to me and that I can afford.					
Signature of Generator John Owens			Signature of Recipient John Owens for EPA Month Day Year 11/01/1989		
Signature of Recipient Ronnie Hopkins			Signature of Generator John Owens Month Day Year 11/01/1989		
Signature of Recipient John Owens			Signature of Generator John Owens Month Day Year 11/01/1989		
17. I am a large quantity generator. I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically achievable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. If I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best available management method that is available to me and that I can afford.					
INCORRECTLY PRINTED NAME IN 7B AS NOTED IN 12A TO THE QUANTITY AMOUNT INCORRECT CHANGE TO 201566-3000 JOHN OWENS					
Signature of Generator John Owens					

In case of an emergency, call the nearest emergency response team. (609) 292-5560 (toll free) (609) 292-7172 (night)

NJ 0640177



DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS SUBSTANCES REGULATION
HAZARDOUS WASTE MANIFEST
P.O. Box 12820, Albany, New York 12212

Form Approved, GMB No. 2090-0039, Expires 9/30/91

Please print or type. Do not Staple.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA No. PAPD000022242	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal Law.
3. Generator Name and Mailing Address 541 Chestnut Building Philadelphia, Pa 19107				A. State Manifest Document No. NY B 302349 6	
4. Generator's Phone 215 597-9328				G. Generator's ID Philadelphia, Pa 19144	
5. Transporter 1 (Company Name) WILLIAM STRASSBURG JR				C. State Transporter's ID 121178	
6. US EPA ID Number NYD043815703				D. Transporter's Phone (212) 778-1111	
7. Transporter 2 (Company Name)				E. State Transporter's ID	
8. US EPA ID Number				F. Transporter's Phone	
9. Designated Facility Name and Site Address Frontier Chemical Waste Process Inc. 4626 Royal Ave. Niagara Falls, NY 14303				I. US EPA ID Number NYD043815703	
10. US EPA ID Number				G. State Facility's ID	
11. US DOT Description (including Proper Shipping Name, Hazard Class and ID Number) Waste Flammable Liquid, N.O.S. Flammable Liquid, UN1943.				H. Facility's Phone (716) 285-8208	
12. Containers No. Type				13. Total Quantity	
14. Unit Weight				I. EPA STATE	
15. Special Handling Instructions and Additional Information Approval Code: 2127-20 Work order No. 15701				K. Handling Codes for Wastes Listed Above	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations. If I am a large quantity generator, I certify that I have program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small generator, I have made a good faith effort to minimize my waste and select the best waste management method that is available to me and that I can afford.				Emergency Contact: Basil C. Kullias OH Materials Corp. 609-937-0010	
Printed/Typed Name JOHN (Signature)				Signature (Signature) Mo. Day Year	
17. Transporter 1 (Acknowledgement of Receipt of Materials) Printed/Typed Name WILLIAM STRASSBURG JR				Signature (Signature) Mo. Day Year	
18. Transporter 2 (Acknowledgement of Receipt of Materials) Printed/Typed Name				Signature (Signature) Mo. Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name (Signature) Signature (Signature) Mo. Day Year					

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the N.Y. Dept. of Environmental Conservation (516) 457-7552.

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

COPY 8—Generator—retained by generator

100130

NY B302349 6



Form Approved, OMB No. 2050-0049, Expires 9-30-91

GENERATOR INITIAL COPY

REGION III INCIDENT NOTIFICATION REPORT

1. Case No.:

PA 87 798

2. Reported: (mm/dd/yy) 7-14-87		3. Time: 0847		Recorded By: G.H. Arai	
☐ Through NRC:		5. NRC Case No.:			
A. REPORTER	6. Reported By: Fire Communications / City of Phila. F. Dept.				
	7. Organization Name: Fire Dept.				
	8. Organization: ☐ 9. discharger ☐ 10. public ☐ 11. state ☒ 12. local ☐ 13. federal				
	14. Address:				
B. DISCHARGER	15. City: Phila		16. County:		17. State: PA
	18. Zip:		19. Phone: (215) 5980 -		
	20. ☐ As Above in A if 9 applies 21. Name: Beyond Craft G. / Bob Vernon (owner)				
	22. Address: 5748 Fox 5238 Bullfield Ave + Wister				
C. INCIDENT LOCATION	23. City: Phila		24. County:		25. State: PA
	26. Zip:		27. Phone: () 646 4714		
	28. ☒ As Above in B 29. Street or Approx. Location:				
	30. City:				
D. DATE	33. Spill Date: (mm/dd/yy)		34. Spill Time:		
	Material: ☐ Of hazardous substance		35. Material Unknown	UNW DOT No	CAS No.
	36. Methanol / Printing Ink		37.	38.	39.
	40. Brake Fluid		43.	44.	45.
E. MATERIAL	41. Misc Containers		49.	50.	51.
	Source of Spill: ☐ 54. highway ☐ 55. air transport ☐ 56. railway ☐ 57. vessel ☒ 58. fixed facility ☐ 59. pipeline ☐ 60. offshore Federal facility ☐ Unknown		61. Vehicle ID or Carrier No.:		
	62. Description:				
	63. Medium Affected: ☒ 63. air ☒ 64. land ☐ 65. water ☐ 66. groundwater ☐ 67. within facility only none				
F. SOURCE	68. Waterway Affected				
	Reported Cause: ☐ 69. transportation accident ☐ 70. equipment failure ☐ 71. operational error ☐ 72. natural phenomenon ☐ 73. dumping ☐ 74. unknown ☐ 75. other				
	76. Description: Fire / Explosion				
	77. no. of injuries 78. no. of deaths 79. property damage > \$50,000				
G. MED.	80. ☐ Evacuation 81. Response Action Taken: Fire Co. 4 alarm Fire. EIA				
	82. state/local 83. discharger 84. USCG 85. other 86. unknown				
	Agency Name: EPA / ERS.				
	87. Comments: Continue may be empty				
H. CAUSE	Additional Information				
	Responsibility: ☒ EPA ☐ USCG ☐ Non-duty hours ☐ CWA 311 Spill letter				
	Response by: ☐ responsible party ☐ State ☐ local ☒ USCG ☐ other ☐ USCG				
	Agency Name:				
I. ID	II OSC: Name: Arai / Young 311 Activation - PIC # CERCLA Activation				
	EPA NOTIFICATION: Name, date, & time: State/local: Phila. Ind. Wash. OSC notified: G. Arai WFO: EPA: 100132 Referral:				

WAK ykk

REGION III INCIDENT NOTIFICATION REPORT

1. Case No.:

2. Reported: (mm/dd/yy) 7-14-87		3. Time 0847		Recorded By: GRATAC	
☐ Through NRC:		5. NRC Case No.:			
A. REPORTER	6. Reported By: AS Officer Corporal				
	7. Organization Name: 14th District Police				
	8. Organization: ☐ 9. discharger ☐ 10. public ☐ 11. state ☒ 12. local ☐ 13. federal				
	14. Address: 14th District				
	15. City: Phila.		16. County: PA.		17. State: PA
18. Zip:		19. Phone: (215) 686 3140			
B. DIS-CHARGER	20. ☐ As Above in A (if 9 applies) 21. Name:				
	22. Address:				
	23. City:		24. County:		25. State:
	26. Zip:		27. Phone: ()		
C. INCIDENT LOCATION	28. ☐ As Above in B 29. Street or Approx. Location: 5148 Bellfield Ave + W. 5th St				
	Beyond Craft Co.				
	30. City: Phila		31. County:		32. State: PA
D. DATE		33. Spill Date: (mm/dd/yy)			
E. MATERIAL	34. Spill Time:		35. Material: ☐ Oil ☐ Hazardous substance ☐ Unknown		
	36. Methanol		37. Printing Ink	38.	39.
	40. Brake fluid		41.	42.	43.
	44. Misc Containers		45.	46.	47.
	48.		49.	50.	51.
F. SOURCE	Source of Spill: ☐ 54. highway ☐ 55. air transport ☐ 56. railway ☐ 57. vessel ☐ 58. fixed facility ☐ 59. pipeline ☐ 60. offshore ☐ 61. Federal facility ☐ 62. Unknown				
	63. Description: Fire / Explosion				
G. MED.	Medium Affected: ☐ 63. air ☐ 64. land ☐ 65. water ☐ 66. groundwater ☐ 67. within facility only none				
	68. Waterway Affected:				
H. CAUSE	Reported Cause: ☐ 69. transportation accident ☐ 70. equipment failure ☐ 71. operational error ☐ 72. natural phenomenon ☐ 73. dumping ☐ 74. unknown ☐ 75. other				
	76. Description:				
I. DAMAGES	Damages: 77. no. of injuries _____ 78. no. of deaths _____ ☐ 79. property damage > \$50,000				
	80. ☐ Evacuation 81. Response Action Taken:				
J. NOTIFICATIONS	82. state/local ☐ 83. discharger ☐ 84. USCG ☐ 85. other ☐ 86. unknown				
	Agency Name: EPA				
K. COMMENTS	87. Comments				
	Additional Information				
L. RECORDING DATA FIELDS	Responsibility: ☐ EPA ☐ USCG ☐ Non-duty hours ☐ CWA 311 Spill team				
	Response by: ☐ responsible party ☐ State ☐ local ☐ OSC ☐ other ☐ USCG				
	Agency Name:				
	If OSC: Name _____ ☐ 311 Activation -- PIC # _____ ☐ CERCLA Activation				
	EPA NOTIFICATION: Name, date, & time: _____ OSC notified: _____ WFO: _____ EPA: _____				

100133

14th District = 686-3140

- Commissioner's Office -

- Fire Co. 592-5950 Administrative

- Fire Communications + S 4 Alarm
Contains Drums.
Supposedly empty.

Brake fluid + Methanol

To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Tue 14-Jul-87 16:51 EDT Sys 163
Subject: DRAFT POLREP FOR VISUAL PACKING CO.. FIRE: EMER. RESPONSE
Mail Id: 1PM-163-870714-151701214

PA87798

VISUAL PACKING CO. FIRE
GERMANTOWN, PHILADELPHIA CO., PA
EMERGENCY RESPONSE

POLREP #1

ATTN: TOM MASSEY AND TOM FIELDS

I. SITUATION: (1200 HRS., 7/14/87)

- A. AT APPROXIMATELY 0550 HRS THIS AM AN EXPLOSION OCCURRED AT THE VISUAL PACKING CO., INC. PLANT AT 5238 BELFIELD.
- B. PERSONNEL ON SCENE: EPA-1. TAT-2. PFD-30.
- C. WEATHER: PARTLY CLOUDY, TEMPS IN THE LLW 90'S.
- D. AT 0800 HRS. THE PHILA. FIRE DEPT. CONTACTED ERS/EPA TO REQUEST TECHNICAL ASSISTANCE IN DEALING WITH A FIRE LOCATED AT 5238 BELFIELD AVE. IN GERMANTOWN, PA. REPORTEDLY, THE FIRE STARTED AFTER 3 MAJOR EXPLOSIONS OCCURRED AT THE SITE AT APPROX. 0550 HRS.
- E. AT 1015 HRS OSC ARAI AND TATM'S SCOTT AND WILLIAMS ARRIVE ON SCENE. THE FIRE FIGHTERS WERE CONTINUING TO SPRAY WATER INTO THE BUILDING IN AN EFFORT TO SQUELCH THE FIRE.

II. ACTIONS TAKEN

- A. OSC ARAI AND TAT INTERVIEWED THE OWNER/OPERATOR OF VISUAL PACKING, BOB VERNON. MR. VERNON INDICATED THAT THE FOLLOWING ITEMS WERE PRODUCED IN THE PLANT: HAND SOAP, GASFINDER, WATERFINDER, ZINC OXIDE PRODUCTS, METHANOL BLENDS, BRAKE FLUID, AND ISOPROPYL ALCOHOL. MR. VERNON ALSO INDICATED THAT SIX (6) 1,000 GAL. TANKS EXISTED. TWO OF WHICH ARE FULL. ONE CONTAINS METHANOL AND THE OTHER CONTAINS ISOPROPYL ALCOHOL. TWO UNDERGROUND STORAGE TANKS ARE PRESENT ON THE PROPERTY. ONE 5,000 GALLON TANK WHICH IS EMPTY. AND A 10,000 GALLON TANK CONTAINING APPROXIMATELY 6,000 GALLONS OF ALCOHOL. APPROXIMATELY 100 DRUMS ARE IN THE BUILDING CONTAINING THE ABOVE MENTIONED PRODUCTS. MR. VERNON INDICATED THAT SEVERAL DRUMS WERE LOCATED ON THE ROOF OF THE BUILDING AND THAT THE NATURE OF THE CONTENTS WAS UNKNOWN. THESE DRUMS WERE LEFT BY A PREVIOUS TENNANT.
- B. OSC ARAI QUESTIONED FIRE MARSHALL ULSHAFFER ABOUT THE POSSIBILITY OF MAKING AN ENTRY INTO THE BUILDING IN ORDER TO FURTHER ASSESS THE SITUATION. THE FIRE MARSHALL STATED THAT THE EARLIEST A SAFE ENTRY COULD BE MADE WOULD NOT BE UNTIL THE FOLLOWING AM.

- C. TAT PROVIDED LOGBOOK AND PHOTO DOCUMENTATION OF ALL SITE ACTIVITIES.
- D. UPON CONVERSATION WITH THE FIRE MARSHALL. VISUAL PACKING CO. DOES NOT HAVE ANY STATE, LOCAL. CITY OR FEDERAL PERMITS OR LICENSES.
- E. MR. VERNON STATED THAT HE IS. AT THIS POINT IN TIME. PROBABLY BANKRUPT AND HAS NO INSURANCE. THE COMPANY WAS A SELF CONTRACT MANUFACTURER.

III. FUTURE PLANS

- A. OSC. ENFORCEMENT (STEUTEVILLE). OPA (RAY GERMANN) AND TAT TO RETURN TO THE SITE 7/15/87 TO CONDUCT AN ASSESSMENT OF THE PROPERTY.
- B. OSC ARAI TO CONTACT CERCLA ENFORCEMENT.
- C. TAT TO CONTINUE TO PROVIDE TECHNICAL ASSISTANCE. LOGBOOK DOCUMENTATION AND PHOTOGRAPHS OF ALL ON SITE ACTIVITIES.
- D. OSC TO EVALUATE CONTROL AND STABILIZATION CRITERIA WITHIN 24 HRS.
- E. FIRE MARSHALL TO PROVIDE SECURITY THROUGH THE CITY POLICE DEPARTMENT FOR TWO DAYS WHILE THE FIRE MARSHALL'S OFFICE IS INVESTIGATING THE CAUSE OF THE FIRE,

GARRETT ARAI. OSC
US EPA, REGION III
PHILADELPHIA, PA

100136

To: ERD/OERR (EPA5511)
To: T. MASSEY (EPA9374)
From: T. MASSEY (EPA9374) Delivered: Thu 30-July-87 8:27 EDT Sys 163 (1
Subject: VISUAL PACKING CO. FIRE POLREP #2
Mail Id: IPM-163-870730-076090354

POLREP 2
VISUAL PACKING CO. FIRE
GERMANTOWN, PHILADELPHIA CO., PA
SITE ASSESSMENT

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION

- A. PERSONNEL ON SCENE: TAT-3, EPA-2, PFD, PAD, PRP, PRP ATTORNEY, INS. ADJUSTER, BLDG. TENNANTS, NEIGHBORS, PHILA. LIC. & INSPECTION.
- B. FIRE STABILIZED THIS 7-14-87
- C. FIRE MARSHALL ULSHAFFER SUSPECTED ARSON. CAUSE OF FIRE SOURCE UNKNOWN AT THIS TIME. FIRE MARSHALL STILL INVESTIGATING.
- D. SITE SECURITY BY CITY OF PHILA. DEPARTS AT 1700 HRS. VERNON (PRP) ESTABLISHED 24 HR SECURITY.
- E. WEATHER: CLEAR, COOL 70'S.

II. ACTIONS TAKEN

- A. SITE ASSESSMENT MADE BY PFD, EPA AND TAT. SITE INVENTORY AND PHOTOS BY TAT.
- B. PRP VERNON VERBALLY AGREES TO CLEAN UP PROPERTY AND HAZ. MATERIALS ON PROPERTY, EXCLUDING DRUMS ON ROOF ABANDONED BY A FORMER TENNANT. DUE TO GOOD FAITH INDICATED BY PRP ENFORCEMENT WILL WRITE CONSENT AGREEMENT.
- C. PGW ON SCENE TO SECURE UTILITIES.
- D. CITY OF PHILA. LIC. & INSPECTION ON SCENE TO PERFORM INSPECTION AND DETERMINE CODE VIOLATIONS.
- E. HAZARDOUS MATERIALS INFORMATION:
 1. TANKS-6, 3 OF METHYL T-BUTYL ETHER (MTBE), 700 GAL EACH. 1 EMPTY. 1 ISOPROPYL ALCOHOL (IPA), 600 GAL. 1 MINERAL SPIRITS, 900 GAL. 1 UNDERGROUND METHANOL (MEOH) 7000 GAL.
 2. DRUMS-NUMEROUS, LABELS INCLUDE:
SODIUM SILICATE
ADHESIVE (UNSPECIFIED TYPE/COMPOSITION)
CEMENT RUBBER
SILICONE (UNSPECIFIED COMPOSITION) 100137
MAGIC LUX LATEX
DIETHYLENE GLYCOL
SILOO WHITE LITHIUM NO. 2 (PAINT)
-DRUMS WERE LOCATED ON THE MAIN FLOOR OF THE BUILDING AND ON THE ROOF.

3. MISC. CONTAINERS - 1 GALLON CAN OF TETRAHYDROFURAN (THF). PALLETS OF GLUE CONTAINERS, LABELS INDICATE PRESENCE OF TOLUENE.
 4. UNKNOWNNS - UNKNOWNNS INCLUDE UNLABELED DRUMS, DAMAGED DRUMS. SOME OILS NOTED.
 5. EXPLOSIMETER AND HNU READINGS - EXPLOSIMETER WAS NEGATIVE THROUGHOUT BUILDING, HNU READINGS WERE AS FOLLOWS : 0-20 UNITS GENERAL THROUGHOUT BUILDING, 50-100 UNITS AROUND TANKS, 2-20 UNITS STEADY DOWNSTAIRS.
-
- F. OSC INFORMED PRP VERNON OF NON-NOTIFICATION AND ADVISED PRP TO NOTIFY EPA ERB RRC OF RELEASE VIA FIRE AND RUNOFF.
 - G. EPA ENFORCEMENT (STUETEVILLE) ESTABLISHES THAT PRP NOT HANDLE ANY MATERIAL IN BUILDING UNTIL WRITTEN CONSENT AGREEMENT IS REACHED BETWEEN ENFORCEMENT AND PRP.
 - H. FIRE MARSHALL ULSHAFFER DETERMINES THAT A FIRE AND EXPLOSION THREAT STILL EXISTS ON PROPERTY DUE TO MATERIAL RESIDUES AND LEAKING CONTAINERS ON PROPERTY.
 - I. CITY OF PHILADELPHIA LIC. & INSPECTION INDICATES THAT A CRANE WILL BE BROUGHT IN ON SCENE TO LEVEL PORTIONS OF THE BUILDING DUE TO LACK OF STRUCTURAL INTEGRITY WHICH POSES A THREAT TO PUBLIC SAFETY.
 - J. ENFORCEMENT (STUETEVILLE) TO PURSUE CONTACT WITH PREVIOUS TENNANT WHO ABANDONED APPROX. 25-30 DRUMS OF UNKNOWNNS ON THE PREMISES.
 - K. ACCESS WALKWAY TO SEPTA TRAIN STATION IS LOCATED ADJACENT TO PORTIONS OF THE DAMAGED BUILDING. CITY POLICE BLOCKED OFF ENTRANCE TO WALKWAY.
-
- L. OSC CONTACTED OSHA REGARDING SAFETY AND INDUSTRIAL HYGIENE ISSUES EXISTING ON THE PROPERTY. DUE TO THE TYPES OF SUBSTANCES INVOLVED IN THE FIRE, WHICH ARE STILL IN DAMAGED CONTAINERS AND SOME UNCONTAINED MATERIALS SPREAD ALL OVER THE BUILDING, APPROPRIATE WORKER ATTIRE IS LEVEL "B". CONSTANT AIR MONITORING SHOULD OCCUR WHILE WORKING INSIDE THE BUILDING.
 - M. PRP VERNON ADVISES OSC

III. FUTURE PLANE

- A. CERCLA ENFORCEMENT TO WRITE CONSENT AGREEMENT WITH PRP VERNON.
- B. CERCLA ENFORCEMENT TO MONITOR PRP CLEANUP.
- C. OSC TO PURSUE ACTION ON ABANDONED DRUMS ON PROPERTY.

100138

To: ERD/OERR (EPASS11)
To: T. MASSEY (EPAG374)
From: T. MASSEY (EPAG374) Delivered: Tue 13-July-87 12:06 EDT GYA 13:
Subject: VISUAL PACKAGING CO. FIRE POLREP #3
Mail Id: 1PM-163-870728-108980931

POLREP 3
VISUAL PACKAGING CO. FIRE
BERMANTOWN, PHILADELPHIA CO., PA
PRELIMINARY SITE INVESTIGATION

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (7-14-87, 1800 HOURS)

- A. PERSONNEL ON SCENE: TAT-3, EPA-1, ARP-2,
OSHA-4, PHILA. DEPT. OF LIC. AND INSPECTIONS (L+I)-1
- B. OSHA ON-SCENE TO PERFORM ASSESSMENT OF BUILDING FOR
STRUCTURAL INTEGRITY AND WORKER SAFETY. FINDINGS
TO BE USED TO APPROVE/DISAPPROVE RP CLEANUP PLAN.
- C. WEATHER: HOT, HUMID, HIGH 90'S.

II. ACTIONS TAKEN

- A. MEETING BETWEEN EPA ENFORCEMENT, OSHA, PADER, L+I, CITY
OF PHILADELPHIA, AND TAT ON 7-23. ACTIONS AT MEETING:
 1. OSHA MUST INSPECT BUILDING FOR STRUCTURAL
INTEGRITY AND WORKER SAFETY BEFORE ADVISING
EPA ENFORCEMENT OF SOUNDNESS OF RP CLEANUP
PLAN.
 2. L+I STATED BUILDING WAS DECLARED IMMINENTLY
DANGEROUS (ID) ON 7-23. BUILDING HAS BEEN
POSTED.
 3. THE FOLLOWING DOCUMENTS WERE DISTRIBUTED:
 - A. EPA ENFORCEMENT LETTER TO RP.
 - B. EPA ENFORCEMENT DRAFT CONSENT
AGREEMENT.
 - C. CLEANUP PLAN SUBMITTED BY RP TO
EPA ENFORCEMENT.
 4. MEETING ENDED WITH DECISION TO INSPECT BUILDING
MORNING OF 7-24.
- B. TAT MADE LEVEL "B" ENTRY TO MONITOR BUILDING WITH
EXPLOSIMETER AND OVA. THE FOLLOWING CONDITIONS WERE
REPORTED:

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1. NO READINGS ON EXPLOSIMETER THROUGHOUT BUILDING
2. OVA BACKGROUND: 0-1 UNIT THROUGHOUT BUILDING
3. OVA READINGS: MAIN FLOOR: 1 DRUM MEASURED APPROX. 700 UNITS WITHIN 1 FOOT OF OPEN BUNG. BASEMENT: 20-30 UNITS IN AREA OF 5 GALLON CANS LABELED "FLAMMABLE LIQUID".

- C. OSHA AND EPA ENFORCEMENT MADE LEVEL "D" ENTRY TO OBSERVE STRUCTURAL CONDITIONS WITHIN BUILDING. TAT PROVIDED EPA ENFORCEMENT WITH EXPLOSIMETER.
- D. TAT NOTES HIGH HEAT STRESS DURING LEVEL "B" ENTRY.
- E. BASED ON TAT FINDINGS, EPA ENFORCEMENT DIRECTED RP TO REPLACE BUNG ON OPEN DRUM WITH 700 UNIT OVA READING. RP COMPLIED WITH EPA REQUEST.
- F. RP VERNON SIGNED CERCLA (106) CONSENT ORDER PROVIDED BY ENFORCEMENT.
- G. OSHA STATES THAT BUILDING AREAS NOTED IN RP CLEANUP PLAN ARE SAFE FOR LIMITED CLEANUP OPERATIONS IF THE FOLLOWING CONDITIONS CAN BE MET:
 1. REMOVE OR STABILIZE REMAINING UNSTABLE FACADE.
 2. WORKERS SHOULD SECURE APPARENTLY UNSTABLE CARTONS ON SECOND FLOOR.
 3. RP VERNON SHOULD DEMARK AND SECURE AREAS DESIGNATED IN WORK PLAN AND CREATE A MANAGEMENT LINE AND ALLOW NO WORKERS TO PROCEED BEYOND THAT LINE.
 4. AISLEWAYS WITHIN WORK AREAS MUST BE CLEARED TO ALLOW UNOBSTRUCTED PASSAGE.
 5. WHEN ABOVE TASKS ARE COMPLETED, RP MAY PROCEED WITH CLEANUP PLAN.
 6. AFTER PRODUCT/MATERIAL IS REMOVED, REMAINING LOOSE CONTAINERS AND DEBRIS SHOULD BE COLLECTED, IDENTIFIED, LABELED, AND SHIPPED ACCORDINGLY.
- H. EPA ENFORCEMENT HAS BEEN PROVIDED WITH MSDS DATA FOR ALL COMPANY PRODUCTS.
- I. TAT PROVIDED LOGBOOK AND PHOTODOCUMENTATION OF SITE ACTIVITIES.

III. FUTURE PLANS

- A. ENFORCEMENT FOLLOWING UP R.P. ISSUES OF ABANDONED DRUMS OF UNKNOWN.

100140

- B. CERCLA ENFORCEMENT TO MONITOR PRP CLEANUP.
- C. RP TO PROCEED WITH LIMITED CLEANUP WITHIN THE SCOPE OF OSHA APPROVED SECTIONS OF CLEANUP AGREEMENT.

GARRETT ARAI, OSC
US EPA, REGION III
PHILADELPHIA, PA

POLREP 4
VISUAL PACKAGING CO. FIRE
GERMANTOWN, PHILADELPHIA CO. , PA
SITE ASSESSMENT/INVENTORY/RP CLEANUP MONITORING
ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (8-06-87, 1400 HOURS)

- A. PERSONNEL ON SCENE: TAT-3, EPA-2.
- B. BUILDING WAS NOTED WITHOUT 24 HOUR SECURITY.
- C. WEATHER: HOT, HUMID, HIGH 90'S.
- D. NO PRP ACTIVITY ON-SCENE.

II. ACTIONS TAKEN

A. TAT AND EPA PERFORMED INSPECTION AND INVENTORY OF DRUMS WITHIN BUILDING. THE FOLLOWING CONDITIONS WERE NOTED:

- 1. RP HAD CLEARED OUT PACKAGED CONTENTS IN STORAGE AREA.
- 2. RP HAD CLEARED AISLEWAYS WITHIN WORK AREA AS PER OSHA REQUEST.
- 3. APPROX. 200 DRUMS NOTED REMAINING ON ROOF.
- 4. APPROX. 50 DRUMS NOTED IN MAIN VISUAL PACKAGING SHOP/MANUFACTURING AREA.
- 5. DRUMS NOTED IN WOOD SHOP BACK ROOM.
- 6. UNDERGROUND TANK DISCOVERED TO BE PARTIALLY EMPTY.
- 7. OIL FILM NOTED ON SURFACE OF LIQUID IN UNDERGROUND TANK.
- 8. OIL RESIDUE NOTED IN AREA AROUND BURIED TANK. OIL DEPTH ESTIMATED AT THREE FEET.

B. TAT INVENTORY PRODUCED THE FOLLOWING HAZARDOUS MATERIALS LIST:

1. IN THE WOODSHOP BACK ROOM:

- A. 1(ONE) FIVE GALLON CAN LABELED AROCLOR 1242 (PCB).
- B. 1(ONE) DRUM LABELED DIBUTYL PHTHALATE.
- C. 1(ONE) DRUM LABELED XYLENES.
- D. 1(ONE) DRUM LABELED AMMONIUM HYDROXIDE.
- E. 1(ONE) DRUM LABELED PETROSOLVE 230D.
- F. 1(ONE) DRUM LABELED UN 2553 (PET. NAPHTHA).
- G. 1(ONE) DRUM LABELED CARBITOL ACETATE.
- H. 1(ONE) DRUM UNKNOWN.
- I. 1(ONE) 5 GAL. CAN LABELED MIBK (METHYL ISOBUTYL KEYTONE).
- J. 1 (ONE) FIVE GAL. CAN LABELED TOLUENE.
- K. 1 (ONE) 5 GAL. CAN LABELED CARBITOL ACETATE.
- L. 1 (ONE) 5 GAL. CAN LABELED ETHYLENE GLYCOL.
- M. 1 (ONE) FIVE GAL. CAN LABELED BUTYL CARBITOL.
- N. 1 (ONE) 5 GAL. CAN LABELED DIPROPYLENE GLYCOL.
- O. 1 (ONE) 5 GAL. CAN LABELED BUTYL ALCOHOL.
- P. 1 (ONE) 5 GAL. CAN LABELED ETHYL SILICATE.
- Q. 1 (ONE) 5 GAL. CAN LABELED METHANOL.
- R. 1 (ONE) 5 GAL. CAN LABELED DIOCTYL PHTHALATE.

2. IN THE BASEMENT AREA:

- A. 3 PALLETS OF LEAD CONTAINING GLAZING COMPOUND.
- B. 1 (ONE) 1 GAL. CAN LABELED THF.
- C. APPROX. 500 CASES (24 BOT. EACH) OF GLUE CONTAINING TOLUENE.
- D. 1 PALLET MISC. UNKNOWN IN PLASTIC JUGS.

3. IN VISUAL PACKAGING SHOP AREA:

- A. APPROX. 20 PALLETS CONTAINING CASES OF METHANOL PRODUCT.
- B. 1 FIRE DAMAGED PALLET OF VINYL ADHESIVE.
- C. APPROX. 50 DRUMS WITH UNKNOWN CONTENTS.
- D. APPROX. 20 FIVE GAL. CANS WITH UNKNOWN CONTENTS.

4. IN COLLAPSED ROOF AREA OF WOOD SHOP:

- A. APPROX. 20 DRUMS BURIED UNDER ROOF DEBRIS.
- B. PALLETS CONTAINING CERAMICS SUPPLIES INCLUDING: CLAY, LEAD CONTAINING GLAZING COMPOUND, AND CEMENT POWDER.

100141

- C. COLLAPSED ROOF NOTED TO COVER DRUMS OF UNKNOWN. ROOF DAMAGE IS EXTENSIVE. AREA WILL REQUIRE MAJOR WORK TO REMOVE STRUCTURAL STEEL ROOF.
- D. SEVEN HIGH VOLTAGE OIL COOLED TRANSFORMERS NOTED ON ROOF. OF VISUAL PACKAGING WORK AREA.
- E. POOL OF WATER AND OIL NOTED AT BOTTOM OF ELEVATOR SHAFT IN SUB-BASEMENT.
- F. HEAVY METAL (LEAD) CONTAINING COMPOUNDS NOTED IN 50 LB. BAGS IN WOODSHOP AREA.
- G. COMPRESSED AIR CYLINDERS NOTED ON ROOF NEAR DRUMS.

III. FUTURE PLANS

- A. ACTION MEMO TO BE ASSEMBLED.
- B. CERCLA ENFORCEMENT TO CONTACT RP REGARDING WORK PERFORMED.
- C. RP TO PROCEED WITH LIMITED CLEANUP WITHIN THE SCOPE OF OSHA APPROVED SECTIONS OF CLEANUP AGREEMENT.

GARRETT ARAI, OSC
US EPA, REGION III
PHILADELPHIA, PA

100142

TLX II 7108229269
CONNECTED 12-Aug-87 16:14 29

SPILLSEPA WSH

43

PDREP # 5
BELFIELD AVE FIRE/EMERGENCY RESPONSE
/PHILADELPHIA, PHILADELPHIA CO. PA

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (8-12-87)

A. NAME OF SITE IS, AS OF THIS POINT IN TIME, CHANGED FROM THE VISUAL PACKAGING CO. SITE TO THE BELFIELD AVE. SITE. THE SITE LIES IN THE CITY OF PHILADELPHIA LIMITS.

B. ACTION MEMO SUBMITTED INTO CONCURRENCE AS OF THIS DATE.

C. CRES HAS MADE ATTEMPTS TO CONTACT FORMER TENNANTS OF THE BELFIELD AVE PROPERTY. CRES IS STILL TRYING TO REACH THESE FORMER TENNANTS/PRP'S AT THIS TIME.

D. VISUAL PACKAGING INC. (VPI) IS AT THIS POINT IN TIME IN VIOLATION OF THEIR CONSENT AGREEMENT AND ORDER SIGNED ON JULY 24, 1987 STATING THAT 24 HOUR SITE SECURITY WILL BE PROVIDED TO PREVENT, TO THE EXTENT PRACTICABLE, UNAUTHORIZED ENTRY; AND THE ACTIONS REQUIRED IN THE WORK PLAN WOULD BE COMPLETED WITHIN FOURTEEN (14) DAYS OF THE EFFECTIVE DATE OF THE CONSENT AGREEMENT AND ORDER.

II. FUTURE PLANS

A. UPON APPROVAL OF ACTION MEMO OSC INTENDS TO MEET WITH ALL REGULATORY STATE AND LOCAL AGENCIES AND R.P. VERNON TO FULLY LAY OUT ALL ASPECTS OF THE REMOVAL.

GARRETT H. ARAI
ON SCENE COORDINATOR
USEPA REGION III
PHILA, PA

100143

DISCONNECTED 12-Aug-87 16:19 02

To: ERD/DERR (EPA5511)
To: T. MASSEY (EPA9374)
From: T. MASSEY (EPA9374) Delivered: Fri 21-Aug-87 19:20 EDT Sys 163
Subject: BELFIELD AVENUE POLREP 6
Mail Id: 1PM-163-870821-174080400

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA REMOVAL ACTION

POLREP #6

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1730 HOURS, 20 AUGUST, 1987)

- A. OSC ARAI RECEIVED NOTIFICATION OF ACTION MEMO APPROVAL AT 1000 HOURS THIS DATE.
- B. PROJECT FUNDS ARE ALLOCATED AS FOLLOWS:

AGENCY	CEILING
EPA	30K
ERCS	250K
TAT	60K
HQ	126K

PROJECT CEILING 1,026,000

II. ACTIONS TAKEN

- A. OSC HAS ACTIVATED TAT AND ERCS MECHANISM TO INITIATE THIS CERCLA REMOVAL ACTION.
- B. STATE OF PA DER HAS BEEN UPDATED AS TO CURRENT SITE STATUS BY OSC ARAI. OSC HAS ALSO BRIEFED OSHA REP.
- C. OSC ARAI TASKED TAT TO DRAFT SITE SAFETY PLAN, SAMPLING PLAN, AND SCOPE OF WORK.
- D. OSC HAS TASKED TAT WITH CONTRACTOR COST MONITORING FOR THE REMOVAL.
- E. FAS (OSTRANDER) CONTACTED THE FOLLOWING TO MEET ON 8/21/87 AT EPA'S REGIONAL OFFICE REGARDING SITE STATUS:

CITY OF PHILA L & I
CITY OF PHILA FIKE MARSHALL
TECHNICAL ASSISTANT TEAM
OSHA
CITY MANAGING DIRECTORS OFFICE
PADER

III. FUTURE PLANS

- A. OSC ARAI TO BRIEF ERCS RM ON SITE HISTORY AND PERFORM VISUAL INSPECTION OF SITE AT 0930 HOURS 21 AUGUST, 1987.
- B. ERCS MOBILIZATION DATE TENTATIVELY SCHEDULED FOR MON. 24 AUGUST, 1987.

GARRETT H. ARAI, OSC
US EPA, REGION III
PHILADELPHIA, PA

100144

To: ERD/DERR (EPA5511)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Fri 21-Aug-87 19:57 EDT Sys 163
Subject: BELFIELD AVENUE SITE POLREP 7
Mail Id: IRM-163-870821-179670247

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA REMOVAL ACTION

POLREP #7

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1600 HOURS, 21 AUGUST, 1987)

- A. PERSONNEL ON SCENE: EPA-2, TAT-2, ERCS-1, PRP-2.
- B. PROJECT FUNDS ARE ALLOCATED AS FOLLOWS:

AGENCY	CEILING
EPA	\$ 30K
ERCS	250K
TAT	60K
HQ	126K

PROJECT CEILING 1,026,000

- C. WEATHER: TEMP: 80'S, SUNNY AND WINDY.
- D. OSC ARAI CONTINUES TO COORDINATE WITH PRP ON RELEVANT ASPECTS OF THE REMOVAL AND PRP'S CONTRIBUTION TO SITE CLEANUP.
- E. OSHA INTEREST IN THIS REMOVAL PROJECT REMAINS HIGH.

II. ACTIONS TAKEN

- A. OSC ARAI, JOAN HENRY, EPA FIELD ADMINISTRATIVE SPECIALIST (FAS), TAT, AND ERCS RM ON SCENE TO ASSESS BLDG. AND DISCUSS REMOVAL ACTIVITIES WITH PRP AS WELL AS TO LAY OUT PLANS FOR REMOVAL OF ROOF DEBRIS.
- B. TAT PERFORMED PHOTO DOCUMENTATION OF SITE TO DEMONSTRATE PRP'S ACTIVITIES SINCE OSC'S LAST INSPECTION. PRP HAS REMOVED CASES OF METHANOL PRODUCTS FROM THE PREMISES.
- C. PRP VERNON HAS STATED TO OSC THAT HE INTENDS TO ARRANGE FOR RECYCLING OF SOLVENTS CONTAINED ON THE FIRST FLOOR OF THE BLDG. WITHIN THE "VISUAL PACKAGING" PORTION OF THE FACILITY. IN ADDITION, HE PLANS TO TRANSPORT THE MANUFACTURED GLUE PRODUCTS TO A FORMER TENNANT AND OWNER OF THE PRODUCTS.

2

D. 24 HOUR SITE SECURITY ESTABLISHED AT 1750 HOURS THIS DATE.

E. MEETING HELD BY OSC, IN ATTENDANCE: OSHA, EPA CERCLA ENFORCEMENT, CITY OF PHILADELPHIA DEPT. OF LIC. AND INSPECTIONS, FIRE MARSHALL'S OFFICE, CITY MANAGING DIRECTORS OFFICE, AND TAT. OSC BRIEFED ATTENDEES ON STATUS OF REMOVAL PLANS AND CURRENT SITE STATUS.

F. CITY MANAGING DIRECTORS OFFICE TO EXPEDITE CONNECTION OF UTILITIES AT EPA COMMAND POST.

III. FUTURE PLANS

A. ERCS TO MOBE IN ON SITE MON. 24 AUGUST, 1987.

B. ERCS TO MOBE IN COMMAND POST AND ARRANGE FOR TEMPORARY POWER, TELEPHONES, AND WATER SUPPLY FOR SITE OPERATIONS AND DECON.

C. TAT TO IMPLEMENT COMPUTER REMOVAL COST MANAGEMENT PROGRAM AND UPDATE SAME.

D. TAT TO ACT AS SITE SAFETY COORDINATORS DURING REMOVAL ACTION.

GARRETT H. ARAI, OSC
US EPA , REGION III
PHILADELPHIA, PA

To: ERD/OERR (EPASS11)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Mon 24-Aug-87 20:02 EDT Sys 16
Subject: BELFIELD AVENUE REMOVAL POLREP 8
Mail Id: IPM-163-870824-180410139

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA REMOVAL ACTION

POLREP #8

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (2000 HOURS, 24 AUGUST, 1987)

- A. PERSONNEL ON SCENE: EPA-2, TAT-3, ERCS-3, PRP-2.
- B. WEATHER: TEMP: 60'S, SUNNY AND WINDY.
- C. BUILDING OWNED BY PRP VANDALIZED ON WEEKEND WHILE GUARD ON DUTY. TENANTS OF PRP REPORTED DAMAGES AND THEFT OF PROPERTY TO CITY POLICE AND OSC.
- D. RECENT VANDALISM NOTED IN OTHER PORTIONS OF THE BUILDING, INCLUDING AREA UNDER CERCLA CLEANUP.
- E. ERCS MOBED IN RM, RT, AND PCT, HOWEVER, UNABLE TO SET UP UP OR PREP SITE AS COMMAND POST WAS NOT DELIVERED AS SCHEDULED AND BIDS WERE NOT SOLICITED FROM ASBESTOS CONTRACTORS.
- F. OSC DISPLEASED WITH ERCS PERFORMANCE THIS DATE AS RM WAS UNPREPARED TO CARRY OUT MOBILIZATION DUE TO LACK OF SUPPORT BY ERCS PROGRAM MANAGEMENT.

II. ACTIONS TAKEN

- A. OSC AND TAT BRIEFED ERCS ON SITE HISTORY AND CURRENT STATUS, REVIEWED SITE SAFETY PLAN AND PERFORMED VISUAL INSPECTION OF SITE AND VANDALIZED AREAS.
- B. ERCS ASBESTOS REMOVAL SUBCONTRACTOR ARRIVED ON SCENE AT 1200 HOURS TO EVALUATE SUSPECT ASBESTOS FOUND ON PIPE INSULATION IN COLLAPSED ROOF AREA OF FACILITY.
- C. ERCS PCT MADE INITIAL ARRANGEMENTS FOR HOOKUP OF POWER AND TELEPHONE. ERCS REQUESTED OSC CONTACT CITY OF PHILADELPHIA TO EXPEDITE PROCESS AS PECC GAVE ESTIMATE OF ONE MONTH TO HOOK UP POWER.
- D. TAT PERFORMED PHOTODOCUMENTATION OF VANDALISM WHICH OCCURRED BETWEEN 1800 HOURS 8/21/87 AND 0600 HOURS 8/24/87.

- E. TAT ON SCENE TO PROVIDE ENGINEERING SERVICES AND RECOMMENDATIONS REGARDING STRUCTURAL INTEGRITY OF DAMAGED AREA OF ROOF AND BLDG, AS WELL AS INSIGHT ON PROPOSED DISMANTLING OF ROOF DEBRIS.
- F. OSC AND TAT LOCATED VITAMIN SUPPLEMENTS AND DIETARY PRODUCTS IN BASEMENT AREA OF FACILITY. PAP REPORTS THAT PRODUCTS HAVE BEEN ABANDONED APPROX. TWO YEARS.
- G. CERAMIC GLAZING PRODUCTS (METALS) WERE ALSO LOCATED IN THE BASEMENT AND REPORTED TO BE OF SAME VINTAGE AS VITAMIN PRODUCTS.

III. FUTURE PLANS

- A. ASBESTOS CONTRACTOR BIDS WILL BE COLLECTED BY ERCS FOR EVALUATION.
- B. ERCS TO ARRANGE FOR COMMAND POST ARRIVAL 25 AUGUST, 1987.
- C. SUSPECT ASBESTOS CONTAINING PIPE INSULATION TO BE SAMPLED BY TAT AND ANALYZED FOR ASBESTOS CONTENT.
- D. SEPTA TO BE CONTACTED REGARDING SITE PROXIMITY TO RAIL LINE.
- E. COMMAND POST COMMUNICATIONS AND TEMPORARY POWER TO BE ESTABLISHED.
- F. BIDS TO BE SOLICITED FOR DEMOLITION CONTRACTOR TO PERFORM NECESSARY WORK ON COLLAPSED ROOF.
- G. ERCS TO INVENTORY MATERIALS WHICH CAN BE SAFELY ACCESSED 8-25-87.

GARRETT H. ARAI, OSC
US EPA, REGION III
PHILADELPHIA, PA

To: ERD/DEAR (EPA5511)
To: T. MASSEY (EPA9374)
From: T. MASSEY (EPA9374) Delivered: Wed 26-Aug-87 13:14 EDT Sys 16
Subject: BELFIELD AVENUE POLREP 9
Mail Id: IPM-163-870826-119190300

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA REMOVAL ACTION

POLREP #9

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1930 HOURS, 25 AUGUST, 1987)

- A. PERSONNEL ON SCENE: EPA-2, TAT-2, ERCS-3, PRP-2.
- B. WEATHER: TEMP: 70'S, SUNNY AND WINDY.
- C. PINKERTON SECURITY REPORTED AN INTRUDER IN THE FACILITY AT 2100 HOURS ON 24 AUGUST, 1987. DUE TO THE LACK OF COMMUNICATIONS ON SITE, PINKERTON GUARD WAS UNABLE TO ALERT PHILA POLICE DEPT. THE NEAREST TELEPHONE IS LOCATED APPROX. SIX BLOCKS FROM SITE.
- D. PRP (VERNON) OFFERED TO SHARE AN OFFICE SPACE WITHIN TENANTS PORTION OF THE BUILDING TO SERVE AS A COMMAND POST. OSC ARAI DETERMINED THAT IT WOULD BE INAPPROPRIATE TO CONDUCT USEPA BUSINESS IN SUCH A MANNER (WITH PRP PRESENT) AND DECLINED VERNON'S OFFER.
- E. MARK OSTRANDER, EPA, FAS ON SCENE TO ASSIST WITH REMOVAL COST MANAGEMENT PROGRAM IMPLEMENTATION.
- F. ESTIMATED COSTS AS OF CDB 8-24-87:

AGENCY	TO DATE	CEILING
EPA	\$ 700	\$ 30K
ERCS	4,076	250K
TAT	2,490	60K
HQ	1,089	126K
TOTALS	8,355	466K

PROJECT CEILING 1,026,000

II. ACTIONS TAKEN

- A. AT 1130 HOURS (GUARD SHIFT CHANGE) PHILADELPHIA POLICE DEPT. WAS NOTIFIED OF INTRUDER INCIDENT WHICH OCCURRED. AT 0900 HOURS THIS DATE, LT. CLISBE, PHILA. P.D. STATED TO OSC THAT PPD COULD NOT PROVIDE PATROL SERVICES FOR SITE SECURITY.

- B. COMMAND POST MOVED IN 0900 HOURS THIS DATE. COMMUNICATIONS CANNOT BE ESTABLISHED UNTIL THURS, 8-27-87.
- C. AT OSC REQUEST AT 1100 HOURS THIS DATE, JOHN HADALSKI, CITY MANAGING DIRECTORS OFFICE, REPORTED TO OSC THROUGH FAS HENRY THAT PHILA. POLICE DEPT. WOULD PROVIDE A PATROLMAN TO ACT AS STANDBY WITH PINKERTON SECURITY GUARD FROM 1700 HOURS UNTIL 0800 HOURS TUES, WED, AND POSSIBLY THURSDAY, 8-27-87, AT WHICH TIME COMMAND POST COMMUNICATIONS CAN BE ESTABLISHED. AS OF 1830 HOURS THIS DATE, NO PHILA. POLICE DEPT. PERSONNEL WERE ON SCENE.
- D. TWO ASBESTOS REMOVAL CONTRACTORS ASSESSED THE SITE. DUALL, INC. REP. ROBERT BARTLES STATED THAT NO BID WOULD BE SUBMITTED UNTIL WALLS ARE SHORED UP OR A WAIVER SIGNED BY OSC FOR RESPONSIBILITY OF HIS WORKER SAFETY. OSC WILL ACCEPT NO SUCH LIABILITY. THIS RESPONSIBILITY BELONGS TO THE ERCS CONTRACTOR. THE BENTLY CONTRACTING CO. WILL FINALIZE THEIR BID ON 8-26-87 BUT CANNOT START FOR ONE WEEK OR UNTIL PROPER NOTIFICATIONS CAN BE ESTABLISHED TO AUTHORITIES.
- E. ERCS INITIATED INVENTORY OF SAFELY ACCESSIBLE CONTAINERS.
- F. PINKERTON SECURITY GUARD SERVICE REPORTED FOR DUTY ONE HOUR 10 MIN LATE. ERCS TO OBTAIN A DIFFERENT SECURITY SERVICE.
- G. OSC CONTACTED HQ, PO (DIZUBIAN) TO DISCUSS PROBLEMS ENCOUNTERED IN OBTAINING ASBESTOS REMOVAL SUBCONTRACTORS. OSC IS VERY CONCERNED THAT ERCS COSTS ARE RISING WITH LITTLE ACCOMPLISHED.

III. FUTURE PLANS

- A. OSC WILL NOT BE ON SITE 8-26-87 AND 8-27-87 DUE TO MANDATORY ATTENDANCE AT SAFETY MEETINGS HELD ON THESE DATES.
- B. OSC DIRECTS ONE TAT PERSONNEL ON SITE DURING THESE SAFETY MEETINGS.
- C. ERCS TO COMPLETE INVENTORY OF SAFELY ACCESSIBLE MATERIALS WITHIN BUILDING.
- D. ERCS TO SECURE FINAL TWO BIDS FROM ASBESTOS REMOVAL CONTRACTORS 8-26-87.
- E. ERCS TO SECURE DEMOLITION CONTRACTOR BIDS. CLEVELAND WRECKING TO ASSESS ROOF DAMAGE 8-26-87.
- F. ERCS TO ESTABLISH COMMUNICATIONS. TENTATIVELY SCHEDULED FOR HOOK UP 8-27-87.
- G. ERCS TO FINALIZE ARRANGEMENTS FOR ELECTRICAL SERVICE INSTALLATION WITH PECO.

100150

GARRETT H. ARAI, OSC
US EPA, REGION III
PHILADELPHIA, PA

To: ERD/DERR (EPA5511)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Thu 27-Aug-87 17:15 EDT Sys 16
Subject: BELFIELD AVENUE REMOVAL POLREP 10
Mail Id: IPM-163-870827-155360180

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA REMOVAL ACTION

POLREP #10

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1900 HOURS, 26 AUGUST, 1987)

- A. PERSONNEL ON SCENE: EPA-1, TAT-2, ERCS-3, PRP-4.
- B. WEATHER: TEMP: 70'S, SUNNY.
- C. OSC ARAI OFF SITE THIS DATE DUE TO MANDATORY PRESENCE AT SAFETY MEETING.
- D. AN INTRUDER REPORTEDLY GAINED ACCESS INTO THE BUILDING EVENING OF 8-25-87. PINKERTON GUARD REPORTED INCIDENT TO PHILA. POLICE DEPT. WHO APPREHENDED SUSPECT AT OR ABOUT 2300 HOURS 8-25-87. SUSPECT WAS IN CUSTODY AT THAT TIME AND PHILA. POLICE DEPT. NOTIFIED ERCS RM OF INCIDENT. PRP INFORMED OF INCIDENT BY ERCS RM AT 0900 HOURS THIS DATE.
- E. BILL STEUTEVILLE, EPA, CRES, ON SCENE ON THIS DATE TO OFFER OSC ARAI ASSISTANCE IF NEEDED AND TO ASSESS PRP PROGRESS TO DATE.
- F. ESTIMATED COSTS TO DATE:

AGENCY	TO DATE	CEILING
EPA	\$ 745	\$ 30K
ERCS	5,275	250K
TAT	3,390	60K
HQ	1,411	126K
TOTALS	10,821	466K

PROJECT CEILING 1,026,000

- G. PRP REMOVED LIGHTS REMOVED FROM CIELING IN AREA ADJACENT TO COLLAPSED ROOF AREA USING A FORK LIFT TRUCK.

II. ACTIONS TAKEN

- A. ERCS COMPLETED INVENTORY OF DRUMS/CONTAINERS WHICH COULD BE SAFELY ACCESSED.
- B. TAT PERFORMED PHOTO DOCUMENTATION AND CONTRACTOR MONITORING.
- C. BELL OF PA ON SCENE TO LOCATE NEAREST TELEPHONE LINE AND PREP FOR TELEPHONE INSTALLATION; ALSO STATED THAT THEY WOULD REQUIRE A 12' X 4" X 4" POLE BE PLACED ADJACENT TO THE WEST END OF COMMAND POST TO ACT AS A HANGAR FOR THE TELEPHONE LINES.
- D. ROBERT HAWTHORNE INC. INSPECTOR ON SCENE TO DRAFT BID FOR WORK TO BE DONE ON COLLAPSED ROOF.
- E. BENTLY INC AND FALCON INC. ASBESTOS REMOVAL CONTRACTORS WERE ON SCENE TO DRAFT BIDS FOR ASBESTOS REMOVAL. BENTLY REQUESTED WRITTEN VERIFICATION FROM US EPA THAT EMPLOYEES PERFORMING ASBESTOS REMOVAL WOULD NOT BE EXPOSED TO ANY OTHER TYPE OF HAZARDOUS MATERIALS DURING THE REMOVAL OPERATIONS. FALCON INC. HAD NOT PROVIDED ERCS WITH A BID AS OF 1730 HOURS THIS DATE.
- F. ERCS NOTIFIED PINKERTON SECURITY THAT THEY WOULD BE TERMINATED IF GUARDS CONTINUED TO ARRIVE LATE. ERCS HAS ALTERNATE SECURITY SERVICES AVAILABLE.
- G. PRP REPORTS THAT HE IS CONTINUING TO IDENTIFY ARRANGE FOR MATERIALS TO BE MOVED OFF SITE. PRP ALSO STATED THAT HE IS MOVING HIS BUSINESS OPERATIONS.
- H. VERBAL RESULTS RECEIVED 1330 HOURS THIS DATE FOR SUSPECT ASBESTOS PIPE INSULATION SAMPLES COLLECTED 8-25-87. DATA INDICATES SAMPLES WERE APPROX. 48% ASBESTOS.
- I. ERCS INSTALLED A NEW LOCKING DOOR KNOB ON AN ACCESS DOOR TO THE FACILITY (TANGIBLE CONCEPTS ENTRY) BECAUSE DOOR WAS AGAIN FOUND OPEN UPON MORNING INSPECTION THIS DATE.
- J. ELECTRICAL CONTRACTOR, EPS INC., ON SCENE TO BID FOR COMMAND POST ELECTRICAL HOOKUP.

III. FUTURE PLANS

- A. OSC TO BE OFF SITE 8-27-87 DUE TO MANDATORY PRESENCE AT REGIONAL SAFETY MEETING.
- B. DUALL INC (ASBESTOS CONTRACTORS) TO ARRIVE ON SITE 0800 HOURS 8-27-87 TO INITIATE ASBESTOS REMOVAL FROM PIPE COVERINGS AND SURROUNDING AREAS.

- C. HAWTHORNE DEMOLITION CREW TO BE ON SCENE 0800 HOURS 8-27-87 TO INITIATE REMOVAL OF COLLAPSED ROOF AND DEBRIS. HAWTHORNE DEMOLITION TO WORK SIMULTANEOUSLY WITH DWALL INC. IN ORDER TO MITIGATE PHYSICAL HAZARDS FOR ASBESTOS REMOVAL CREW.
- D. COMMAND POST COMMUNICATIONS SCHEDULED TO BE ESTABLISHED MORNING OF 8-27-87. ERCS TO CONSTRUCT 12 FOOT 4X4 POLE TO BE PLACED AT WEST END OF COMMAND POST AT REQUEST OF BELL OF PA. POLE WILL BE UTILIZED TO HANG TELEPHONE LINES.
- E. ERCS TO FINALIZE ARRANGEMENTS WITH EPS INC. AND PECO REGARDING COMMAND POST POWER HOOKUP. CITY OF PHILA. INSPECTION PROCEDURES AND PECO CAUSING DELAYS IN PROCURING POWER FOR CP.
- F. GERALD HESTON, DPO, AND VINCE ZENONE, OSC, WILL BE ON SCENE 8-28-87 TO EVALUATE ASBESTOS REMOVAL PROCEDURES AND SITE SAFETY PRECAUTIONS.

GARRETT H. ARAI, OSC
US EPA, REGION III
PHILADELPHIA, PA

To: ERD/DEAR (EPA5511)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Thu 27-Aug-87 17:19 EDT Sy
Subject: BELFIELD AVENUE REMOVAL POLREP 11, SPECIAL BULLETIN A
Mail Id: IPM-163-870827-155850809

BELFIELD AVE SITE
PHILADELPHIA, PHILADELPHIA CO, PA.
CERCLA/SARA EMERGENCY REMOVAL

ATTN: TOM MASSEY AND TIM FIELDS

POLREP #11 SPECIAL BULLETIN A-

I. SITUATION: (1730 HRS 8/26/87)

THREE WORKING DAYS (AUGUST 24 TO AUGUST 26) HAVE LAPSED SINCE THE BELFIELD AVENUE PROJECT BEGAN. OHM HAS BEEN UNABLE TO SUPPLY AN ASBESTOS CONTRACTOR TO REMOVE ASBESTOS FROM THE PIPES ON SITE. THIS TASK WAS TO BE COMPLETED MONDAY, AUGUST 24, 1987. THE ASBESTOS MUST BE REMOVED PRIOR TO STARTING REMOVAL ACTIVITIES. DUE TO THE FIRE, THE ROOF OF THE BUILDING COLLAPSED ON THE BULK OF THE HAZARDOUS MATERIALS. THE PIPES WERE ATTACHED TO THE ROOF AND ARE NOW SUSPENDED IN DIFFERENT DIRECTIONS AS A RESULT. A PORTION OF THE COLLAPSED ROOF MUST BE REMOVED TO GAIN ACCESS TO THE DAMAGED CONTAINERS LOCATED UNDER THE ROOF. TO DATE, LIMITED ACTIONS HAVE BEEN PROVIDED BY THE CONTRACTOR AND REMOVAL ACTIVITIES HAVE NOT BEGUN.

II. ACTIONS TAKEN

OSC ARAI MET WITH ERS MASSEY, DPO HESTON, COLLEEN CARRUTHERS, JACKIE DIZUBIAN, EPA HDQTS, AND EPA CONTRACT OFFICER DICK MUELLER VIA TELEPHONE REGARDING THE LEVEL OF EFFORT FOR WORK COMPLETED TO DATE BY OHM. OSC FEELS OHM SEVERELY LACKING IN PERFORMANCE AS DIRECTED.

THIS MEETING WAS HELD TO SEEK A SOLUTION TO THE PROBLEM. OSC ARAI AGREED THAT IF ERC'S COULD NOT PROVIDE PERSONNEL REQUESTED TO BEGIN ACTIVITIES A CURE NOTICE WOULD BE ISSUED. HQ WOULD SUPPORT WITH AN ALTERNATIVE CONTRACTOR. HQ ASKED IF OH COULD HAVE A CONTRACTOR ON SITE BY 0800 HRS. THURS. WOULD THIS BE ACCEPTABLE? OSC AGREED, HOWEVER, THEY MUST BE ABLE TO PERFORM WORK BY MORNING, THUR, AUGUST 27, 1987.

A FOLLOW-UP CALL WAS PLACED BY JOHN COPUS OF OHM TO OSC ARAI AND MASSEY AT 1350 HRS. OSC REQUESTED A RESPONSE BY 1600 HRS. WED. AS TO WHETHER THEY CAN SUPPLY A CONTRACTOR BY 0800 HRS. THURS.

AT 1600 HRS ON THIS DATE TONY LILLIE (OHM) CONTACTED OSC TO VERIFY THAT AN ASBESTOS CONTRACTOR (DUVALL) WILL BE ON SCENE AT

0800 HRS. TO BEGIN ASBESTOS REMOVAL ACTIVITIES. A VIABLE CONCERN WAS RAISED OF THE STRUCTURAL INTEGRITY OF THE BUILDING WALLS AND ROOF. DEMOLITION OF THE ROOF MAY HAVE TO OCCUR CONCURRENTLY AS ASBESTOS IS REMOVED. THIS IS AN INHERENT RESPONSIBILITY OF THE PRIME CONTRACTOR.

III. FUTURE PLANS

1. OHM WILL CONTINUE AS CONTRACTOR FOR THIS REMOVAL ACTIVITY PENDING THE INITIATION OF REMOVAL ACTIONS AT 0800 HRS 8/27/87.
2. REGIONAL ASBESTOS REMOVAL EXPERT OSC ZENONE WILL ASSESS SITE WITH REGARD TO ASBESTOS REMOVAL.
3. OSC HESTON TO BE ON SCENE TO ASSIST SITE CONSIDERATIONS FOR SITE SAFETY MATTERS.
4. FAS HENRY TO RESOLVE COSTS REPORTED ON DAILIES TO DATE. COST FOR WORK (LEVEL OF EFFORT) FROM AUGUST 24, 1987 TO AUGUST 26, 1987 IS BEING QUESTIONED.

GARRETT H. ARAI
ON SCENE COORDINATOR
USEPA REGION III
PHILA, PA.

To: ERD/DERR (EPA5511)
To: T. MASSEY (EPA9374)
From: T. MASSEY (EPA9374) Delivered: Mon 21-Aug-87 12:36 EDT Sys
Subject: POLREP #12 BELFIELD AVE. SITE
Mail Id: IPM-163-B70831-113460748

BELFIELD AVENUE SITE
PHILADELPHIA, PHILA. COUNTY, PA
CERCLA/SARA REMOVAL ACTION

POLREP #12

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (2200 HOURS 27 AUGUST, 1987)

A. PERSONNEL ON SCENE: TAT-3; ERCS-8; ERCS
SUBCONTRACTORS: DWALL, INC-5; ROBERT HAWTHORNE,
INC.- 5; S.T. HUDSON ENGINEERS-1; CAGLEY & HARMAN
ENGINEERS-1; EPS INC.-1.

B. ESTIMATED COSTS TO DATE AS OF AUGUST 26, 1987:

AGENCY	CURRENT	CEILING
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EPA	\$ 750	\$ 30K
TAT	4,239	60K
ERCS	6,730	250K
HQ	1,758	126K
TOTALS	13,477	466K

TOTAL PROJECT CEILING IS \$1,066,000.

C. TEMPORARY COMMAND POST COMMUNICATIONS ESTABLISHED AT
0800 HOURS THIS DATE, HOWEVER MOBILE CELLULAR PHONE
POWER SOURCE FAILED PRIOR TO INSTALLATION OF BELL
TELEPHONE LINES. CP COMMUNICATIONS WERE ESTABLISHED
AT 1500 HOURS. BELFIELD AVE SITE C.P. TELEPHONE
NUMBER IS (215) 848-6636.

D. OSC ARAI OFF SITE THIS DATE TO ATTEND REGIONAL SAFETY
MEETING.

E. TAT PERSONNEL ACTING AS SITE SAFETY OFFICER.

F. ERCS SUBCONTRACTORS ON SCENE FOR START UP OF ASBESTOS
REMOVAL OPERATIONS AND DISMANTLING OF COLLAPSED ROOF.

II. ACTIONS TAKEN

A. ERCS AND ERCS SUBCONTRACTORS INITIATE DEMOLITION OF
ROOF AND SET UP FOR REMOVAL OF ASBESTOS PRIOR TO
ESTABLISHING COORDINATION OF SUBCONTRACTOR OPERATIONS.

SUB CONTRACTOR PERSONNEL STATED TO TAT PERSONNEL THAT THEY WERE UNAWARE OF THE PRESENCE OF HAZARDOUS MATERIALS ON SITE.

- B. TAT RECOMMENDED TO ERCS RM THAT SAFETY MEETING BE HELD WITH ALL PERSONNEL ON SCENE AS PREVIOUSLY DIRECTED BY OSC ARAI, AND THAT DEMOLITION OPERATION BE STOPPED UNTIL OSC ARAI COULD BE BRIEFED ON ALL OPERATIONS THAT WERE TO OCCUR AND CURRENT SITE STATUS.
- C. DEMOLITION OPERATIONS WERE INITIATED BY ERCS. ERCS DID NOT ENGAGE THE SERVICES OF A STRUCTURAL ENGINEER TO ADVISE ON DEMOLITION METHODOLOGY AS PREVIOUSLY DIRECTED BY THE OSC.
- D. TAT OBSERVED PERSONNEL SMOKING IN THE BLDG., MOVING CONTAINERS OF UNKNOWN MATERIALS, AND INITIATING DEMOLITION OF ROOF (FROM ROOF) WHILE PERSONNEL WERE INSIDE THE BLDG ON THE MAIN FLOOR SETTING UP FOR ASBESTOS REMOVAL OPERATIONS.
- E. SITE SAFETY OFFICER DIRECTED ERCS RM TO EVACUATE ALL PERSONNEL FROM THE BUILDING AND ASSEMBLE FOR SAFETY MEETING 0840 HOURS. ALL PERSONNEL ASSEMBLED FOR MEETING EXCEPT THOSE WORKING ON CP POWER AND TELEPHONE INSTALLATION.
- F. TAT BRIEFED OSC ARAI ON ALL ACTIONS TAKEN VIA MOBILE PHONE. OSC DIRECTED TAT AND ERCS TO CEASE ALL OPERATION UNTIL ERCS MOVED IN A STRUCTURAL ENGINEER TO COORDINATE OPERATIONS AND SUBCONTRACTORS AND PROVIDE A WORK PLAN OUTLINING THE SEQUENCE THAT EACH CONTRACTORS ACTIONS ARE TO BE INITIATED IN. THE WORK PLAN IS TO INCLUDE A GENERAL SCOPE OF WORK FOR EACH RESPECTIVE CONTRACTOR.
- G. ERCS CONSTRUCTED A UTILITY POLE ADJACENT TO WEST END OF COMMAND POST.
- H. ASBESTOS CREW BEGAN SETTING UP AND PREPPING SITE FOR ASBESTOS REMOVAL.
- I. ERCS MOVED IN TWO CERTIFIED INDUSTRIAL HYGIENISTS.
- J. TAT INFORMED OSC VIA PAY TELEPHONE OF SPECIFIC SAFETY VIOLATIONS MENTIONED IN ACTION ITEM D, THAT STRUCTURAL ENGINEER WAS NOT ON SCENE, THAT NO EFFORTS TO COORDINATE CONTRACTOR ACTIVITIES OR THEIR REPRESENTATIVES HAD YET OCCURRED. AFTER CAREFUL DELIBERATIONS WITH ERS CHIEF MASSEY OSC ARAI SUBSEQUENTLY ESTABLISHED COMMUNICATIONS WITH ERCS RM VIA CELLULAR MOBILE PHONE ON SITE (1130 HOURS) AND DIRECTED ERCS TO SHUT DOWN ALL SITE OPERATION THIS DATE EXCEPT THOSE DIRECTLY CONCERNED WITH ESTABLISHING COMMAND POST COMMUNICATIONS AND POWER.

- K. ERCS RM DISMISSED ALL SUBCONTRACTORS AS DIRECTED BY OSC ARAI AT 1140 HOURS THIS DATE. ELECTRICAL CONTRACTOR AND BELL OF PA REMAINED ON SCENE.
- L. TWO STRUCTURAL ENGINEERS WERE PROCURED BY ERCS. OHM, FINDLAY, CH REQUESTED THE SERVICES OF CAGLEY & HARMON ENGINEERING, AND ERCS RM SIMULTANEOUSLY SECURED S.T. HUDSON ENGINEERING. S.T. ENGINEERING REP ARRIVED ON SCENE AT APROX. 1215. ERCS RM NOTIFIED CAGLEY & HARMON ENGINEERING THIER SERVICES WERE NOT REQUIRED AT 1230 HOURS WHEN THIER REP ARRIVED ON SCENE.
- M. TAT PERFORMED CONTRACTOR MONITORING, PHOTODOCUMENTATION, AND CONTRACTOR COST MONITORING.
- N. S.T. HUDSON ENGINEER, TAT, AND ERCS RM ACCOMPANIED BY OHM PROJECT MGT PERSONNEL INSPECTED ROOF AT AREA OF COLLAPSE.
- O. ERCS MOBED IN TRASH DUMPSTER AND ARRANGED FOR TRASH SERVICE AT 1400 HOURS.
- P. TAT CONSULT WITH S.T. HUDSON ENGINEER TO EVALUATE PROPOSED ACTIONS TO BE TAKEN ON COLLAPSED ROOF AND SAFETY PRECAUTIONS REQUIRED PRIOR TO INITIATING ANY DEMOLITION OPERATIONS.
- Q. AT 1500 HOURS OSC DIRECTED TAT TO STAND DOWN AS ALL ERCS PERSONNEL HAD BEEN PREVIOUSLY DIRECTED TO CEASE ALL OPERATIONS AND PREPARE FOR A MEETING AT REGION III TAT OFFICE . MEETING WAS TO CONVENE AT 2000 HOURS AND ERCS AS WELL AS ERCS SUBCONTRACTORS WERE TO HAVE PROPOSAL OF PROJECT AND SCOPE OF WORK READY TO SUBMIT TO OSC ARAI FOR WORK TO BE INITIATED 08-28-87.
- R. TAT SECURED CONTRACT EQUIPMENT AND DEMOED FROM SITE 1520 HOURS TO MEET WITH OSC ARAI.
- S. AT 2000 HOURS THIS DATE SITE MEETING CONVENED AT REGION III TAT OFFICE. THE FOLLOWING PERSONNEL WERE IN ATTENDANCE:
- EPA-1
TAT-3
ERCS-5
ERCS SUBS-4
- T. ERCS PROPOSED THAT WALLS BE SHORED AND THAT STEEL TRUSSES BE BRACED STRATEGICALLY AS SPECIFIED BY THEIR STRUCTURAL ENGINEER PRIOR TO THE INITIATION OF ANY OTHER OPERATIONS. ERCS PROPOSED THAT DEMO CONTRACTOR PERFORM ONLY DEMO OPERATIONS REMOTE TO ANY HAZARDOUS MATERIALS AND THAT OHM PERSONNEL PERFORM THE REMAINDER OF WORK IN THE APPROPRIATE LEVEL OF

PROTECTION. ERCS INDICATED TO OSC ARAI THAT A SUBSEQUENT MEETING WAS TO BE HELD WITH THEIR SUBCONTRACTORS TO FINALIZE WORK PLANS AND COORDINATION OF ALL CONTRACTORS AND PERSONNEL ON SCENE.

- U. OSC ARAI AND ALL PERSONNEL IN ATTENDANCE AGREED TO PRELIMINARY DISCUSSIONS. MEETING ADJOURNED AT 2130 HOURS.

III. FUTURE PLANS

- A. ERCS AND ERCS SUBCONTRACTORS TO MEET ON SITE TO FINALIZE WORK PLAN AND BRIEF PRP ON ACTIONS TO BE TAKEN AT 0800 HOURS 08-28-87.
- B. ERCS STRUCTURAL ENGINEER TO SUBMIT FINALIZED WORK PLAN AND DETAILS OF SHORING AND BRACING PLACEMENTS.
- C. ERCS TO ESTABLISH COMMAND POST POWER HOOK UP.
- D. ERCS TO INITIATE SHORING AND BRACING OPERATIONS AS SPECIFIED BY STRUCTURAL ENGINEER AND APPROVED BY OSC ARAI.
- E. ERCS TO COMPLETE SET UP OF COMMAND POST AND PROVIDE GENERATOR UNTIL POWER CAN BE HOOKED UP BY PECC.
- F. ERCS TO MOBE IN ADDITIONAL PERSONNEL AS REQUIRED TO EFFECT COMPLETION OF SHORING OPERATIONS.
- G. ASBESTOS REMOVAL TENTATIVELY SCHEDULED TO BEGIN 08-31-87 AT 0800 HOURS.
- H. ERCS TO CONTINUE GENERAL SITE PREP AND CLEANUP OPS AS DIRECTED BY OSC.

GARRETT H. ARAI, OSC
US EPA REGION III
PHILADELPHIA, PA

To: ERD/GERR (EPASS11)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Mon 31-Aug-87 13:32 EDT Sys 16
Subject: POLREP #13 BELFIELD AVE.
Mail Id: IPM-163-870831-121940162

BELFIELD AVE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA/SARA REMOVAL ACTION

POLREP #13

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (2000 HOURS 28 AUGUST, 1987)

- A. PERSONNEL ON SCENE: EPA-3; TAT-4; ERCS-6; CITY OF PHILADELPHIA-1.
- B. WEATHER: INTERMITTENT RAINS, HEAVEY AT TIMES. TEMPS IN MID 70'S.
- C. ESTIMATED COSTS AS OF 08-27-87:

AGENCY	CURRENT	CEILING
EPA	\$ 750	\$ 30K
TAT	5,000	60K
ERCS	7,500	250K
HQ	1,988	126K
TOTALS	15,238	466K

TOTAL PROJECT CEILING: \$1,026,000.

- D. JERRY HESTON, OSC, DPO, ON SCENE THIS DATE TO EVALUATE SITE SAFETY PLAN AND PROVIDE RECOMMENDATIONS TO SITE SAFETY OFFICER FOR FURTHER DEVELOPMENT OF PLAN.
- E. MARC OSTRANDER, US EPA, FAS ON SCENE TO ASSIST WITH CONTRACTOR COST MONITORING.

II. ACTIONS TAKEN

- A. ERCS INITIATED SHORING OPERATIONS; TWO BRACES WERE COMPLETED, HOWEVER ORIGINAL ESTIMATE ON AMOUNT OF LUMBER REQUIRED TO COMPLETE JOB WERE INADEQUATE AND OPERATIONS STOPPED AT 1730 AS LUMBER YARD WAS CLOSED FOR THE DAY.
- B. ERCS STRUCTURAL ENGINEER PROVIDED OSC WITH WRITTEN PLAN RELATIVE TO SCOPES OF CONTRACTOR WORK DISCUSSED AT SITE MEETING HELD 08-27-87.

100160

- C. PRP (VERNON) WAS INFORMED OF WORK PLANS AND METHODOLOGY TO BE UTILIZED FOR DISMANTLING OF ROOF AND REMOVAL OF ASBESTOS. VERNON'S INTEREST AS A STRUCTURAL ENGINEER WAS IN SAFETY, AND METHODOLOGY OF DEMOLITION.

- D. PAP (VERNON) DECLINED TO USE PERSONAL PROTECTIVE GEAR WHEN ENTERING THE BLDG, AND TO SIGN SITE SAFETY PLAN.
- E. VERBAL ANALYTICAL DATA ON CONTENT OF AIRBORNE ASBESTOS IN THE BLDG WAS RECEIVED AT 1500 HOURS THIS DATE; AIR QUALITY WAS REPORTED TO BE WELL BELOW DETECTION LIMITS FOR ASBESTOS.
- F. BASED ON ABOVE ANALYTICAL RESULTS OSC ARAI DOWNGRADED PROTECTION FOR SHORING OPS TO LEVEL D.
- G. OSC JERRY HESTON, DPO RECOMMENDED OPENING THE WEST DOOR OF THE BLDG DURING BUSINESS HOURS (DOOR THAT ERCS SECURED DUE TO BREAK-INS) IN ORDER TO HAVE BETTER MEANS FOR EMERGENCY EGRESS DURING OPERATIONS WITHIN THE BLDG. ERCS OPENED THE DOOR AT 1430 HOURS.
- H. WILLIAM ZIMMERMAN, CITY OF PHILA., ASBESTOS CONTRL UNIT ON SCENE TO OFFER OSC ASSISTANCE FROM HIS OFFICE. HE EXPRESSED SATISFACTION WITH OSC'S PLANS REGARDING ASBESTOS REMOVAL AND STATED THAT HIS OFFICE COULD RESPOND WITHIN APPROX ONE HOUR IF ASSISTANCE WAS REQUESTED.
- I. OSC CONTINUES WORKING WITH JOHN HADALSKI AND PCO REGARDING POWER FOR COMMAND POST. JOHN HADALSKI REQUESTED THAT HIS OFFICE BE PROVIDED WITH DAILY POLREPS.
- J. ERCS MADE MINOR ADJUSTMENT FROM STRUCTURAL ENGINEER'S ORIGINAL DESIGN FOR BRACING OF ONE TRUSS, HOWEVER, ENGINEER'S APPROVAL WAS SOUGHT PRIOR TO MAKING ADJUSTMENTS.
- K. TAT PERFORMED PHOTO DOCUMENTATION, SITE MONITORING, CONTRACTOR COST MONITORING.

III. FUTURE PLANS

- A. TAT TO UPDATE SITE SAFETY PLAN AS DISCUSSED WITH JERRY HESTON, OSC, DPO.
- B. ERCS TO COMPLETE BRACING AND SHORING OPS PRIOR TO INITIATION OF ASBESTOS REMOVAL OPS.
- C. TAT AND ERCS ENGINEERS TO PROVIDE STRUCTURAL EVALUATION OF ERCS SHORING AND BRACING AT 0800 HOURS 08-31-87.
- D. TAT ASD TO BE ON SCENE 08-31-87 TO EVALUATE START UP OF ASBESTOS REMOVAL OPS AND SET UP FOR CONTINUOUS AIR MONITORING AS REQUESTED BY OSC.
- E. ERCS TO OBTAIN ADDITIONAL BIDS FOR ROOF DEMOLITION (AT REDUCED SCOPE OF WORK AS OHM TO PERFORM SOME OF WORK AS NECESSARY DUE TO PROXIMITY OF HAZ. MATERIAL.) 8/31/87
- F. 24 HOUR SECURITY TO BE ESTABLISHED THROUGHOUT WEEKEND.
- G. ERCS TO ESTABLISH POWER FOR COMMAND POST.

GARRETT ARAI, OSC
US EPA REGION III
PHILADELPHIA, PA

100161

To: ERD/OERR (EPASS11)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Tue 1-Sep-87 12:35 EDT Sys 163
Subject: BELFIELD AVE POLREP #14
Mail Id: IPM-163-870901-113350865

BELFIELD AVE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA/SARA REMOVAL ACTION

POLREP #14

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (2000 HOURS 31 AUGUST, 1987)

A. PERSONNEL ON SCENE: EPA-3; TAT-4; ERCS-6; CITY OF PHILADELPHIA-1; DOL/OSHA-2; ERCS SUBS-3.

B. WEATHER: SUNNY AND MILD, TEMPS IN THE 80'S.

C. ESTIMATED COSTS AS OF 08-30-87:

AGENCY	CURRENT	CEILING
EPA	\$ 1,001	\$ 30K
TAT	7,190.	60K
ERCS	13,700	250K
HQ	3,284	126K
TOTALS	25,175	466K

TOTAL PROJECT CEILING: \$1,026,000.

D. OSHA ON SCENE THIS DATE TO EVALUATE SITE SAFETY. OSHA RECOMMENDED TO OSC THAT A GAS CAN FROM ONE OF THE CONTRACTORS NOT BE USED ON THE SITE AS IT DID NOT HAVE A SPRING LOADED VALVE FLAP OR VENT CAP. IN ADDITION IT WAS RECOMMENDED THAT A HANDRAIL BE CONSTRUCTED ON THE EAST PERIMETER OF LOADING DOCK AREA.

E. MARC OSTRANDER, US EPA, FAS ON SCENE TO MAINTAIN CONTRACTOR COST MONITORING (ICL), AND FILES.

F. PHIL YOUNIS, USEPA, OSC ON SITE TO PROVIDE SUPPORT TO OSC ARAI.

II. ACTIONS TAKEN

A. MORNING SAFETY MEETING HELD REVIEWING SCOPE OF WORK.

B. STRUCTURAL ENGINEER APPROVED OF SHORING OPERATIONS COMPLETED BY ERCS.

C. ERCS PERSONNEL CONSTRUCTED HAND RAILING AROUND LOADING DOCK AREA AS RECOMMENDED BY OSHA INSPECTOR.

100162

- D. TAT COLLECTED DUST SAMPLES FROM FLOOR OF WOODWORKING ROOM WITH COLLAPSED ROOF. SAMPLES WILL BE ANALYZED FOR METAL AND ASBESTOS CONTENT BY WASTEX LABORATORIES.
- E. TAT RSO (BHUPI KHONA) ON SCENE TO EVALUATE START UP OF ASBESTOS REMOVAL OPERATIONS AND SITE SAFETY.
- F. ABOVE MENTIONED GAS CAN WAS REMOVED FROM SITE.
- F. ERCS CHANGED SECURITY SERVICE DUE TO RECENT OCCURRENCE OF THEFT OF OBJECTS FROM WITHIN THE BUILDING, AND COMMAND POST.
- G. TAT CONTINUES TO ACT AS SITE SAFETY OFFICER, PERFORM CONTRACTOR COST MONITORING, PHOTO DOCUMENTATION, AND SITE MONITORING.

III. FUTURE PLANS

- A. ASBESTOS REMOVAL OPERATIONS TO BE INITIATED 0700 HOURS 09-01-87, AND TO BE COMPLETED ON SAME DATE.
- B. OSHA TO BE ON SCENE TO MONITOR SITE ACTIVITIES DURING ASBESTOS OPERATIONS.
- C. POWER TO BE INSTALLED.
- D. BIDS FOR DEMOLITION OF ROOF TO BE OBTAINED PRIOR TO START OF ROOF REMOVAL.
- E. SAFETY PLAN TO BE UPDATED AS APPLICABLE TO PROBLEMS ENCOUNTERED ON SITE.
- F. DUE TO DUST PROBLEM ON THE SITE A RAM UNIT TO BE MOBILIZED TO MONITOR PARTICULATE EMISSIONS AND WORKER SAFETY IN APPROPRIATENESS TO LEVEL OF PROTECTION.

GARRETT ARAI, OSC
US EPA, REGION III
PHILADELPHIA, PA

100163

To: ERD/DERR (EPA5511)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Thu 3-Sep-87 14:12 EDT Sys 163
Subject: BELFIELD AVE POLREP #15
Mail Id: IPM-163-870903-127850577

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA REMOVAL ACTION

POLREP #15

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1700 HOURS, 1 SEPTEMBER, 1987)

- A. PERSONNEL ON SCENE: EPA-2, TAT-3, ERCS-3, PAP-1, OSHA-2.
- B. WEATHER: TEMP: 70'S, SUNNY.
- C. ASBESTOS REMOVAL CONTRACTOR (DUALL INC.) ON SITE TO BEGIN ASBESTOS REMOVAL.
- D. OSHA REPS. ON SITE TO MONITOR ASBESTOS REMOVAL CREW.
- E. ELECTRICAL CONTRACTOR ON SITE TO WIRE COMMAND POST FOR POWER.
- F. ESTIMATED COSTS TO DATE:

AGENCY	TO DATE	CEILING
EPA	\$ 1,534	\$ 30K
ERCS	12,900	250K
TAT	8,466	60K
HQ	4,000	126K
TOTALS	30,900	466K

PROJECT CEILING 1,026,000

II. ACTIONS TAKEN

- A. ASBESTOS REMOVAL CONTRACTOR (DUALL INC.) COMPLETED REMOVAL OF ASBESTOS CONTAINING MATERIALS.
- B. AFTER CONVERSATIONS WITH ERT CIBULSKIS AND OHM HEIM, OSC HAS DECIDED TO IMPLEMENT THE REMOVAL COST MANAGEMENT SYSTEM COMPUTER PROGRAM BEGINNING THURS SEPT 3, 87. APPROXIMATELY 2 DAYS WILL BE REQUIRED TO INPUT ALL BACKLOGGED INFORMATION.
- C. ERCS CONSTRUCTED FACILITIES FOR USE IN THE DECON AREA.

To: ERD/OERR (EPAS511)
To: T. MASSEY (EPA9374)
From: T. MASSEY (EPA9374) Delivered: Fri 4-Sep-87 10:56 EDT Sys 163
Subject: BELFIELD AVE SITE POLREP 16
Mail Id: IPM-163-870904-098541094

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA.
CERCLA/SARA REMOVAL ACTION
POLREP 16

ATTN: TIM FIELDS, TOM MASSEY, AND STEVE JARVELA

I. SITUATION (1700HRS, 3 SEPTEMBER 1987)

- A. PERSONNEL ON SCENE: EPA - 2, TAT - 2, ERCS - 4, PAP - 2,
OSHA - 2, DEMOLITION CONTRACTOR - 3, ERT/TAT - 1.
- B. WEATHER: SUNNY, TEMP. HIGH 70'S, WINDS VARIABLE.
- C. OSHA REPS ONSITE TO MONITOR SITE ACTIVITIES DURING
DEMOLITION OF COLLAPSED ROOF.
- D. ELECTRICITY TURNED ON IN COMMAND POST THIS DATE.
- E. ESTIMATED COSTS TO DATE: CEILING:
- | | | |
|--------|---------|--------|
| EPA - | \$ 1.5K | \$ 30K |
| ERCS - | 35.4K | 60K |
| TAT - | 10.5K | 250K |
| HQ - | 7.1K | 126K |
| ----- | | |
| TOTALS | \$54.5K | 466K |
- F. ERT/TAT MIKE CATALANO ON SITE THIS DATE TO TRAIN EPA FAS
HENRY AND TATM'S ON NEW REMOVAL COST MANAGEMENT SYSTEM.
- G. A DAMAGED WALL APPROX. THREE FEET HIGH COLLAPSED SOMETIME
BETWEEN 1700 HOURS 09-02-87 AND 0800 HOURS 09-03-87.

II. ACTIONS TAKEN (2 SEPTEMBER THRU 3 SEPTEMBER, 1987)

- A. ERCS SECURE ADDITIONAL EMERGENCY EXIT AS WELL AS SECURE A
LADDER FROM 2ND FLOOR TO GROUND AS ADDITIONAL EMERGENCY
EXIT 9/2/87 AS PER OSC.
- B. WATER VALVE INSTALLEED BY PLUMBER 9/2/87 TO PROVIDE WATER
FOR EMERGENCY SHOWERS AND DECONTAMINATION OF PERSONNEL.
- C. JOHN HADALSKI, CITY MGT., CONTACTED 9/2/87 TO ASSIST OSC
WITH ESTABLISHING ELECTRICITY IN COMMAND POST AS PECO
ESTIMATED THAT IT WOULD BE AT LEAST THREE MORE DAYS BEFORE
SERVICE COULD BE CONNECTED.

- D. ERCS CHANGE RESPONSE MANAGERS 9/2/87. NEW RM BRIEFED ON ALL SITE ACTIVITIES.
- E. ERCS RESPONSE MANAGER AND DEMOLITION SUBCONTRACTOR (CLEVELAND WRECKING) HELD MEETING ON SITE 9/2/87 TO ESTABLISH WORK PLAN AND COORDINATE SEQUENCE OF EVENTS FOR 9/3/87.
- F. ERCS SUBCONTRACTOR BEGINS TO REMOVE COLLAPSED ROOF FROM ABOVE DRUMS THIS DATE. SHEET METAL REMOVED TO VENTILATE AREA. WINDOW PANES BETWEEN COLLAPSED ROOF AREA AND WAREHOUSE CUT OUT THIS DATE.
- G. TAT PROVIDED PHOTO DOCUMENTATION AND CONTINUOUS AIR MONITORING DURING ALL SITE ACTIVITIES.

III. FUTURE PLANS

- A. ERCS TO UPDATE PROPOSED WORK PLAN RELATIVE TO ROOF DEMOLITION OPERATIONS AS REQUESTED BY OSC.
- B. ERCS TO FINALIZE INVENTORY OF MATERIALS.
- C. ERCS SUBCONTRACTOR TO CONTINUE DEMOLITION OF COLLAPSED ROOF AREA.
- D. FAS, TAT, AND ERCS TO UPDATE REMOVAL COST MANAGEMENT SYSTEM.
- E. DUAL TO TRANSPORT ALL ALL BAGGED ASBESTOS OFF SITE 09-04-87.

GARRETT H. ARAI, OSC
JOAN HENRY, FAS
U.S.EPA, REGION III
PHILADELPHIA, PA.

To: ERD/DERA (EPA5511)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Wed 2-Sep-87 14:31 EDT Sys 163
Subject: polrep 18 belfield ave. site
Mail Id: 1PM-163-b70909-130680465

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA.
CERCLA/BARA REMOVAL ACTION
POLREP 17

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1700HRS, 4 SEPTEMBER 1987)

A. PERSONNEL ON SCENE: EPA - 3, TAT - 2, ERCS - 3, PRP - 1,
DEMOLITION CONTRACTOR - 4, .

B. WEATHER: SUNNY, TEMP. HIGH 70'S, WINDS VARIABLE.

C. ESTIMATED COSTS TO DATE:	CEILING:
EPA - \$ 1.5K	\$ 30K
ERCS - 35.4K	60K
TAT - 10.5K	250K
HQ - 7.1K	125K

TOTALS \$54.5K	466K

D. COST REMOVAL SYSTEM IMPLEMENTED ON COMPUTER.

E. PRP VERNON ON SCENE THIS DATE.

II. ACTIONS TAKEN

A. REMOVAL ACTIVITIES OF ROOF CONTINUE.

B. RAM READINGS INDICATE VERY LOW LEVELS OF DUSTS WITHIN THE BUILDING DURING REMOVAL ACTIVITIES.

G. TAT PROVIDED PHOTO DOCUMENTATION AND CONTINUOUS AIR MONITORING DURING ALL SITE ACTIVITIES.

H. OSC ARAI CONTACTED ATSDR REGARDING VERBAL ANALYTICAL RESULTS RECEIVED ON DUST SAMPLES. PRELIMINARY INDICATIONS ARE THAT DUST CONTAINS ASBESTOS, AND HEAVY METALS TO INCLUDE NICKLE, LEAD, MERCURY, AND TRACE LEVELS OF ARSENIC, CHROMIUM, AND OTHERS. ATSDR AGREED WITH OSC THAT ALL PERSONNEL IN THE BLDG WILL WEAR HEAVY DUTY DUST MASKS APPROVED FOR ASBESTOS AND LEAD.

I. DUAL TRANSPORTED ALL BAGGED ASBESTOS OFF SITE THIS DATE.

100167

- J. A SMALL FIRE ERUPTED IN AN ELECTRICAL CONDUIT DURING CUTTING OPS. FIRE WAS EXTINGUISHED WHEN CONDUIT WAS CUT ON EITHER SIDE AND DROPPED TO THE FLOOR.

III. FUTURE PLANS

- A. ERCS TO UPDATE PROPOSED WORK PLAN RELATIVE TO ROOF DEMOLITION OPERATIONS AS REQUESTED BY OSC.
- B. ERCS TO FINALIZE INVENTORY OF MATERIALS.
- C. ERCS SUBCONTRACTOR TO CONTINUE DEMOLITION OF COLLAPSED ROOF AREA.
- D. FAS, TAT, AND ERCS TO UPDATE REMOVAL COST MANAGEMENT SYSTEM.
- E. TAT TO PREPARE PACKAGE FOR ATSDR RELATIVE TO CONTAMINATED DUSTS ON SITE.
- F. OSC DIRECTED ERCS TO HOSE DOWN DECON AREA AND REMOVE GROSS DUST NEAR THE LOADING DOCK . OSC HAS ALSO DIRECTED ERCS TO PREPARE FOR CONTAMINATED DUST REMOVAL IN THE WOOD WORKING ROOM OF FACILITY.

GARRETT H. ARAI, OSC
JOAN HENRY, FAS
U.S.EPA, REGION III
PHILADELPHIA, PA.

100168

To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Wed 9-Sep-87 16:08 EDT Sys 163
Subject: polrep 18 belfield ave site
Mail Id: IPM-163-870909-145210796

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA.
CERCLA/SARA REMOVAL ACTION
POLREP 18

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1530 HRS, 8 SEPTEMBER 1987)

- A. PERSONNEL ON SCENE: EPA - 2, TAT - 6, ERCS - 5.
- B. WEATHER: LIGHT TO MODERATE RAIN; TEMPS IN THE MID 70'S.
- C. ESTIMATED COSTS AS OF 9/7/87:
- | AGENCY | CURRENT | CEILING |
|--------|---------|---------|
| EPA - | \$ 2.5K | \$ 30K |
| ERCS - | 39.5K | 60K |
| TAT - | 11.6K | 250K |
| HQ - | 8.1K | 126K |
| ----- | | |
| TOTALS | \$61.7K | 466K |
- D. JOAN HENRY, FAS ON SCENE TO UPDATE RCMS WITH ERT, TAT AND ERCS PCT.
- E. BURNS SECURITY REPORTED THAT INTRUDERS GAINED ENTRY INTO BUILDING AND WERE CAUGHT CARRYING 2 CASES OF GLUE PRODUCTS OFF SITE. GUARDS REPORTED THAT INTRUDERS DROPPED THE GLUE AND RAN. INTRUDERS WERE NOT APPREHENDED.
- F. PROBLEMS ENCOUNTERED WITH THE NEW RCMS VERSION III IMPLEMENTATION. ERCS MANAGER, PROJ. COST ACCT. (DUN HEIN) AIDING IN RESOLVING COMPLICATIONS.

II. ACTIONS TAKEN

- A. ROOF DEMOLITION OPS CONTINUED THIS DATE; ESTIMATED DATE OF COMPLETION TO ACCESS DRUMS ON OR ABOUT SEPT. 16, 1987.
- B. EPA, TAT AND ERCS HAVE RCMS ON LINE AND HAVE SET UP AN INTERNAL WITH FINDLAY, OH FOR OHM REQUIREMENTS. UPDATING OF SYSTEM CONTINUES.
- C. OSC DIRECTED ERCS TO AMMEND WORK PLAN SO THAT TASKS AND TIMES OF COMPLETION ARE MORE ACCURATELY REFLECTED SINCE CHANGES HAVE BEEN IMPLEMENTED (CHANGE OF DEMO CONTRACTOR FROM HAWTHORNE TO CLEVELAND WRECKING).
- D. OSC DIRECTED ERCS TO SECURE A STORAGE TRAILER FOR EQUIPMENT STORAGE.

100169

III. FUTURE PLANS

- A. CONTINUE ROOF DEMOLITION OPS IN ORDER TO SAFELY ACCESS DRUMS.
- B. ERCS TO SUBMIT AMENDED WORK PLAN TO OSC.
- C. ERCS TO USE HIGH EFFICIENCY VACUUM TO REMOVE GROSS DUST IN WOOD WORKING ROOM.
- D. ANALYSIS OF CONTAMINATED DUST SAMPLE TO BE SENT TO ATSDR.

GARRETT H. ARAI, OSC
JOAN HENRY, FAS
U.S.EPA, REGION III
PHILADELPHIA, PA.

To: ERD/DEHR (EPAS511)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Thu 10-Sep-87 8:52 EDT Sys 163
Subject: POLREP 19 BELFIELD AVE. SITE
Mail Id: IPM-163-870910-079860127

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA.
CERCLA/SARA REMOVAL ACTION
POLREP 19

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1630 HRS, 9 SEPTEMBER 1987)

A. PERSONNEL ON SCENE: EPA - 3, TAT - 3, ERCS - 5,
ERCS SUBS - 5.

B. WEATHER: PARTLY CLOUDY, TEMPS IN THE MID 80'S.

C. ESTIMATED COSTS AS OF 9/8/87:

AGENCY	CURRENT	CEILING
EPA -	\$ 2.3K	\$ 30K
ERCS -	44.2K	250K
TAT -	12.7K	60K
HQ -	9.0K	126K

TOTALS	\$68.2K	466K

D. FAS'S JOAN HENRY AND MARK OSTRANDER ON SCENE TO UPDATE
RCMS. PROBLEMS WITH THE COST TRACKING SYSTEM ARE
CURRENTLY BEING WORKED OUT. INPUTTING OF PREVIOUS DAILIES
ACCUMULATED TO DATE HAS TAKEN A CONSIDERABLE AMOUNT OF
TIME.

E. COMPLETION DATE OF PROJECT ON THE DELIVERY ORDER WAS CHANGED
FROM 8/20/88 TO 2/20/89.

II. ACTIONS TAKEN

- A. ERCS REPAIR COMMAND POST STAIRS AS TOP STEP POSED A
TRIPPING HAZARD.
- B. ROOF DEMOLITION OPS CONTINUE THIS DATE WITHOUT INCIDENT.
ERCS SUBCONTRACTOR CONTINUES WORKING 8 HOUR SHIFTS.
- C. TAT CONTINUES CONTRACTOR MONITORING, PHOTO DOCUMENTATION
AND UPDATING OF SITE SAFETY PLAN.
- D. TAT PREPARING PACKAGE FOR ATSDR RELATIVE TO ANALYTICAL
RESULTS ON DUST SAMPLES COLLECTED 8/31/87.

- E. OSC SPOKE WITH ERNEST WILLIS, DQC, OSHA AT 0900 HRS. THIS DATE REGARDING ROOF DEMOLITION OPERATIONS. OSHA INDICATED HE WOULD LIKE TO MEET WITH FOREMAN OF THE CLEVELAND WRECKING CREW ON 9/10/87.
- F. ERCS SET UP HEPA VACUUM INSIDE WORK ZONE TO KEEP DUST AND PARTICULATE MATTER DOWN. ALL DUST ELIMINATED FROM DECON ON THIS DATE.
- G. SEVERAL CASES OF GLUE AND CERAMIC PIGMENTS HAVE BEEN NOTICED STREWN THROUGHOUT THE BUILDING FLOOR.
- H. OSC AND RESPONSE MANAGER EXTRACTED CHILDREN FROM WITHIN THE BUILDING AND WARNED THEM OF HAZARDS EXISTING ON THE PROPERTY. SECURITY SERVICE (BURNS) WAS AGAIN WARNED THAT PEOPLE WERE STILL ENTERING THE SITE.
- I. OSC CONTACTS CRES (STEUTEVILLE) WITH SITE UPDATE AND INTENT TO GIVE NOTICE TO PRP VERNON REGARDING ALL OTHER MATERIALS WITHIN THE DAMAGED BUILDING.

III. FUTURE PLANS

- A. COMPUTER COST TRACKING SYSTEM TO BE CAUGHT UP BY 9/10/87.
- B. DECONTAMINATED SCRAP METAL FROM THE BUILDING TO BE HAULED OFF SITE. WATER FROM DECON TO BE CONTAINED IN DRUMS AND PROPERLY DISPOSED OF LATER.
- C. OSC TO CONTACT PRP VERNON REGARDING OTHER MATERIALS STILL EXISTING ON PROPERTY, i.e. TANKS, VITAMIN SUPPLEMENTS, GLUE, MISC. DRUMS OF DYES AND PIGMENTS.

GARRETT H. ARAI, OSC
JOAN HENRY, FAS
U.S. EPA, REGION III
PHILADELPHIA, PA.

To: ERD/OERR (EPASS11)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Fri 11-Sep-87 14:46 EDT Sys 183
Subject: BELFIELD AVE POLREP #20
Mail Id: IPM-163-870911-132920846

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA.
CERCLA/SARA REMOVAL ACTION
POLREP 20

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1630 HRS, 10 SEPTEMBER 1987)

A. PERSONNEL ON SCENE: EPA - 2. TAT - 3. ERCS - 3.
ERCS SUBS - 6.

B. WEATHER: SUNNY, TEMPS IN THE 80'S.

C. ESTIMATED COSTS AS OF 9/9/87:

AGENCY	CURRENT	CEILING
EPA -	\$ 2.9K	\$ 30K
ERCS -	47.1K	250K
TAT -	15.2K	60K
HQ -	9.0K	126K

TOTALS	\$68.8K	466K

D. OSHA ON SCENE THIS AM TO OFFICIALLY CITE CLEVELAND
WRECKING FOR A MINOR SAFETY VIOLATION.

E. HARD COPY OF RESULTS RECEIVED FROM LAB FOR DUST SAMPLES
COLLECTED IN WORK AREA. RESULTS CONFIRM VERBAL
NOTIFICATION OF CONCENTRATIONS OF LEAD, ARSENIC,
ANTIMONY, SELENIUM, CADMIUM, URANIUM, TITANIUM AND ZINC
FOUND IN THE DUST.

II. ACTIONS TAKEN

- A. DECON AREA MODIFIED/RESITUATED IN ORDER FOR HEAVY EQUIPMENT
TO ENTER AND LEAVE EXCLUSION ZONE WITHOUT SPREADING
CONTAMINATION.
- B. CLEVELAND WRECKING MOVED IN DUMP TRAILER TO REMOVE SCRAP
METAL.
- C. TAT SAMPLED BED OF DUMP TRAILER DUE TO PRESENCE OF LARGE
QUANTITIES OF DIRT AND DEBRIS.
- D. OSC DIRECTED ERCS TO DECON ROOF SCRAP PRIOR TO TRANSPORT
OFF SITE FOR SALVAGE BY WRECKING CREW.

- E. OSC NOTIFIED SEPTA REP. RON PATTON, PRP VERNON'S SON JOHN VERNON, CITY OF PHILADELPHIA BUILDING INSPECTORS OFFICE, AND CYNTHIA NADALSKI, US EPA LEGAL REGARDING THE STRUCTURAL INTEGRITY OF THE SOUTH WALL OF BLDG. ON SITE. ERCS STRUCTURAL ENGINEER FEELS THAT SEPTA PASSENGER PLATFORM MAY HAVE BEEN SUPPORTED BY THE WALL AND THAT IN TIME IT PRESENT A HAZARD BECAUSE IT WILL NO LONGER BE SUPPORTED BY THE WALL.

III. FUTURE PLANS

- A. COMPUTER COST TRACKING SYSTEM TO BE CAUGHT UP BY 9/10/87.
- B. DECONTAMINATED SCRAP METAL FROM THE BUILDING TO BE HAULED OFF SITE. WATER FROM DECON TO BE CONTAINED IN DRUMS AND PROPERLY DISPOSED OF LATER.
- C. OSC TO CONTACT PRP VERNON REGARDING OTHER MATERIALS STILL EXISTING ON PROPERTY. I.E. TANKS. VITAMIN SUPPLIMENTS, GLUE, MISC. DRUMS OF DYES AND PIGMENTS.
- D. ERCS TO ARRANGE FOR ANALYSIS OF SAMPLE COLLECTED 09-10-87 FROM BED OF DUMP TRAILER. SAMPLE TO BE ANALYZED FOR HEAVY METALS.
- E. TAT TO COMPLETE PACKAGE FOR ATSDR (ANALYTICAL FROM DUST SAMPLES). PACKAGE TO BE SUBMITTED 09-14-87.

GARRETT H. ARAI. OSC
JOAN HENRY, FAS
U.S.EPA. REGION III
PHILADELPHIA, PA.

To: ERD/OERR (EPA5511)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Fri 11-Sep-87 15:52 EDT Sys 163
Subject: BELFIELD AVE POLREP #21
Mail Id: IPM-163-870911-142940351

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA.
CERCLA/SARA REMOVAL ACTION
POLREP #21

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1630 HRS, 11 SEPTEMBER, 1987)

- A. PERSONNEL ON SCENE: EPA - 2, TAT - 2, ERCS - 3,
ERCS SUBS - 6.
- B. WEATHER: SUNNY, TEMPS IN THE 80'S.
- C. ESTIMATED COSTS AS OF 09/10/87:

AGENCY	CURRENT	CEILING
EPA	\$ 3.1K	\$ 30K
ERCS	50.1K	250K
TAT	16.2K	60K
HQ	10.3K	126K

TOTALS	\$79.7K	466K

- D. RCMS IS NOT CURRENT THIS DATE AS WAS PREVIOUSLY SCHEDULED.
- E. WORK TO CEASE COB 09-11-87 FOR WEEKEND AND START UP 0700 HOURS MONDAY 14 SEPTEMBER, 1987.

II. ACTIONS TAKEN

- A. CLEVELAND WRECKING HAS EXPRESSED CONCERN TO EPA AND OHM PERSONNEL REGARDING PRP VERNON AND HIS SON REFUSING TO COMPLY WITH SITE SAFETY PROTOCOL.
- B. ERCS MOVED IN STORAGE TRAILER FOR EQUIPMENT 0900 HOURS THIS DATE.
- C. A SMALL FIRE WAS STARTED DURING CUTTING OPERATIONS AT 0820 HOURS IN A DRUM LABELED "ALCAN POWERED ALUMINUM". FIRE WAS EXTINGUISHED WITHIN APPROX. 2-3 MINUTES WITH DRY CHEMICAL EXTINGUISHERS. DRUM WAS SECURED AND NO OTHER INCIDENTS WERE NOTED DURING CUTTING OPERATIONS THIS DATE.
- D. ERCS DECONNED SCRAP METAL AND BEGAN LOADING FOR TRANSPORT OFF SITE.

- E. SEPTA REPRESENTATIVE MATT TRZEPACZ CONTACTED OSC ARAI BY TELEPHONE AT 0900 HOURS THIS DATE. TRZEPACZ STATED TO OSC THAT HE WOULD SEND OUT A REPRESENTATIVE TO ASSESS THE SITUATION 09-11-87 OR 09-12-87.
- F. ERCS CONTINUES TO MOVE DRUMS AS REQUIRED FOR WRECKING CREW TO CONTINUE ROOF DEMO OPS. DRUMS ARE BEING RELOCATED TO AN AREA ISOLATED FROM WRECKING CREW'S WORK AREA.
- G. PROBLEMS WITH RCMS PROGRAM AND PRINTER MALFUNCTION OF PRINTER HAVE MADE IT IMPOSSIBLE TO BRING RCMS UP TO DATE AS PREVIOUSLY SCHEDULED.
- H. OSC AUTHORIZED RENTAL OF A LASER PRINTER TO REPLACE THE ONE BEING RETURNED TO EPA OFFICE FOR REPAIRS.
- J. ROOF AND BEAMS ARE DOWN; DEBRIS FROM ROOF COLLAPSE STILL PREVENTING ACCESS TO DRUMS AND WILL HAVE TO BE EXTRACTED.
- K. ERCS COVERED EXPOSED MATERIALS WITH VISQUEEN IN CASE OF RAIN THIS WEEKEND.

III. FUTURE PLANS

- A. COMPUTER COST TRACKING SYSTEM TO BE CAUGHT UP AT THE EARLIEST POSSIBLE DATE.
- B. DECONTAMINATED SCRAP METAL FROM THE BUILDING TO BE TRANSPORTED OFF SITE. WATER FROM DECON TO BE CONTAINED FOR EVENTUAL TRANSPORT OFF SITE.
- C. OSC TO CONTACT PRP VERNON REGARDING OTHER MATERIALS STILL EXISTING ON PROPERTY, I.E. TANKS, VITAMIN SUPPLEMENTS, GLUE, MISC. DRUMS OF DYES AND PIGMENTS.
- D. OSC TO INQUIRE ABOUT DEBRIS IN DUMP TRAILER. IF OSC DEEMS IT NECESSARY ERCS WILL ARRANGE FOR ANALYSIS OF SAMPLE WHICH WAS COLLECTED 09-10-87.
- E. YAT TO COMPLETE PACKAGE FOR ATSDR (ANALYTICAL FROM DUST SAMPLES). PACKAGE TO BE SUBMITTED 09-14-87.
- F. PRP VERNON TO PROVIDE EPA WITH WRITTEN CONFIRMATION OF PRIOR DISCUSSIONS WITH OSC ARAI WHEREIN VERNON STATED THAT HE WAS NOT ABLE, NOR INTERESTED IN REMOVING SCRAP METAL FROM ROOF AND SALVAGING SAME. HE REQUESTED OSC HANDLE.
- G. ERCS TO MOVE IN ADDITIONAL PERSONAL WEEK OF 09-14-87 (AS APPROVED BY OSC) IN ORDER TO INITIATE DRUM STAGING AND FINAL INVENTORY OPERATIONS.
- H. WRECKING CREW ANTICIPATED TO COMPLETE ROOF DEMO OPERATIONS WEEK OF 09-14-87. GROSS DEBRIS FROM COLLAPSE STILL HAS TO BE EXTRACTED IN ORDER TO SAFELY ACCESS DRUMS.

100176

GARRETT H. ARAI, OSC
U.S. EPA, REGION III
PHILADELPHIA, PA.

To: ERD/GERR (EPASS11)
To: T. MASSEY (EPA9374)
From: T. MASSEY (EPA9374) Delivered: Tue 15-Sep-87 18:34 EDT Sys
Subject: belfield ave polrep #22
Mail Id: IPM-162-870915-167200346

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA.
CERCLA/SARA REMOVAL ACTION
POLREP #22

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1630 HRS, 14 SEPTEMBER, 1987)

A. PERSONNEL ON SCENE: EPA - 2, TAT - 3, ERCS - 6,
ERCS SUBS - 5.

B. WEATHER: SUNNY. TEMPS IN THE 80'S.

C. ESTIMATED COSTS AS OF 09/11/87:

AGENCY	CURRENT	CEILING
EPA	\$ 3.1K	\$ 30K
ERCS	52.1K	250K
TAT	16.3K	60K
HQ	10.7K	126K

TOTALS	\$82.2K	466K

D. RCMS IS STILL NOT CURRENT THIS DATE DUE TO PROGRAM DIFFICULTIES.

II. ACTIONS TAKEN

A. ERCS MOVED IN 2 RT'S AND A CHEMIST FOR DRUM INVENTORY, DRUM STAGING, AND DRUM SAMPLING OPERATIONS.

B. OSC DIRECTED ERCS TO CONTAIN ALL DECON WATERS GENERATED ON SITE.

C. ERCS CONTINUED TO DECON SCRAP METAL IN PREPARATION FOR OFF SITE TRANSPORT.

D. TWO LOADS OF SCRAP FROM ROOF LOADED AND TRANSPORTED OFF SITE THIS DATE.

E. OSC DIRECTED ERCS 1 AMPLE BLOCKS TO DETERMINE IF THEY ARE OF A HAZARDOUS OR NON HAZARDOUS NATURE.

F. ERCS CONTINUES TO MOVE DRUMS AS REQUIRED FOR WRECKING CREW TO CONTINUE ROOF DEMO OPS. DRUMS ARE BEING RELOCATED TO AN AREA ISOLATED FROM WRECKING CREW'S WORK AREA.

- G. TAT UPDATED AND AMENDED SITE SAFETY PLAN, AIR MONITORING PLAN AS DIRECTED BY THE OSC. TAT CONTINUES TO PERFORM PHOTO DOCUMENTATION, CONTRACTOR MONITORING, AND PROJECT COST MONITORING.
 - H. TAT CONTINUES TO PERFORM CONTINUOUS AIR MONITORING AND SURVEY OF AIR QUALITY NEAR DRUMS/CONTAINERS WITH AN HNU PHOTO IONIZATION DETECTOR AND EXPLOSIMETER.
 - I. OSC CONTACTED PRP VERNON REGARDING MATERIALS LEFT IN THE BUILDING. VERNON STATED TO OSC THAT HE WOULD CONTACT FORMER TENNANTS TO REMOVE BLUE PRODUCTS AND VITAMIN SUPPLEMENTS FROM THE PRESENCE. VERNON INFORMED OSC THAT HE SOLD CLAY AND CLAY PIGMENTS TO A LOCAL SCHOOL. HE ALSO STATED THAT HE INTENDED TO BULK AND ANALYZE THE REMAINDER OF MATERIALS ON THE ROOF, IN THE BASEMENT, AND THE "VISUAL PACKAGING" PORTION OF THE FACILITY. THESE MATERIALS ARE TO BE TRANSPORTED AND DISPOSED OF BY VERNON IN AN ENVIRONMENTALLY SAFE MANNER. VERNON ALSO AGREED TO SELL EMPTY 55 GALLON DRUMS TO ERCS TO CONTAIN WATER UNTIL THEY COULD MAKE ARRANGEMENTS FOR CONTAINMENT.
 - J. OSC CONTACTED ED PARKER, METHODS RESEARCH, REGARDING THE BLUE PRODUCTS WHICH ARE STILL ON SITE. PARKER STATED TO OSC THAT HE INTENDED TO HAVE DANLADI CONSTRUCTION ON SITE TO REMOVE THE PRODUCTS FROM THE PREMISES SOME TIME THIS WEEK.
 - K. OSC CONTACTED HERB FLETCHER OF DANLADI CONSTRUCTION CO. FLETCHER WAS A PREVIOUS OWNER OF NATURE'S SECRETS WHICH IS NO LONGER OPERATES. FLETCHER HAS AGREED TO DISPOSE OF THE VITAMIN SUPPLEMENT MATERIALS.
- III. FUTURE PLANS
- A. COMPUTER COST TRACKING SYSTEM TO BE CAUGHT UP AT THE EARLIEST POSSIBLE DATE.
 - B. DECONTAMINATED SCRAP METAL FROM THE BUILDING TO BE TRANSPORTED OFF SITE. WATER FROM DECON TO BE CONTAINED FOR EVENTUAL TRANSPORT OFF SITE.
 - D. ERCS TO SAMPLE BLOCKS FROM WALL AND ARRANGE FOR ANALYSIS REQUIRED TO OBTAIN APPROVAL FOR DISPOSAL AT A SANITARY LANDFILL.
 - E. ERCS TO BEGIN STAGING AND INVENTORY OF DRUMS AS DRUMS BECOME ACCESSIBLE UNDER ROOF DEBRIS.
 - F. ERCS TO MOVE IN 5K GALLON POOL TO CONTAIN DECON WATER.
 - G. OSC TO COORDINATE VITAMIN AND BLUE REMOVAL AS SOON AS ROOF OPS ARE COMPLETED.

GARRETT H. ARAI, OSC
U.S. EPA, REGION III
PHILADELPHIA, PA

To: ERD/DERA (EPA5511)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Wed 16-Sep-87 17:35 EDT Sys 163
Subject: BELFIELD AVE SITE
Mail Id: IPM-163-870916-138270886

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA.
CERCLA/SARA REMOVAL ACTION
POLREP #23

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (2030 HRS, 15 SEPTEMBER, 1987)

- A. PERSONNEL ON SCENE: EPA - 2, TAT - 4, ERCS - 6.
ERCS SUBS - 4.
- B. WEATHER: SUNNY. TEMPS IN THE 80'S.
- C. ESTIMATED COSTS AS OF 09/14/87:

AGENCY	CURRENT	CEILING
EPA	\$ 3.5K	\$ 30K
ERCS	58.8K	250K
TAT	17.0K	60K
HQ	11.9K	126K

TOTALS	\$91.2K	466K

- D. RCMS IS STILL NOT CURRENT THIS DATE DUE TO PROGRAM DIFFICULTIES.

II. ACTIONS TAKEN

- A. OSC DISCUSSED PERSONNEL PROTECTION REQUIREMENTS FOR SITE ENTRY; PRP INFORMED THAT ALL PERSONNEL MUST WEAR THE APPROPRIATE SAFETY ATTIRE PRIOR TO ENTRY. PRP VERNON AGREED TO COMPLY WITH SITE SAFETY PLAN.
- B. ERCS SET UP 5,000 GALLON POOL TO CONTAIN DECON WATER ON SITE.
- C. ERCS CONTINUED TO DECON SCRAP METAL IN PREPARATION FOR OFF SITE TRANSPORT.
- D. ONE LOAD OF SCRAP FROM ROOF LOADED AND TRANSPORTED OFF SITE THIS DATE.

- E. ERCS UNCOVERED A FIBER DRUM (APPROX. 35 GAL.) LABELED ZINC DUST. DRUM APPEARED TO BE WET AND IT IS SUSPECTED THAT PRODUCT HAS BEEN EXPOSED TO MOISTURE. DRUM WAS OVERPACKED IN A 17H DRUM AND WILL BE VENTED THIS EVENING. PRODUCT WILL BE COOLED WITH DRY ICE AND VENTED FOR 2 TO 3 DAYS PRIOR TO MOVING DRUM. OSC NOTIFIED PFD OF PRESENCE OF MATERIAL ON SITE. OSC IS CONCERNED THAT HYDROGEN GAS IS BEING GENERATED BY AN EXOTHERMIC REACTION DUE TO MOISTURE IN THE DRUM. IF THIS IS IN FACT OCCURRING, THERE COULD BE A RISK OF SPONTANEOUS IGNITION OF THE PRODUCT WITHIN THE DRUM.
- F. ERCS CONTINUES TO MOVE DRUMS AS REQUIRED FOR WRECKING CREW TO CONTINUE ROOF DEMO OPS. DRUMS ARE BEING RELOCATED TO AN AREA ISOLATED FROM WRECKING CREW'S WORK AREA.
- G. TAT SUBMITTED ANALYTICAL PACKAGE FOR ATSDR REGARDING ASBESTOS AND HEAVY METAL CONTAMINATED DUSTS.
- H. TAT CONTINUES TO PERFORM CONTINUOUS AIR MONITORING AND SURVEY OF AIR QUALITY NEAR DRUMS/CONTAINERS WITH AN HHU PHOTO IONIZATION DETECTOR AND EXPLOSIMETER.
- I. OSC CONFIRMED HIS TELEPHONE CONVERSATION WITH ED PARKER, METHODS RESEARCH, VIA WRITTEN NOTICE REGARDING THE GLUE PRODUCTS WHICH ARE STILL ON SITE.
- J. OSC ALSO SENT A NOTICE TO HERB FLETCHER OF DANLADI CONSTRUCTION CO. CONFIRMING TELEPHONE CONVERSATION OF 09-15-87.
- K. PROBLEMS WERE ENCOUNTERED WITH WET BAGS OF SAND AND WALLOSTONITE FELL OFF PALLETS WHILE ERCS WAS TRYING TO EXTRACT THEM FROM ROOF DEBRIS. APPROXIMATELY TEN BAGS OF THESE MATERIALS BROKE OPEN AND SPILLED ON FLOOR OF FACILITY. MATERIAL IS PRESUMED TO BE CONTAMINATED BY DUST AND RUN OFF WATER ON THE FLOOR.
- L. SEPTA REPRESENTATIVES LAGUARDIA AND MCMENAMER WERE ON SCENE THIS DATE TO INSPECT STRUCTURAL INTEGRITY OF FREE STANDING WALL ADJACENT TO THE SEPTA TRACKS AND PASSENGER PLATFORM. OSC AND SEPTA REPS. ARE CONCERNED THAT THE WALL MAY COLLAPSE DUE TO VIBRATIONS FROM THE TRAINS PASSING. SEPTA INTENDS TO CONTACT PRP VERNON REGARDING THE SITUATION.

III. FUTURE PLANS

- A. COMPUTER COST TRACKING SYSTEM TO BE CAUGHT UP AT THE EARLIEST POSSIBLE DATE.

- B. DECONTAMINATED SCRAP METAL FROM THE BUILDING TO BE TRANSPORTED OFF SITE. WATER FROM DECON TO BE CONTAINED FOR EVENTUAL TRANSPORT OFF SITE.
- D. ERCS TO SAMPLE BLOCKS FROM WALL AND ARRANGE FOR ANALYSIS REQUIRED TO OBTAIN APPROVAL FOR DISPOSAL AT A SANITARY LANDFILL.
- E. ERCS TO BEGIN STAGING AND INVENTORY OF DRUMS AS DRUMS BECOME ACCESSIBLE UNDER ROOF DEBRIS.
- F. ERCS TO CONTACT HQ TO IRON OUT DIFFICULTIES WITH RCMS AS DIRECTED BY OSC.

GARRETT H. HRAI, OSC
U.S.EPA, REGION III
PHILADELPHIA, PA.

To: ERD/GERR (EPASS11)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Thu 17-Sep-87 18:54 EDT Sys 163
Subject: BELFIELD AVENUE SITE
Mail Id: IPM-163-870917-170100265

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA.
CERCLA/SARA REMOVAL ACTION
RQLREP #24

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (2030 HRS, 16 SEPTEMBER, 1987)

- A. PERSONNEL ON SCENE: EPA - 1, TAT - 3, ERCS - 6,
ERCS SUBS - 4.
- B. WEATHER: PARTLY CLOUDY, TEMPS IN THE 80'S.
- C. ESTIMATED COSTS AS OF 09/15/87:

AGENCY	CURRENT	CEILING
EPA	\$ 3.7K	\$ 30K
ERCS	62.4K	250K
TAT	18.5K	60K
HQ	12.7K	126K

TOTALS	\$97.3K	466K

- D. RCMS IS STILL NOT CURRENT THIS DATE DUE TO PROGRAM DIFFICULTIES.

II. ACTIONS TAKEN

- A. TAT PERFORMED VENDOR SEARCH FOR MANUFACTURERS AND/OR DISTRIBUTERS OF POWDERED ZINC PRODUCTS TO DETERMINE IF PRODUCT IS REUSABLE, IF VENDORS WOULD BE INTERESTED IN USING IT, AND IN WHAT STATE THE PRODUCT WOULD HAVE TO BE IN TO BE TRANSPORTED AND REUSED, AS WELL AS THE IMPLICATIONS IF THE CONTENTS OF THE DRUM WERE IN FACT WET. OSC WAS BRIEFED BY TAT ON INFORMATION SOLICITED. THE GENERAL CONSENSUS WAS THAT THE ZINC WOULD HAVE TO BE STABILIZED PRIOR TO TRANSPORTING FOR REUSE. TAT RECOMMENDED TO OSC THAT WATER SHOULD BE UTILIZED TO REDUCE THE MATERIAL TO A STABLE PRODUCT. INFORMATION OBTAINED FROM MANUFACTURERS OF ZINC DUSTS AND POWDERS SUPPORTED THIS RECOMMENDATION AND INDICATED IT WAS A VIABLE PROCEDURE FOR THE QUANTITY OF ZINC POWDER CONTAINED IN THE DRUM.

- B. STABILIZATION AND TREATMENT/DISPOSAL OPTIONS FOR FIBER DRUM SUSPECTED TO CONTAIN MOIST ZINC DUST WERE DISCUSSED

IN A CONFERENCE CALL INITIATED BY OSC AT 1350 HOURS THIS DATE. THE FOLLOWING PARTIES WERE TIED INTO THE CONFERENCE CALL:

GARRETT ARAI, OSC
BOUG FOX, OSC
KATHLEEN BARRY, TAT
TOM KADY, ERT
JOHN MALCOLL, ERT

FRED HALVERSON, CHM
BILL BUCHANON, CHM
GARY ROSEMAN, CHM
ALBERT SMITH, CHM
SAM INSALACO, CHM

- C. ERT RECOMMENDED THAT MATERIAL BE STAGED IN AN EVEN THIN UNIFORM PATTERN ON CEMENT AND BLANKETED WITH METAL X TO PREVENT A FLAMMABLE MIXTURE (METAL X WOULD EXCLUDE THE OXYGEN REQUIRED TO SUPPORT COMBUSTION).
- D. OSC CONTACTED SPECIAL HAZARDS MANAGEMENT CO. TO INQUIRE ABOUT OPTIONS AVAILABLE TO STABILIZE THE ZINC. THEY RECOMMENDED THAT PRODUCT BE "SLURRIED" WITH WATER AND ALLOWED TO REACT TO A STABLE MATERIAL (ZINC OXIDE).
- E. CHM SUGGESTED THE FOLLOWING OPTIONS:
- 1) DRYING THE MATERIAL IN A MOBIL DRYER UNIT IN PREPARATION FOR OFF SITE TRANSPORT TO EITHER THERMAL KEM OF SOUTH CAROLINA OR OTHER INCINERATION.
 - 2) DRY THE PRODUCT AS OUTLINED ABOVE AND TRANSPORT OFF SITE FOR REUSE.
- F. OSC AGREED TO USE SPECIAL HAZARDS MANAGEMENT CO. PENDING A TEST OF THE PROCEDURE WITH A SAMPLE QUANTITY OF THE ZINC POWDER.
- G. ERCS CONTINUED TO DECON SCRAP METAL IN PREPARATION FOR OFF SITE TRANSPORT.
- H. ONE LOAD OF SCRAP FROM ROOF LOADED AND TRANSPORTED OFF SITE THIS DATE.
- I. ERCS BEGAN A NITROGEN PURGE INSIDE THE OVERPACK (17H) DRUM IN ORDER TO MAINTAIN AN INERT ATMOSPHERE FOR ANY HYDROGEN GAS THAT MIGHT BE RELEASED FROM THE FIBER DRUM OF ZINC POWDER. A VISQUEEN "GLOVE BAG" WAS ERECTED AROUND THE DRUM.
- J. TAT CONTINUES TO PERFORM CONTINUOUS AIR MONITORING AND SURVEY OF AIR QUALITY NEAR DRUMS/CONTAINERS WITH AN HNU PHOTO IONIZATION DETECTOR AND EXPLOSIMETER.

- K. OSC NOTIFIED PHILADELPHIA FIRE OFFICIALS, CITY MANAGING DIRECTORS OFFICE, AND CITY POLICE OF SITE STATUS AND FUTURE PLANS REGARDING TREATMENT/DISPOSAL METHODOLOGY FOR THE ZINC DUST.
- L. CITY MANAGING DIRECTOR'S OFFICE ARRANGED TO USE BOMB SQUAD TRUCK TO TRANSPORT THE MATERIAL IF TAKEN OFF SITE FOR TREATMENT. PRELIMINARY PLANS ARE TO USE THE CITY BOMB SQUAD DETENTION RANGE TO REACT THE MATERIAL.

III. FUTURE PLANS

- A. OSC TO DETERMINE IF RUMS CAN BE BROUGHT BACK ON LINE IN COST EFFECTIVE MANNER.
- B. DECONTAMINATED SCRAP METAL FROM THE BUILDING TO BE TRANSPORTED OFF SITE. WATER FROM LEACH TO BE CONTAINED FOR EVENTUAL TRANSPORT OFF SITE.
- C. ERCS TO SAMPLE ALL DEMOLITION DEBRIS (INCLUDING BLOCK) AND ARRANGE FOR ANALYSIS REQUIRED TO OBTAIN APPROVAL FOR DISPOSAL AT A SANITARY LANDFILL.
- D. CLEVELAND WRECKING TO COMPLETE CUTTING UPS AND REMOVE FROM SITE.
- E. ERCS TO BEGIN STAGING AND INVENTORY OF DRUMS AS DRUMS BECOME ACCESSIBLE UNDER ROOF DEBRIS.
- F. OSC TO FINALIZE ARRANGEMENTS FOR FIELD TEST TO BE PERFORMED BY SPECIAL HAZARDS MANAGEMENT COMPANY.
- G. OSC TO DETERMINE IF REACTION WILL OCCUR ON OR OFF SITE AND INITIATE APPROPRIATE PREPARATIONS FOR THE PROCESS.
- H. OSC TO MAKE PRELIMINARY PLANS FOR PERFORMING THE ACTUAL REACTION OF THE ZINC DUST OFF SITE AT A REMOTE LOCATION.

GARRETT H. ARAI, OSC
U.S.EPA, REGION III
PHILADELPHIA, PA.

To: ERD/OERR (EPA5511)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Thu 17-Sep-87 19:14 EDT Sys 163
Subject: BELFIELD AVE POLREP #25
Mail Id: IPM-163-870917-173140776

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA.
CERCLA/SLRA REMOVAL ACTION
POLREP #25

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1700 HRS, 17 SEPTEMBER, 1987)

- A. PERSONNEL ON SCENE: EPA - 1, TAT - 3, ERCS - 6,
ERCS SUBS - 4.
- B. WEATHER: CLOUDY, INTERMITTENT HEAVY RAINS, TEMPS IN THE
MID 80'S.
- C. ESTIMATED COSTS AS OF 09/16/87:

AGENCY	CURRENT	CEILING
EPA	\$ 3.9K	\$ 20K
ERCS	66.4K	250K
TAT	19.8K	80K
HQ	13.5K	126K

TOTALS	\$103.6K	466K

II. ACTIONS TAKEN

- A. CLEVELAND WRECKING CREW COMPLETED CUTTING AND LOADING
DECONNED SCRAP FROM ROOF AT 1430 HOURS THIS DATE.
TWO TRUCK LOADS OF SCRAP WERE TRANSPORTED OFF SITE THIS
DATE.
- B. CLEVELAND WRECKING DEMOED FROM SITE AT 1500 HOURS THIS
DATE.
- C. OSC, TAT AND ERCS MET WITH SPECIAL HAZARDS MANAGEMENT
COMPANY REPS. AT 1030 HOURS THIS DATE TO DISCUSS FINAL
ARRANGEMENTS FOR TEST "REACTION " OF ZINC DUST.
- D. NITROGEN PURGE ON DRUM CONTAINING FIBER DRUM OF ZINC DUST
WAS INTERRUPTED SOMETIME BETWEEN 1900 HOURS 16 SEPTEMBER
AND 0700 HOURS 17 SEPTEMBER, 1987 AS NITROGEN BOTTLE WAS
FOUND EMPTY DURING MORNING ASSESMENT AND AIR MONITORING
ACTIVITIES.

- E. ROBERT ZANG, PA DER ON SCENE TO DISCUSS SITE STATUS AND FUTURE PLANS. ZANG INFORMED OSC THAT MODULAR 1 PROCEDURE WOULD HAVE TO BE FOLLOWED IF NATURE'S RESEARCH PRODUCTS WERE TO BE DISPOSED OF BY PAP HERB FLETCHER. IF PRODUCTS ARE NOT DISPOSED OF APPROPRIATE DOCUMENTATION OF REUSE OR TEMPORARY STORAGE ARRANGEMENTS MUST BE SUBMITTED. SIMILAR PROCEDURES ARE REQUIRED FOR DISPOSAL/REUSE/STORAGE OF BLUE PRODUCTS BY PAP EDWARDS, METHODS RESEARCH.
- F. OSC CONTACTED BOB CIRULSKIS REGARDING THE PROBLEMS WITH RCMS AND CAME TO A MUTUAL AGREEMENT BASED ON SITE SPECIFIC CIRCUMSTANCES THAT IT WAS NOT FEASIBLE TO BRING RCMS ON LINE AND UP TO CURRENT STATUS FOR THIS SITE. OSC DIRECTED TAT AND ERCS TO PLACE RCMS ON STANDBY FOR THE REMAINDER OF REMOVAL ACTIVITIES.
- G. TAT CONTINUES TO PERFORM CONTINUOUS AIR MONITORING AND SURVEY OF AIR QUALITY NEAR DRUMS/CONTAINERS WITH AN AMU PHOTO IONIZATION DETECTOR AND EXPLOSI-METER.
- H. ERCS RELOCATED DRUM OF ZINC DUST TO AN ISOLATED AREA OF THE WOOD WORKING AREA UNDER A SECTION OF THE IN TACT ROOF TO PROTECT FROM RAIN.
- I. ERCS LAID VISQUEEN ON FACILITY FLOOR TO BE USED AS A DRUM STAGING LINER.
- J. ERCS MOVED IN HIGHLIFT AT 1145 HOURS THIS DATE.

III. FUTURE PLANS

- A. ERCS TO BEGIN STAGING AND INVENTORY OF DRUMS.
- B. FIELD TEST ON ZINC DUST REACTION TO BE PERFORMED AT AN ISOLATED AREA ON SITE, TENTATIVELY SCHEDULED FOR 18 SEPTEMBER, 1987.
- C. FINAL ARRANGEMENTS (AS WELL AS INDEMNIFICATION LETTER PREPARATIONS BY EPA REGIONAL COUNCIL) TO BE MADE FOR FULL SCALE REACTION OF ZINC DUST.
- D. TAT TO PREPARE OPERATION SPECIFIC SAFETY GUIDELINES AND ACT AS SITE SAFETY OFFICERS DURING THE REACTION OF THE ZINC DUST.
- E. OSC UNDERSTANDS THAT THE RCMS IS STILL UNDERGOING FIELD TESTING AND STILL WORKING OUT THE BUGS WITHIN THE SYSTEM. ERCS PROGRAM MANAGEMENT TO MEET WITH TAT PROGRAMMERS AT HEADQUARTERS TO WORK OUT PROBLEMS WITH THE SYSTEM. THE OSC INTENDS TO UTILIZE THE RCMS ON FUTURE REMOVALS.

GARRETT H. ARAI, OSC
U.S.EPA, REGION III
PHILADELPHIA, PA.

To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Tue 22-Sep-87 9:03 EDT Sys 163
Subject: belfield ave poired 86
Mail Id: IPM-163-A70922-081470235

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA.
CERCLA/SARA REMOVAL ACTION
POLREP #26

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1700 HRS, 18 SEPTEMBER, 1987)

- A. PERSONNEL ON SCENE: EPA - 1, TAT - 4, ERCS - 6.
ERCS SUBS - 6.
- B. WEATHER: CLOUDY, INTERMITTENT LIGHT DRIZZLE, TEMPS IN THE
MID 80'S.
- C. ESTIMATED COSTS AS OF 09/17/87:

AGENCY	CURRENT	CEILING
EPA	\$ 4.1K	\$ 30K
ERCS	66.4K	250K
TAT	20.0K	60K
HQ	13.5K	126K

TOTALS	\$103.6K	466K

- D. TAT AND KHONA ON SCENE TO PROVIDE TECHNICAL ASSISTANCE WITH
REACTION OF ZINC DUST.

II. ACTIONS TAKEN

- A. CLEVELAND WRECKING CREW COMPLETED CUTTING AND LOADING
DECONNED SCRAP FROM ROOF AT 1430 HOURS THIS DATE.
ONE TRUCK LOAD OF SCRAP WAS TRANSPORTED OFF SITE THIS
DATE AS WELL AS THEIR GEAR.
- B. CLEVELAND WRECKING PERMANENTLY DEMORED FROM SITE AT 1500
HOURS THIS DATE. ERCS IS RENTING THEIR BOBCAT FOR THE
REMAINDER OF THE CLEANUP.
- C. OSC, TAT AND ERCS MET WITH SPECIAL HAZARDS MANAGEMENT
COMPANY REPS. AT 1130 HOURS THIS DATE TO DISCUSS
ARRANGEMENTS FOR TEST "REACTION " OF ZINC DUST.

- D. SPECIAL HAZARDS MANAGEMENT REPS TOOK TWO SAMPLES (APPROX. 100 GRAMS EACH) FROM DRUM CONTAINING ZINC DUST AT 1315 HRS. ONE WILL BE ANALYZED FOR METALS AND THE OTHER REACTED WITH WATER ON SITE.
- E. A SAMPLE WAS TAKEN TO ROOF OF BUILDING AND MIXED WITH WATER TO TEST FOR REACTION. VERY SLOW OXIDATION REACTION AND SLIGHT CHANGE OF COLOR OCCURED AFTER 15 TO 20 MINUTES. REACTION WAS COMPLETED AFTER APPROX. 45 MINUTES WITHOUT INCIDENT. NO SIGNIFICANT LEVELS OF HYDROGEN WERE DETECTED WITH MONITORING INSTRUMENTS.
- F. SINCE TOP PORTION OF ZINC DUST WAS FOUND TO BE DRY A CORE SAMPLE WAS TAKEN AT 1420 HRS AND THE CONTENTS OF THE DRUM WAS DETERMINED TO BE DRY.
- G. SAMPLING AND REACTING OF ZINC WAS MONITORED CONSTANTLY BY TATS USING OVA AND EXPLOSIMETER. TAT PERFORMED VIDEOTAPING AND PHOTODOCUMENTATION.
- H. SHM CO. REPS, OSC, TAT KSO, OH CHEMIST AND RM HAD A MEETING AT APPR. 1430 HOURS. OSC DECIDED ON OFF SITE TRANSPORT OF ZINC DRUM TO KORA APPROVED FACILITY; OSC WANTS IT OFF SITE ASAP.
- I. DUE TO DETERMINATION OF ZINC DUST BEING COMPLETELY DRY, THE NITROGEN PURGE WAS TAKEN OFF AT 1745 HRS AND THE LID PLACED ON TOP OF THE DRUM TO TRAP ANY GASES EVOLVED. THE NITROGEN TANKS WERE TAKEN OUT OF THE BUILDING.
- J. ERCS MORE CASCADE SYSTEM ON SITE FOR BREATHING AIR TANKS.
- K. ERCS PURCHASE MORE FOAM FOR DIKES DUE TO FAULTY FOAM PURCHASED EARLIER.
- L. ERCS CONTINUE TO MOVE DEBRIS AND LAY VISQUEEN FOR STAGING OF DRUMS AND BUCKETS.
- M. DUE TO THE CONCERN OF THE LEVEL III CHEMIST ON SCENE REGARDING DAMAGED CONTAINERS AS A RESULT OF THE FIRE, OSC ARAI SPOKE WITH FRED HALVORSEN, ERCS HEALTH AND SAFETY DEPT. REGARDING OPENING BULGING DRUMS. A DECISION WAS REACHED TO USE AN EXPLOSION PROOF SHIELD AND REACH AROUND TO LOOSEN BUNG. NO PUNCTURING WILL BE DONE.
- N. OSC ARAI CONTACTED JOHN HADOLSKI, CITY MANAGEMENT OFFICE, TO CANCEL DISPOSAL PLANS FOR ZINC DUST. HE THEN COORDINATED EFFORTS TO NOTIFY PHILA. FIRE MARSHALL AND POLICE DEPT. AS TO STABILITY OF ZINC. FULL SUPPORT WAS RECEIVED BY THE CITY OF PHILA. ON THIS POTENTIAL CRISIS.

2. OSC CONTACTED CYNTHIA MADALESKI TO CANCEL INDEMNIFICATION PROCEEDINGS FOR CITY OF PHILA. WHICH WAS INITIATED BY EPA COUNCIL. THIS OSC HAS NOTHING BUT PRAISE FOR THE EPA REGION III LEGAL COUNCIL SUPPORT THAT WAS ABOVE AND BEYOND THE CALL OF DUTY.

3. DUE TO THE HAZARDS OF THE CUTTING TORCHES OF THE CLEVELAND CLEVELAND WRECKING CREW, POTENTIAL IGNITION SOURCES WERE ELIMINATED FROM THEIR WORK AREAS. PROTECTIVE CLOTHING OF TYPE 1 WERE INADEQUATE DUE TO THEIR KNOWN FLAMMABLE NATURE. AS A RESULT THE CREW WAS ALLOWED TO WORK IN LEVEL D ATTIRE WITH DUST MASKS AND A 5 MINUTE ESCAPE PACK. THE LAST OF THE POOF DEBRIS REMOVED FROM THE CONTAINER PILE CONTAINED VISIBLE EVIDENCE OF DUSTS AND POWDERS FROM BROKEN CONTAINERS WHICH SUBSEQUENTLY CONTAMINATED THE CREW'S ATTIRE. AS A RESULT, AND IN THE BEST INTEREST OF SAFETY, THEIR CLOTHING WAS CONFISCATED BY THE OSC AND SUBSEQUENTLY REPLACED.

III. FUTURE PLANS

- A. ERCS TO CONTINUE STAGING AND INVENTORY OF DRUMS.
- B. LINO DUST TO BE TRANSPORTED OFF SITE TO RCRA APPROVED FACILITY FOR INCINERATION.
- C. ERCS TO SAMPLE AND ARRANGE FOR TREATMENT/DISPOSAL OF DECEN AND RUN OFF WATER BEING COLLECTED IN POOL AS POOL IS NEARLY FULL.

BARRETT H. ARAI, OSC
U.S.EPA, REGION III
PHILADELPHIA, PA.

To: ERD/OERR (EPAS511)
To: T.MASSEY (EPAS374)
From: T.MASSEY (EPAS374) Delivered: Mon 21-Sep-87 10:28 EDT Sys 1
Subject: BELFIELD AVE POLREP #7
Mail Id: IPM-163-870921-094250949

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA.
CERCLA/SARA REMOVAL ACTION
POLREP #27

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1700 HRS, 19 SEPTEMBER, 1987)

- A. PERSONNEL ON SCENE: EPA - 1. TAT - 3. ERCS - 6.
- B. WEATHER: CLOUDY, INTERMITTENT LIGHT DRIZZLE, TEMPS IN THE MID 60'S.
- C. ESTIMATED COSTS AS OF 09/18/87:

AGENCY	CURRENT	CEILING
EPA	\$ 4.3K	\$ 30K
ERCS	128.4K	250K
TAT	22.7K	60K
HQ	26.8K	126K

TOTALS	\$192.2K	466K

II. ACTIONS TAKEN

- A. OSC CHANGED LEVELS OF PROTECTION AT SAFETY MEETING- MODIFIED LEVEL C IN OPEN AREAS AND LEVEL B IN CONFINED AREAS.
- B. OSC. RESPONSE MANAGER AND OH CHEMIST DISCUSSED SAMPLING OF WATER ON SITE. LABS WILL BE LOCATED AND WATER WILL BE TESTED FOR NICKEL, ZINC AND EP TOX TEST.
- C. ERCS CONSTRUCTED STAGING AREA WITH VISQUEEN AND FOAM DIKE.
- D. OSC ARAI SPOKE WITH JOE CERRONE, PHILA. INDUSTRIAL WASTE MANAGEMENT, TO RECEIVE PERMISSION TO PUMP WATER INTO CITY SEWER SYSTEM. OSC STRESSED THAT ONLY WATER AND NO SOLIDS WOULD BE DICHARGED. PERMISSION GRANTED AT APPROX. 1245 HRS.
- E. ERCS BEGAN PUMPING WATER INTO SEWER AT 1415 HRS.
- F. ERCS DISCOVERED AN ANTIMICROBIAL SUBSTANCE, DOWICIL S13, IN DRUM PILE AND STOPPED DISCHARGING WATER AT 1443 HRS.

100190

- G. ERCS MADE LEVEL 8 ENTRY AT 1515 HRS TO INVESTIGATE BASEMENT.
- H. DOWICIL S13 ANTIMICROBIAL AGENT WAS DETERMINED TO BE A POISON, INSOLUBLE IN WATER, AND NOT TO BE DISCHARGED INTO SEWER SYSTEM.
- I. JEC ARAI CALLED JOE CERRONE AGAIN AT 1603 HRS TO WARN HIM OF ANY POSSIBLE RELEASE OF THE POISON INTO THE SEWER. APPROX. 200 GALLONS OF WATER WAS RELEASED.
- J. DOORWAYS TO WOOD SHOP WERE BURNED OFF WITH FOAM AT 1700 HRS TO PREVENT CONTAMINATED RAIN WATER FROM ENTERING ADJACENT PROPERTY.
- K. CONFERENCE CALL WITH A REP. FROM A MANUFACTURING CO. IN PITTSBURG, PA. HE STATED THAT DOWICIL S13 IS USED IN PAINT AS AN ANTIMICROBIAL AGENT AND IS A SKIN IRRITANT WHEN IN POWDER FORM. THERE IS NO IMMEDIATE HAZARD AND HE WILL TRY TO FIND AN MSDS AND CALL BACK.

III. FUTURE PLANS:

- A. ERCS TO SET UP A 12,000 GALLON POOL MORNING OF 20 SEPTEMBER.
- B. ERCS TO COMPLETE INVENTORY, STAGING, AND LOGGING OF ALL DRUMS/CONTAINERS IN EXCLUSION AREA.
- C. ERCS TO INITIATE DRUM SAMPLING OPS.
- D. ERCS TO CONTINUE PUMPING RAIN WATER ACCUMULATION INTO CONTAINMENT POOL.

GARRETT H. ARAI, OSC
U.S.EPA, REGION III
PHILADELPHIA, PA.

100191

To: ERD/OERR (EPA5511)
To: T. MASSEY (EPA9374)
From: T. MASSEY (EPA9374) Delivered: Mon 21-Sep-87 10:29 EDT Sys 1
Subject: BELFIELD AVE POLREP 28
Mail Id: IPM-163-870921-094420426

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA.
CERCLA/SARA REMOVAL ACTION
POLREP #28

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1700 HRS, 20 SEPTEMBER, 1987)

- A. PERSONNEL ON SCENE: EPA - 1. TAT - 2. ERCS - 6.
- B. WEATHER: CLOUDY, TEMPS IN THE LOW 70'S.
- C. ESTIMATED COSTS AS OF 09/18/87:

AGENCY	CURRENT	CEILING
EPA	* 4.3K	* 30K
ERCS	130.4K	250K
TAT	22.7K	60K
HQ	26.8K	126K

TOTALS	*192.2K	466K

- D. RAIN CONTINUES TO POSE PROBLEMS AND DELAYS DUE TO ACCUMULATIONS OF RUN OFF WATER.

II. ACTIONS TAKEN

- A. ERCS SET UP 12,000 GALLON CONTAINMENT POOL AT 1230 HRS.
- B. DECISION WAS MADE THAT ONLY ONE MAN BE IN HI LIFT WHEN STAGING DRUMS TO REDUCE WEIGHT TO INSURE THAT LIFT WEIGHT CAPACITY IS NOT EXCEEDED. LEVEL A "BUDDY" ON FLOOR WITH REMOTE CONTROLS FOR HI LIFT IN CASE OF EMERGENCY.
- C. DOWICIDE S13 OVERPACKED AS WELL AS CONTAMINATED SAND.
- D. ERCS BROUGHT BUCKETS AND DRUMS DOWN FROM PILE AND STAGE ON PALLETS ON VISQUEEN. CHEMIST SCREENING EACH ONE WITH HNU AND EXPLOSIMETER AND COMPILING INVENTORY.
- E. TAT CONTINUES TO PERFORMED SITE, PHOTO, AND VIDEO DOCUMENTATION AND CONTRACTOR MONITORING.
- F. ERCS SUBMITTED COPIES OF ALL DRUM CONTAINER LOGS.

III. FUTURE PLANS:

- A. ERCS TO COMPLETE INVENTORY, STAGING, AND LOGGING OF ALL DRUMS/CONTAINERS IN EXCLUSION AREA.
- B. ERCS TO INITIATE DRUM SAMPLING OPS.
- C. OSC TO CONTACT PHILA. INDUSTRIAL WASTE MANAGEMENT, WASTE WATER TREATMENT, REGARDING USE OF SEWER FOR DISPOSAL OF RAIN WATER ACCUMULATED ON SITE.

GARRETT P. ARMIT, OSC
U.S.EPA, REGION III
PHILADELPHIA, PA.

100192

To: ERD/DEER (EPA8511)
To: T. MASSEY (EPA8374)
From: T. MASSEY (EPA8374) Delivered: Tue 22-Sep-87 9:24 EDT Sys 183
Subject: belfield ave polrep 29
Call ID: IPM-162-870922-064620422

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA REMOVAL ACTION

POLREP #29

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1500 HOURS, 21 SEPTEMBER, 1987)

- A. PERSONNEL ON SCENE: EPA-1, TAT-3, ERCS-2, PAP-2.
- B. WEATHER: TEMP: 70'S, SUNNY.
- C. ESTIMATED COSTS TO DATE:

AGENCY	TO DATE	CEILING
EPA	\$ 4,621	\$ 30K
ERCS	148,732	250K
TAT	24,856	60K
HQ	26,732	125K
TOTALS	204,942	465K

PROJECT CEILING 1,026,000

II. ACTIONS TAKEN

- A. ERCS COMPLETED STAGING DRUMS/MATERIALS FROM PILE ON GROUND LEVEL IN DIKED BERMS.
- B. OSC CONTACTED DONNA SWARTZ OF THE CITY OF PHILA WATER TREATMENT TO DISCUSS DISCHARGE OF ACCUMULATED WASTE WATER.
- C. TWO REPS FROM METHODS RESEARCH ON SCENE TO REMOVE BLUE CONTAINERS FROM BASEMENT. TOTAL COUNT IS 149 BOXES WITH 24 BOTTLES EACH.
- D. OSC AND RM DECIDED TO MOVE SAND BAGS FROM DRUM AREA TO ADJACENT AREA TO ALLOW WORKERS MORE ROOM TO WORK. SAND REMOVAL TO BE DONE IN LEVEL "C" DUE TO THE NON-HAZARDOUS NATURE OF SAND.

- G. CITY OF PHILA. INDUSTRIAL WASTE UNIT INSPECTOR TOOK SAMPLES OF WASTEWATER FROM ACCUMULATION POOL. TWO SAMPLES TAKEN BY OH CHEMIST FROM EACH POOL.
- H. USC, OH CHEMIST AND TAT DISCUSSED SAMPLING OF UNDERGROUND STORAGE TANK. TANK TO BE SAMPLED MORNING OF 22 SEPTEMBER.
- I. AN ADDITIONAL 25 LB CONTAINER OF ZINC METAL DUST WAS FOUND ABOVE FLAMMABLE STORAGE BUNKER.
- J. ERCS CHEMIST CONTINUED TO COMPILE CHEMICAL/MATERIALS INVENTORY.
- K. ERCS CONTINUED TO MOVE PALLETS CONTAINING BAGS OF NON HAZARDOUS MATERIALS FROM PILE TO STAGING AREA.
- L. ERCS INITIATED WASTE DISPOSAL APPROVALS FOR FOUR SEPARATE WASTE STREAMS ON SITE: ZINC POWDER, DEBRIS, WASTEWATER (RAIN AND DECOR) AND WATER FROM AROUND CONTAINERS THAT MAY CONTAIN POISONOUS MATERIALS.

III. FUTURE PLANS

- A. UNDERGROUND STORAGE TANK TO BE SAMPLED MORNING OF 22 SEPTEMBER.
- B. ERCS TO CONTINUE STAGING OF MATERIALS.
- C. ERCS TO CONTINUE INVENTORY COMPILATION.
- D. ERCS TO BEGIN SAMPLING OF ALL CONTAINERS RECOVERED.
- E. ERCS TO OBTAIN WASTE DISPOSAL APPROVALS ASAP.

GARRETT H. ARAI, OSC
US EPA, REGION III
PHILADELPHIA, PA

To: T. MASSEY (EPA9374)
From: T. MASSEY (EPA9374) Delivered: Tue 12-22-87 13:41 EDT Sys 163
Subject: BELFIELD AVE POLREP 30
Mail Id: IPM-163-870322-166680178

BELFIELD AVENUE SITE

CHATELAIN, BELLEVILLE, ILLINOIS, ILLINOIS

CECCLA REMOVAL ACTION

POLREP #30

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1900 HOURS, 22 SEPTEMBER, 1987)

- A. PERSONNEL ON SCENE: EPA-1, TAT-3, ERCS-6, PAP-2.
- B. WEATHER: TEMP: LOW 70'S, PARTLY SUNNY.
- C. ESTIMATED COSTS TO DATE:

AGENCY	TO DATE	CEILING
EPA	* 4,864	* 30K
ERCS	156,503	250K
TAT	25,937	80K
HQ	28,096	126K
TOTALS	215,400	466K

PROJECT CEILING 1,026,000

- D. DURING CLOSING ON 18 SEPTEMBER, OVERHEAD GARAGE DOOR FELL FROM SUPPORTS. ON 21 SEPTEMBER, CREW REMOVED SMASHED DOOR FROM SITE.
- E. OHM INDUSTRIAL HYGIENIST ON SITE TO PERFORM IN-HOUSE INSPECTION OF RESPONSE TECHNICIANS.

II. ACTIONS TAKEN

- A. ADDITIONAL 2 PALLETS OF 5 GALLON BUCKETS DISCOVERED BENEATH RESIDUAL SAND/PALLETS THIS DATE. THIS MATERIAL WAS PLACED IN STAGING AREA.
- B. ERCS CLEANED FLOOR OF ALL MATERIALS (MOSTLY SANDS AND COLORED GRAVELS) THAT HAD SPILLED FROM TORN AND BURNED BAGS DURING DISASSEMBLY OF DRUM PILE. THIS MATERIAL WAS PLACED IN THE CONTAMINATED DEBRIS PILE.

- D. TAT COLLECTED SAMPLES FROM LARGE UNDERGROUND STORAGE TANK AS WELL AS FROM TRENCH NEXT TO TANK. UNABLE TO LOCATE A SECOND SMALLER U.S.T. AT THIS TIME. THE AR WILL HAVE TO BE CONSULTED FOR THIS.
- E. 1 GLASS JAR (APPROX. 1 PINT. 1/2 FULL) WITH CRYSTALS NOTICED AROUND PLASTIC CAP DISCOVERED. JAR LABELED METAL ETHYL PEROXIDE. TAT'S CONTACTED MAILING AND CONTACTS AND OBTAINED MUCH INFORMATION ON THIS MATERIAL. MATERIAL CAN BE SHOCK SENSITIVE AND AN EXPLOSION HAZARD. OHM CONTACTED EXPLOSIVE ORDNANCE DISPOSAL (EOD) WHO RECOMMENDED DETONATION OF THE PRODUCT WITH SOMETHING LIKE A PLASTIC CHARGE AS OPPOSED TO REMOTE OPENING OR BREAKING. THE CHARGE WILL HELP TO DESTROY ALL MATERIALS NOT DETONATED/IGNITED BY REMOTE BURNING TECHNIQUES.
- F. ARP HAS CONTRACTOR ON SITE TO REMOVE LARGE PROPANE TANK ON ROOF. CONTRACTOR HAS GIANT CRANE LIFT ON SITE. HOWEVER, TANK WAS NOT MOVED THIS DATE.
- G. ERCS CHEMIST CONTINUED TO COMPILE CHEMICAL/MATERIALS INVENTORY.
- H. ERCS BEGAN SEGREGATING WASTE STREAMS UNDER CHEMIST SUPERVISION.
- I. ARRANGEMENTS MADE TO HAVE TWO ROLL-OFF DUMPSTERS MOVED TO SITE 23 SEPTEMBER 87 FOR DISPOSAL OF CONTAMINATED DEBRIS.
- J. ASBESTOS REMOVAL CONTRACTOR (DUAL) DELIVERED FINAL REPORT ON ASBESTOS REMOVAL WHICH INCLUDED AIR SAMPLING RESULTS AND DISPOSAL MANIFESTS.
- K. RENTED HI-LIFT BEGANNED AND DEMOED THIS DATE.
- L. OSC CONTACTED CITY OF PHILA. FIRE MARSHALL REGARDING DISCOVERY OF MEK PEROXIDE.
- M. OH CHEMIST TOOK SAMPLES OF MATERIAL FROM DEBRIS PILES.
- N. LOWEST DISPOSAL PRICE FOR ZINC DUST WAS \$1.80 PER POUND THROUGH CHEM WASTE MANAGEMENT TWI FACILITY IN SAUBET, ILL.
- O. RAILING REMOVED FROM DECON AREA TO ALLOW FOR LOADING OF ROLL-OFF BOXES. RAILING TO BE REINSTALLED ASAP.

III. FUTURE PLANS

- A. ERCS TO CONTINUE INVENTORY COMPILATION.
- B. ERCS TO BEGIN SAMPLING OF ALL CONTAINERS RECOVERED.

- C. ERCS TO OBTAIN WASTE DISPOSAL APPROVALS ASAP.
- D. ARRANGEMENTS TO BE MADE FOR DETONATION OF M.E.K. PEROXIDE.
- E. ERCS TO BEGIN REMOVAL OF MATERIALS FROM BASINMENT.
- F. WASTE DISPOSAL PROFILE SHEETS TO BE COMPLETED ON-SITE FOR ALL WASTE MATERIALS.
- G. PROVISIONAL ID NUMBER TO BE OBTAINED THROUGH PADER (CINDY LAWYER).
- H. WASTE CONVERSION INC. REPS TO BE ON SCENE 8-22-87.

GARRETT A. ARAI, ESC
US EPA, REGION III
PHILADELPHIA, PA

100197

To: ERD/OERR (EPAS511)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Thu 24-Sep-87 14:40 EDT Sy:
Subject: BELFIELD AVENUE POLREP 31
Mail Id: IPM-163-870924-132011247

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA REMOVAL ACTION

POLREP #31

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1900 HOURS, 23 SEPTEMBER, 1987)

- A. PERSONNEL ON SCENE: EPA-1, TAT-3, ERCS-7, PRP-2.
- B. WEATHER: TEMP: LOW 70'S, SUNNY.
- C. ESTIMATED COSTS TO DATE:

AGENCY	TO DATE	CEILING
EPA	* 5,050	* 30K
ERCS	160,937	250K
TAT	27,316	60K
HQ	28,996	126K
TOTALS	222,299	466K

PROJECT CEILING 1,026,000

- D. OSC OFF SITE THIS MORNING TO ATTEND MANDATORY REGIONAL SAFETY MEETING.

II. ACTIONS TAKEN

- A. PRP REMOVED PROPANE TANK FROM ROOF OF WAREHOUSE.
- B. ERCS MOVED IN ROLLOFF TO CONTAIN CONTAMINATED DEBRIS PILE.
- C. ERCS TRANSFERRED CONTAMINATED DEBRIS FROM PILE TO ROLLOFF.
- D. ERCS CREW BEGAN DRUM SEGREGATION/COMPATIBILITY TESTING.
- E. JOE CERRONE, CITY OF PHILADELPHIA, CONTACTED OSC, AND STATED THAT THE CITY IS UNABLE TO PROVIDE FOR ANALYSIS OF THE CONTAMINATED WATER SAMPLES TAKEN 9-21-87. THEY WOULD LIKE EPA TO RESAMPLE COLLECTION POOLS, PROVIDE FOR ANALYSIS, AND FORWARD RESULTS TO THE CITY. THEN, THEY WILL DECIDE WHETHER OR NOT THE WASTE BE ACCEPTED BY THE CITY'S WASTE WATER TREATMENT PLANT.
- F. JOHN LEPERATI OF OH MAT. ON SCENE TO MEET WITH RM.

- G. WASTE CONVERSION REP SEAN O'DONNELL CONTACTED TAT TO INFORM OSC THAT HE WOULD NOT BE ON SCENE THIS DATE.
- H. OSC CONTACTED CHARLIE MILLER, A FORMER EMPLOYEE OF THE CERAMICS FACILITY WHICH ONCE OPERATED FROM RENTED SPACE IN THE BUILDING. MOST OF THE MATERIALS UNDER THE COLLAPSED ROOF WERE LEFT BEHIND FROM THIS OPERATION. MR. MILLER PROVIDED MUCH INFORMATION CONCERNING MANY OF THE CONTAINERS IN THE BUILDING. THIS WAS ALL RECORDED BY TAT AND ERCS CHEMISTS. THE FOLLOWING CONCERNS WERE BROUGHT TO THE OSC'S ATTENTION:

PHENYL MERCURIC ACETATE (USED AS A FUNGICIDE IN PAINT) ONE 5 GAL. DRUM.

POSSIBLE PCB CONTAMINATION IN THE EPOXY MANUFACTURED IN THE PLANT.

PHENYL MERCURIC ACETATE AND PCB (AROCHELOR 1242) WERE USED IN THE LAYTEX PAINTS, OF WHICH APPROX. 50 FIVE GAL. PAILS WERE FOUND.

- I. OSC, TAT, AND ERCS DRAFTED SAMPLING PLAN FOR SUSPECTED PAINT/EPOXY CONTAMINATION WITH MERCURY (PAINT) AND PCB (EPOXY).
- J. AS OF 24 SEPTEMBER 87, LEVEL OF PROTECTION INSIDE BUILDING UPGRADED TO LEVEL B AT ALL TIMES, AS PER OSC DIRECTION. EXCLUSION ZONE HAS BEEN EXPANDED TO INCLUDE LOADING DOCK AREA.

III. FUTURE PLANS

- A. ERCS CREWS TO BEGIN OPENING AND SAMPLING DRUMS. COMPATIBILITY TESTING, AND SEGREGATION OF CONTAINERS TO CONTINUE.
- B. OSC TO BE OFF SITE 24 SEPTEMBER FOR MANDATORY REGIONAL SAFETY MEETING.
- C. WASTE CONVERSION INC. REP TO BE ON SCENE AFTERNOON OF 24 SEPTEMBER.
- D. ERCS TO REMOVE MATERIALS FROM BASEMENT AREA.
- E. ERCS TO MOVE IN SPECIAL AIR MONITORING EQUIPMENT TO ANALYZE FOR SUSPECTED AIRBORNE MERCURY CONCENTRATIONS IN THE BUILDING.
- F. OSC TO CONTACT REGIONAL DIOXIN SPECIALIST WALTER LEE DUE TO SUSPECTED PCB'S BURNED IN THE BELFIELD AVENUE FIRE ON JULY 14, 1987.
- G. ERCS TO SEGREGATE PCB CONTAINERS AWAY FROM THE FLAMMABLE MATERIALS.

GARRETT H. ARAI, OSC
US EPA, REGION III
PHILADELPHIA, PA

100199

To: ERD/OERR (EPASS11)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Fri 25-Sep-87 14:00 EDT Sys
Subject: BELFIELD AVE POLREP#32
Mail Id: IPM-163-870925-126050961

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA REMOVAL ACTION

POLREP #32

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1900 HOURS, 24 SEPTEMBER, 1987)

- A. PERSONNEL ON SCENE: EPA-0, TAT-3, ERCS-8. PRP-2.
- B. WEATHER: TEMP: LOW 70'S, SUNNY.
- C. ESTIMATED COSTS TO DATE:

AGENCY	TO DATE	CEILING
EPA	\$ 5,128	\$ 30K
ERCS	166,223	250K
TAT	28,531	60K
HQ	29,982	126K

TOTALS	229,864	466K

PROJECT CEILING 1,026,000

- D. OSC OFF SITE THIS DATE TO ATTEND MANDATORY REGIONAL SAFETY MEETING INVOLVING CONTRACTING TRAINING FROM C.O. MANLEY AND HQ PERSONNEL.

II. ACTIONS TAKEN

- A. ERCS BULK PACKED PAINT CONTAINERS/CONTENTS IN SALVAGE DRUMS.
- B. ERCS MOVED IN MERCURY VAPOR MONITORING INSTRUMENT TO MONITOR FOR SUSPECTED MERCURY VAPOR. INSTRUMENT COULD NOT BE USED, HOWEVER, AND OPERATIONS WERE HINDERED BECAUSE THE UNIT HAD A DEAD BATTERY. INSTRUMENT WAS MOVED IN AS A RESULT OF OSC'S TELEPHONE CONVERSATION WITH FORMER FOREMAN OF PRP ALLIED MOZEL WHO INDICATED THAT PHENYL MERCURIC ACETATE WAS PREVIOUSLY USED IN ALLIED MOZELS PROCESSES. CONTAMINATION REDUCTION CORRIDOR AND EXCLUSION ZONE LINE WERE RELOCATED NEAR THE FRONT ENTRANCE TO THE FACILITY TO ALLOW FOR PROPER PERSONNEL SAFETY AS PHENYL MERCURIC ACETATE IS KNOWN TO EMIT VERY HAZARDOUS VAPORS AT LOW CONCENTRATIONS.

- C. ERCS INSTALLED ADDITIONAL AIRLINE RESPIRATOR LINES.
- D. RP VERNON OPERATED FORKLIFT WITHIN FACTORY AREA. PRP'S CREW OBSERVED MOVING OBJECTS/DEBRIS.
- E. TAT PROVIDED VIDEO DOCUMENTATION OF BULKING OPERATIONS, AND PHOTO DOCUMENTATION OF ALL SITE ACTIVITIES.
- F. FORKLIFT MOVED BY RP FROM BAG MANUFACTURING PLANT TO BURNED FACTORY AREA. IN ORDER FOR THE FORK LIFT TO BE MOVED FROM THE AREA IN WHICH IT WAS STORED, THE CONTAINER STORAGE AREA WAS RELOCATED TO ALLOW ACCESS. APPROXIMATELY THREE HOURS OF ERCS AND TAT TIME WAS REQUIRED TO ACCOMMODATE RP VERNON. PRP PERSONNEL PASSED THROUGH EXCLUSION ZONE WITHOUT PERSONAL PROTECTIVE EQUIPMENT.
- G. TAT AND ERCS MADE SURVEY OF PERIMETER OF SITE.
- H. ADDITIONAL 55 GALLON DRUMS WERE DELIVERED FOR BULKING OPERATIONS.
- I. WASTE CONVERSION INC. REP SEAN O'DONNELL CONTACTED COMMAND POST TO INFORM OSC THAT HE COULD NOT BE ON SITE THIS DATE.
- J. OHM CHEMIST AND TATM CHOCHOLATY TOOK FOUR SAMPLES FROM THE BULK DRUMS OF PAINT.
- K. OHM CHEMIST CONTACTED LABORATORIES TO SOLICIT THREE BIDS FOR SAMPLE ANALYSIS. OSC BELIEVES THIS FUNCTION SHOULD HAVE INVOLVED CORPORATE (IN-HOUSE) SUPPORT WHICH WAS NOT UTILIZED. THIS ACTION IMPEDED SITE ACTIVITIES AND SUBSEQUENTLY PREVENTED THE INITIATION OF IDENTIFICATION AND SAMPLING OPERATIONS AS PREVIOUSLY DIRECTED BY THE OSC. IN THIS INSTANCE, THE CHEMIST PERFORMED THE FUNCTION OF A PCT TO LOCATE A LABORATORY AND OSC CHALLENGED RATES ON DAILIES TO DETERMINE IF CHEMISTS HOURLY RATES WERE APPLICABLE TO WORK PERFORMED.

III. FUTURE PLANS

- A. OSC TO BE ON SITE 25 SEPTEMBER 1987.
- B. WASTE CONVERSION INC. REP TO BE ON SCENE 25 SEPTEMBER, 1987.
- C. ERCS TO CONTINUE IDENTIFICATION AND SAMPLING OPERATIONS.

GARRETT H. ARAI, OSC
US EPA, REGION III
PHILADELPHIA, PA

To: ERD/OERR (EPA5511)
To: T. MASSEY (EPA9374)
From: T. MASSEY (EPA9374) Delivered: Mon 28-Sep-87 16:43 EDT Sys 163
Subject: BELFIELD AVE POLREP 33
Mail Id: IPM-163-870928-150530704

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA REMOVAL ACTION

POLREP #33

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1900 HOURS, 28 SEPTEMBER, 1987)

- A. PERSONNEL ON SCENE: EPA-1, TAT-3, ERCS-8, RRP-2.
- B. WEATHER: TEMP: LOW 60'S, SUNNY.
- C. ESTIMATED COSTS TO DATE:

AGENCY	TO DATE	CEILING
EPA	\$ 5,128	\$ 30K
ERCS	170,205	250K
TAT	28,768	60K
HQ	30,615	126K
TOTALS	234,716	466K

PROJECT CEILING 1,026,000

- D. AS A RESULT OF ERCS PERSONNEL QUESTIONING THE INTEGRITY OF PPE (LEVELS C AND B IN DESIGNATED AREAS) ERCS ERCS IN ON SCENE TO MEET WITH OHM PERSONNEL REGARDING HEALTH THREATS POSED BY MATERIALS ON SITE AND TO EXPLAIN PP&S MEASURES TAKEN AND MEASURES RECOMMENDED BY OHM SAFETY PERSONNEL.

II. ACTIONS TAKEN

- A. TAT CONDUCTED VENDOR SEARCH FOR LOCAL BUSINESSES WHICH MAY BE INTERESTED IN REUSING THE ZINC POWDER AND ALUMINUM POWDER LOCATED ON SITE. TAT SUBMITTED INTERESTED PARTY NAMES TO OSC AFTER TELEPHONE SCREENING.
- B. OSC CONTACTED REGION II OSC KODAMA REGARDING ZINC DUST DISPOSAL. KODAMA RECOMMENDS NOT USING NEW JERSEY ZINC AND SUGGESTED THE POSSIBILITY OF COMBINING A REGION II PROJECT REMOVAL WITH THIS PROJECTS MATERIAL. DUE TO DISTANCE THIS WOULD INVOLVE THIS OPTION IS NOT COST EFFECTIVE.

- C. OSC CONTACTED LARRY FALKIN EPA REGION III COUNCIL AND WAS ADVISED AGAINST RETURNING THE ZINC DUST TO NEW JERSEY ZINC FOR REUSE DUE TO PRIOR RCRA VIOLATIONS AND CONSENT ORDERS AS WELL AS CURRENT STATUS WITH EPA CRES AND RCRA SECTION.
- D. OSC CONTACTED EPA REGION II RCRA SECTION AND STATE OF NEW JERSEY TO INQUIRE IF STATE METAL INDUSTRIES OUT OF CAMDEN, NEW JERSEY IS A VIABLE INTERESTED PARTY TO TAKE CUSTODY OF ZINC DUST AND REUSE THE MATERIAL IN ZINC SMELTING AND METAL SALVAGE OPERATIONS. OSC WAS ADVISED TO PROCEED AS STATE METAL INDUSTRIES IN FACT HAS AN EPA IDENTIFICATION NUMBER WITH NO HISTORY OF RCRA VIOLATIONS.
- D. TAT AND ERCS INITIATED DRUM SAMPLING OPERATIONS THIS DATE. TAT CHEMIST IN LEVEL B TO SCREEN AND COLLECT SAMPLES (VERIFY PHYSICAL CHARACTERISTICS OF MATERIALS AND CONTAINERS) WITH ERCS RT'S AND COMPLETE DRUM LOG DOCUMENTATION.
- E. 55 SAMPLES WERE COLLECTED BY TAT AND ERCS THIS DATE. 64 DRUMS AND CONTENTS WERE VISUALLY INSPECTED AND SCREENED FOR SAMPLING.
- F. ERCS COLLECTED WATER SAMPLES FROM CONTAINMENT POOL FOR DISPOSAL ANALYSIS. SAMPLES TO BE ANALYZED BY WASTE CONVERSION, INC. COMPOSITE SAMPLES OF CONTAMINATED SOLIDS WERE ALSO COLLECTED AND SUBMITTED TO WASTE CONVERSION FOR DISPOSAL ANALYSIS.
- G. TAT CHEMIST AND ERCS RT'S INITIATED SAMPLING OF SOLIDS. 10 SAMPLES WERE COLLECTED THIS DATE.
- H. ERCS CHEMIST CONTINUES TO LINE UP LABORATORY TO ANALYZE DRUM SAMPLES COLLECTED THIS DATE.
- I. OSC SPOKE WITH JOHN HADALSKI, CITY MANAGING DIRECTOR'S OFFICE TO DISCUSS CURRENT SITE STATUS, DISPOSAL OPTIONS FOR CONTAMINATED WATER, AND PRELIMINARY ARRANGEMENTS FOR TREATMENT OF MEK PEROXIDE.
- J. OSC CONTACTED N.E. INDUSTRIAL WASTE REGARDING RECYCLING OF ALUMINUM AND ZINC DUST PRODUCTS. THEY HAVE NO OUTLET FOR THE SMALL QUANTITIES OF MATERIAL ON THIS SITE.

III. FUTURE PLANS

- A. ERCS TO LINE UP LABORATORY TO ANALYZE DRUM SAMPLES.
- B. OSC TO AWAIT DISPOSAL ANALYSIS RESULTS FROM WASTE CONVERSION, INC.
- C. ERCS TO CONTINUE IDENTIFICATION AND SAMPLING OPERATIONS.

- D. ERCS TO RELOCATE AND STAGE ALL CONTAINERS OF 5 GALLON CAPACITY OR MORE WHICH ARE IN THE BASEMENT OF THE FACILITY.
- E. ERCS TO OBTAIN ADDITIONAL DISPOSAL OPTIONS FOR EACH WASTE STREAM.
- F. ALUMINUM AND ZINC DUSTS TO BE TRANSPORTED OFF SITE FOR RECYCLING AT STATE METALS.

GARRETT H. ARAI, OSC
US EPA, REGION III
PHILADELPHIA, PA

To: ERD/OERR (EPASS11)
To: T. MASSEY (EPA9374)
From: T. MASSEY (EPA9374) Delivered: Thu 1-Oct-87 12:20 EDT Sys 163
Subject: Belfield Ave Polrep #34
Mail Id: IPM-163-871001-111060147

BELFIELD AVENUE SITE
PHILADELPHIA, PHILA. COUNTY, PA
CERCLA/SARA REMOVAL ACTION

POLREP #34-SPECIAL BULLETIN

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1800 HOURS, 23 SEPTEMBER, 1987)

- A. ON SEPTEMBER 23, 1987, ON OR ABOUT 1930 HOURS, THE UNDERSIGNED OSC HELD A TELECONFERENCE WITH CHARLES MILLER (FORMER FOREMAN FOR ALLIED MODEL), TAT PERSONNEL, AND ERCS PERSONNEL. THE SUBJECT OF THIS CONVERSATION WAS THE NATURE OF ALLIED MODEL'S OPERATIONS AND SPECIFIC CHEMICALS USED IN THOSE OPERATIONS WHICH WERE CONDUCTED AT THE BELFIELD AVENUE OCCUPANCY WHEN THEY WERE A TENNANT OF BOB VERNON'S.

II. ACTIONS TAKEN

- A. MILLER STATED THAT POLYCHLORINATED BIPHENYLS (PCB'S) BEARING AN "ARACHLOR 1242" WERE IN FACT MIXED WITH PAINT PRODUCTS FOR DIELECTRIC PROPERTY (SO PAINT WOULD RETAIN VISCOSITY).
- B. MILLER STATED THAT PHENYL MERCURIC ACETATE WAS ALSO ADDED TO THE PAINT PRODUCTS TO ACT AS A FUNGICIDE FOR THE PRODUCTS. PHENYL MERCURIC ACETATE IS KNOWN TO EMIT TOXIC VAPORS AT LOW CONCENTRATIONS.
- C. MILLER PROVIDED OSC WITH A LIST OF APPROXIMATELY 20 DIFFERENT MATERIALS WHICH WERE USED BY ALLIED MODEL IN PROCESSES DURING THE TIME THAT MILLER WAS EMPLOYED AS A FOREMAN. MILLER ALSO PROVIDED OSC WITH A GENERAL DESCRIPTION AND/OR INDUSTRIAL APPLICATIONS OF MOST OF THESE MATERIALS.
- D. OSC BRIEFED BILL STEUTEVILLE, CRES ON THE INFORMATION OBTAINED IN THE TELEPHONE CONVERSATION. CRES TO FOLLOW UP HISTORY OF PRP MATTERS INVOLVING USE OF PCB'S WITH TSCA.
- E. OSC DIRECTED TAT AND ERCS TO CONDUCT SAMPLE SCREENING OF CONTAINERS WHICH ARE LABELED WITH ANY OF THESE PRODUCT NAMES BY PERFORMING VISUAL INSPECTIONS OF SAMPLES COLLECTED, SCREENING WITH EXPLOMETER, HNU PHOTO IONIZATION DETECTOR, MERCURY VAPOR ANALYZER, AND PH TESTING. THIS INFORMATION WILL BE USED TO SCREEN ANALYTICAL SERVICES REQUIRED AND AID IN THE COMPOSITING OF MATERIALS FOR ANALYSIS AND EVENTUAL TREATMENT/DISPOSAL.

III. FUTURE PLANS

- A. OSC TO INCLUDE PCB SCREENS IN ANALYTICAL PROCURED FOR THE SAMPLES COLLECTED AS WELL AS THE APPROPRIATE HEAVY METAL ANALYSIS.
- B. ERCS TO REMOVE ALL CONTAINERS OTHER THAN OUTDATED VITAMINS AND PRP'S CLAY PIGMENTS FROM THE BASEMENT OF THE FACILITY TO BE STAGED AND SAMPLED.

GARRETT H. ARAI
ON-SCENE COORDINATOR
US EPA REGION III

100205

To: ERD/DERR (EPAS511)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Mon 28-Sep-87 19:12 EDT Sys 163
Subject: BELFIELD AVE POLREP 35
Mail Id: IPM-163-870928-172851171

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA REMOVAL ACTION

POLREP #35

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1900 HOURS, 28 SEPTEMBER, 1987)

- A. PERSONNEL ON SCENE: EPA-2, TAT-3, ERCS-7,
- B. WEATHER: TEMP: LOW 80'S, SUNNY.
- C. ESTIMATED COSTS TO DATE:

AGENCY	TO DATE	CEILING
EPA	\$ 5,200	\$ 30K
ERCS	178,279	250K
TAT	30,000	60K
HQ	32,022	126K

TOTALS	245,501	466K

PROJECT CEILING 1,026,000

- D. PHIL YOUNIS, OSC ON SCENE TO ASSIST OSC ARAI.

II. ACTIONS TAKEN

- A. TAT ON SCENE SATURDAY, SEPTEMBER 26, 1987 TO IDENTIFY AND PROFILE WASTE STREAMS ON SITE; NINE WASTE STREAMS WERE IDENTIFIED. TAT PREPARED SAMPLING METHODOLOGY, AND PRELIMINARY LIST OF OPTIONS FOR TREATMENT/ DISPOSAL OF WASTE STREAMS.
- B. OSC ON SCENE SATURDAY, SEPTEMBER 26, 1987 TO SIGN DAILY 1900-55'S. OSC ALSO REQUESTED OHM CHEMIST TO PREPARE SAMPLING METHODOLOGY AND WASTE PROFILE SHEETS ON KNOWN AND LABELED CONTAINERS. TAT WAS TO ASSIST CHEMIST WITH THIS EFFORT.
- C. ERCS ON SCENE 09-26-87; UNABLE TO LOAD ROLL OFF TRAILER WITH DEBRIS AS PLANNED. CHEMIST REMAINED TO PREPARE DRUM LOGS FROM FIELD NOTES.

- D. ERCS RELOCATED AND STAGED ALL CONTAINERS 5 GALLONS OR LARGER THAT WERE LOCATED IN THE BASEMENT OF THE FACILITY.
- E. ERCS LOADED ROLL OFF TRAILER WITH DEBRIS. SAMPLES OF CONTAMINATED DEBRIS WERE SENT TO CHEM WASTE MGT. WITH WASTE PROFILE SHEETS.
- F. ERCS CONTINUED DRUM STAGING AND SAMPLING OPS.
- G. ERCS SHIPPED 4 SAMPLES OF PAINT WASTES TO BE ANALYZED FOR PCB'S, PCP, MERCURY, CADMIUM, LEAD, ZINC, AND TOTAL CHROMIUM. SAMPLES TO BE ANALYZED BY PRINCETON LABS IN NEW JERSEY.
- H. ERCS RELOCATED FLAMMABLE MATERIAL TO FLAMMABLE STORAGE ROOM ON THE MAIN FLOOR OF THE FACILITY.
- I. TAT CONTINUES CONTACTOR MONITORING, COST MONITORING, WRITTEN AND PHOTO DOCUMENTATION.

III. FUTURE PLANS

- A. ERCS TO CONTINUE LINEING UP LABORATORIES FOR SAMPLE ANALYSIS.
- B. OSC TO AWAIT DISPOSAL ANALYSIS RESULTS FROM WASTE CONVERSION, INC.
- C. ERCS TO CONTINUE IDENTIFICATION AND SAMPLING OPERATIONS.
- D. OSC TO AWAIT DISPOSAL ANALYSIS FROM CHEM WASTE MANAGEMENT, AND ANALYTICAL RESULTS FROM SAMPLES SHIPPED THIS DATE.
- E. ERCS TO ARRANGE OFF SITE TRANSPORT FOR RECYCLING OF ZINC/ALUMINUM DUST.
- F. ERCS TO OBTAIN ADDITIONAL TREATMENT/DISPOSAL OPTIONS FOR EACH WASTE STREAM.
- G. PHIL YOUNIS, OSC WILL BE ON SCENE 09-29-87 IN OSC ARAI'S ABSENCE. OSC ARAI SCHEDULED TO RETURN 09-30-87.

GARRETT H. ARAI, OSC
 PHIL YOUNIS, OSC
 US EPA , REGION III
 PHILADELPHIA, PA

To: ERD/GERR (EPA5511)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Thu 1-Oct-87 12:34 EDT Sys 163
Subject: BELFIELD AVENUE SITE POLREP #36
Mail Id: 1PM-163-871001-113191130

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA REMOVAL ACTION

POLREP #36

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1900 HOURS. 29 SEPTEMBER, 1987)

- A. PERSONNEL ON SCENE: EPA-1, TAT-2, ERCS-7,
- B. WEATHER: TEMP: LOW 60'S, SUNNY.
- C. ESTIMATED COSTS TO DATE:

AGENCY	TO DATE	CEILING
EPA	\$ 5,300	\$ 30K
ERCS	183,000	250K
TAT	31,000	60K
HQ	32,895	126K

TOTALS	252,195	466K
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PROJECT CEILING 1,026,000

- D. PHIL YOUNIS, OSC. ON SCENE IN OSC ARAI'S ABSENCE.

II. ACTIONS TAKEN

- A. 2 MORE ROLLOFF TRAILERS WERE MOVED IN AND LOADED WITH CONTAMINATED SOLIDS.
- B. SAMPLES OF PAINT PRODUCTS WERE NOT SHIPPED YESTERDAY AS STATED IN POLREP #34: ERCS REPORTED THAT PRINCETON LABS WOULD HAND CARRY TO LAB AT 0900 HOURS THIS DATE. VERBAL ANALYTICAL DATA IS EXPECTED 09-30-87.
- C. ERCS CONTINUED PREPARATION OF FINAL INVENTORY AND MAPS ILLUSTRATING LOCATIONS OF ALL MATERIALS ON SITE WHICH ARE TO BE TREATED/DISPOSED OF.
- D. ERCS SHIPPED 4 SAMPLES OF PAINT WASTES TO BE ANALYZED FOR PCB'S, PCP, MERCURY, CADMIUM, LEAD, ZINC, AND TOTAL CHROMIUM. SAMPLES TO BE ANALYZED BY PRINCETON LABS IN NEW JERSEY.

- E. ERCS RELOCATED FLAMMABLE MATERIAL TO FLAMMABLE STORAGE ROOM ON THE MAIN FLOOR OF THE FACILITY.
- F. TAT CONTINUES CONTACTOR MONITORING, COST MONITORING, WRITTEN AND PHOTO DOCUMENTATION.

III. FUTURE PLANS

- A. ERCS TO CONTINUE MAKING ARRANGEMENTS FOR SAMPLE ANALYSIS .
- B. OSC TO AWAIT DISPOSAL ANALYSIS RESULTS FROM WASTE CONVERSION, INC.
- C. ERCS TO CONTINUE IDENTIFICATION AND SAMPLING OPERATIONS.
- D. OSC TO AWAIT DISPOSAL APPROVALS FROM CHEM WASTE MANAGEMENT, AND WASTE CONVERSION.
- E. ERCS AND TO ARRANGE OFF SITE TRANSPORT FOR RECYCLING OF ZINC/ALUMINUM DUST.
- F. ERCS AND TAT TO OBTAIN ADDITIONAL TREATMENT/DISPOSAL OPTIONS FOR EACH WASTE STREAM.
- G. ERCS TO INITIATE DECON OF WOOD WORKING ROOM (WALLS AND FLOOR) AND EQUIPMENT.
- H. PARTIAL DEMOBE IS TENTATIVELY SCHEDULED FOR 10-01-87.

GARRETT H. ARAI, OSC
PHIL YOUNIS, OSC
US EPA , REGION III
PHILADELPHIA, PA

100209

To: ERD/DERR (EPAS511)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Thu 1-Oct-87 13:38 EDT Sys 163
Subject: BELFIELD AVE POLREP #37
Mail Id: 1PM-163-871001-122740894

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA REMOVAL ACTION

POLREP #37

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (2030 HOURS, 30 SEPTEMBER, 1987)

- A. PERSONNEL ON SCENE: EPA-1, TAT-2, ERCS-7.
- B. WEATHER: RAIN. TEMP: LOW 70'S.
- C. ESTIMATED COSTS TO DATE:

AGENCY	TO DATE	LEILING
EPA	\$ 5,400	\$ 30K
ERCS	188,421	250K
TAT	32,000	60K
HQ	33,873	126K

TOTALS	259,694	466K

PROJECT CEILING 1,026,000

II. ACTIONS TAKEN

- A. ADDITIONAL ROLLOFF CONTAINER DELIVERED THIS DATE.
- B. ERCS CREW LOADED ONE ROLLOFF WITH CONSTRUCTION DEBRIS. TOTAL OF FIVE 20 CY ROLLOFFS FILLED TO DATE.
- C. ERCS BEGAN DECON OF BUILDING FLOOR, FIXTURES, AND ERCS EQUIPMENT IN PREPARATION FOR PARTIAL DEMOBE.
- D. OSC AWAITING ANALYTICAL RESULTS FROM PRINCETON LABS. 24 HOUR TURNAROUND WAS NOT DELIVERED DUE TO EXTRACTION LIMITATIONS INHERENT IN THE SAMPLE MATRIX (LATEX PAINT PRODUCTS).
- E. ERCS COMPLETED STAGING AND SAMPLING 55 GALLON DRUMS.
- F. OSC DIRECTED ERCS TO SAMPLE AND SCREEN PRODUCTS IN 5 GALLON PAILS FOLLOWING THE SAME SAMPLING METHODOLOGY USED FOR DRUM SAMPLING OPERATIONS AND SAMPLE SCREENING PROCEDURES.

- G. OSC RECEIVED PROVISIONAL GENERATOR ID WPA00000002242 FROM PA DER

III. FUTURE PLANS

- A. ERCS TO CONTINUE DECON OF EQUIPMENT AND BUILDING.
- B. DISPOSAL OPTIONS WILL BE EVALUATED BY OSC BASED UPON ANALYTICAL RESULTS OF DRUM SAMPLES AND PAINT PRODUCT SAMPLES.
- C. ERCS TO PERFORM BULKING OPERATIONS AS NEEDED BASED UPON ANALYTICAL RESULTS.
- D. OSC TO AWAITING DISPOSAL APPROVAL FROM CHEM WASTE MANAGEMENT AND WASTE CONVERSION.
- E. ERCS TO ARRANGE OFF SITE TRANSPORT FOR RECYCLING OF ZINC/ALUMINUM DUST.
- F. ERCS AND TAT OBTAINING ADDITIONAL TREATMENT/DISPOSAL OPTIONS FOR EACH WASTE STREAM.
- G. ERCS TO INITIATE PARTIAL DEMORE OF PERSONNEL AND UNNECESSARY EQUIPMENT.
- H. ERCS TO SCREEN AND/OR SAMPLE APPROXIMATELY 300 5 GALLON PAILS ON SITE.
- I. CITY OF PHILADELPHIA INDUSTRIAL WASTE (TOM HEALEY) REQUESTS WRITTEN DOCUMENTATION VERIFYING TREATMENT OF RUNOFF AND DECON WATERS ON SITE PRIOR TO DISCHARGE INTO SEWER SYSTEM. WATER DEPARTMENT HAS VERBALLY CONSENTED TO ALLOW THIS PROJECT TO DISCHARGE INTO THE COMBINED SEWER SYSTEM AFTER TREATMENT VIA CARBON FILTRATION.

GARRETT H. ARAI, OSC
US EPA, REGION III
PHILADELPHIA, PA

To: T. MASSEY (EPA9374)
From: T. MASSEY (EPA9374) Delivered: Thu 1-Oct-87 17:19 EDT Sys 163
Subject: BELFIELD AVE POLREP 38
Mail Id: IPM-163-871001-155910527

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA REMOVAL ACTION

POLREP #38

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (2030 HOURS, 01 OCTOBER, 1987)

- A. PERSONNEL ON SCENE: EPA-2, TAT-2, ERCS-7.
- B. WEATHER: PARTLY CLOUDY, TEMP: MID 60'S.
- C. ESTIMATED COSTS TO DATE:

AGENCY	TO DATE	CEILING
EPA	* 5,600	* 30K
ERCS	193,700	250K
TAT	36,000	60K
HQ	35,295	126K
TOTALS 270,595		466K

PROJECT CEILING 1,026,000

- D. OSC YOUNIS ON SCENE TO ASSIST OSC ARAI WITH COORDINATION OF SITE ACTIVITIES.

II. ACTIONS TAKEN

- A. SIXTH ROLL OFF BOX MOVED IN AND LOADED WITH CONTAMINATED SOLIDS.
- B. ERCS COMPLETED DECON OF BUILDING WALLS, FLOOR, FIXTURES, BOBCAT, AND ERCS EQUIPMENT IN PREPARATION FOR PARTIAL DEMOBE.
- C. OSC AWAITING ANALYTICAL RESULTS FROM PRINCETON LABS. 24 HOUR TURNAROUND WAS NOT DELIVERED DUE TO EXTRACTION LIMITATIONS INHERENT IN THE SAMPLE MATRIX (LATEX PAINT PRODUCTS).
- D. OSC APPROVED CHANGES IN SAMPLING PLAN TO INCLUDE SAMPLING OF ALL CONTAINERS ON SITE BECAUSE OF SUSPECTED CROSS CONTAMINATION BETWEEN UNSEALED CONTAINERS.
- E. ERCS DEMOBE 1 RT THIS DATE.

7-11

F. TAT CONTINUED PHOTO DOCUMENTATION, SITE DOCUMENTATION, CONTRACTOR AND COST MONITORING.

G. OSC CONTACTED REGIONAL DIOXIN EXPERT (WALTER LEE) OF THE POSSIBILITY OF THE GENERATION OF DIOXIN FROM THE FIRE DUE TO SUSPECT PCB/PCP CONTAMINATION. LEE INFORMED OSC THAT ACTION LEVEL FOR DIOXIN IS 1 PPB.

H. OSC WAS INFORMED BY REGIONAL COUNCIL (CYNTHIA NADOLSKI) THAT PRP VERNON HAS COMPLETED ALL ACTIVITIES AS AGREED UPON IN THE CONSENT ORDER.

I. OSC INFORMED CRES (STEUTEVILLE) THAT DAMAGED CONTAINERS AND HAZARDOUS MATERIALS/WATES STILL EXIST ON THE VISUAL PACKAGING PORTION OF THE FACILITY AND FURTHER, THAT VERNON STATED TO THE OSC ON PRIOR OCCASIONS THAT HE COULD PROPERLY DISPOSE OF ALL MATERIALS PREVIOUSLY USED IN THIS AREA.

III. FUTURE PLANS

A. ERCS TO MOVE IN ADDITIONAL SAMPLING EQUIPMENT 10-02-07.

B. DISPOSAL OPTIONS WILL BE EVALUATED BY OSC BASED UPON ANALYTICAL RESULTS OF DRUM SAMPLES AND PAINT PRODUCT SAMPLES.

C. ERCS TO PERFORM BULKING OPERATIONS AS NEEDED BASED UPON ANALYTICAL RESULTS.

D. OSC TO AWAITING DISPOSAL APPROVAL FROM CHEM WASTE MANAGEMENT AND WASTE CONVERSION.

E. ERCS TO TRANSPORT ZINC/ALUMINUM DUST TO STATE METALS.

F. ERCS AND TAT OBTAINING ADDITIONAL TREATMENT/DISPOSAL OPTIONS FOR EACH WASTE STREAM.

G. ERCS TO INITIATE PARTIAL DEMORE OF PERSONNEL AND UNNECESSARY EQUIPMENT.

H. TAT AND ERCS TO SCREEN AND/OR SAMPLE APPROXIMATELY 300 5 GALLON PAILS ON SITE. SAMPLES WILL ALSO BE COLLECTED FROM REMAINDER OF LABELED DRUMS ON SITE WHICH WERE THOUGHT TO CONTAIN PURE PRODUCTS. THESE DRUM SAMPLES WILL BE ANALYZED FOR PCB'S, PCP AND HG.

I. FAS JOAN HENRY TO BE ON SCENE 10-02-07 TO AUDIT SITE FILE AND COST MONITORING EFFORTS BY TAT.

J. OSC AND STEUTEVILLE TO SCRUTINIZE CONSENT ORDER SIGNED ON SUBSTANCES EXISTING ON THE VISUAL PACKAGING SITE.

To: ERD/DERA (EPA8511)
To: T. MASSEY (EPA9374)
From: T. MASSEY (EPA9374) Delivered: Mon 5-Oct-87 18:39 EDT Sys 163
Subject: BELFIELD AVE POLREP #39
Mail To: (PM-163-871005-167030421)

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA REMOVAL ACTION

POLREP #39

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (2030 HOURS, 02 OCTOBER, 1987)

- A. PERSONNEL ON SCENE: EPA-3, TAT-2, ERCS-6.
- B. WEATHER: SUNNY. TEMP: LOW 70'S
- C. ESTIMATED COSTS TO DATE:

AGENCY	TO DATE	CEILING
EPA	\$ 6,100	\$ 30K
ERCS	198,070	250K
TAT	36,000	60K
HQ	36,026	125K
TOTALS	276,195	465K

PROJECT CEILING 1,026,000

- D. OSC YOUNIS ON SCENE TO ASSIST OSC ARAI WITH COORDINATION OF SITE ACTIVITIES.
- E. FAS JOAN HENRY ON SCENE TO AUDIT SITE FILES, LOGS, AND COST MONITORING STATUS.

II. ACTIONS TAKEN

- A. ERCS COMPLETED SAMPLING 55 GALLON DRUMS.
- B. ERCS DEMOED DECON TRAILER EVENING OF 10-01-87.
ERCS DEMOED ROBCAT AT 0900 HOURS THIS DATE.
- C. OSC AWAITING ANALYTICAL RESULTS FROM PRINCETON LABS.
24 HOUR TURNAROUND WAS NOT DELIVERED DUE TO EXTRACTION LIMITATIONS INHERENT IN THE SAMPLE MATRIX (LATEX PAINT PRODUCTS). VERBALS WERE DO THIS AM.
- D. TAT AND ERCS INITIATED SAMPLING OF APPROXIMATELY 300 5 GALLON PAILS; 90 OF THE 300 PAILS WERE SAMPLED THIS DATE.

- E. TAT CONTINUES PHOTO DOCUMENTATION, SITE DOCUMENTATION.
- F. TAT MOVED IN 30 CASES OF 8 OZ. SAMPLE JARS DUE TO TIME CONSTRAINTS INVOLVED IF ERCS SHIPPED THEM.
- G. OSC CONTACTED SEVERAL MANUFACTURERS REGARDING PRODUCTS ON SITE. REPRESENTATIVES REQUESTED THAT OSC GET BACK IN TOUCH WITH THEM WHEN ANALYTICAL DATA WAS AVAILABLE TO CONFIRM IDENTITY AND PURITY OF THE PRODUCTS IN QUESTION.
- H. OSC CONTACTED PRP VERNON REGARDING DISPOSAL STATUS OF MATERIALS STILL EXISTING ON THE VISUAL PACKAGING PROPERTY. PRP HAS STAGED SOME OF THE MATERIALS AND IS IN THE PROCESS OF IDENTIFYING USEABLE MATERIALS. RETURNING MATERIALS TO MANUFACTURERS, AND DISPOSING OF UNUSEABLE MATERIALS. APPROXIMATELY 40, 5 GALLON CONTAINERS OF CERAMIC GLAZE MATERIALS LABELLED WITH THE CHARL-STAN COMPANY LABEL CAN BE REUSED BY PRP VERNON TO WYNCOTE ACADEMY AND WORDSWORTH ACADEMY. OSC AGREES TO GIVE VERNON THESE MATERIALS FOR PROPER DISTRIBUTION AND USE TO PREVENT PROJECT FROM INCURRING DISPOSAL COSTS.
- I. ZINC AND ALUMINUM METALS WERE SHIPPED ON THIS DATE. STATE OFFICIALS REJECTED THE MATERIALS THINKING THAT THESE MATERIALS WERE METAL SHAVINGS AND NOT PURE DUSTS. THEY COULD NOT USE THESE MATERIALS IN THEIR PROCESS.
- J. ERCS OBTAINS ANOTHER POTENTIAL REUSER (F.W. WINTER, INC. AND COMPANY) OF THE ZINC AND ALUMINUM MATERIALS. AN INSPECTION IS TO BE PERFORMED ON SCENE BY THE POTENTIAL REUSER ON MONDAY, 10-5-87. PRIOR TO RELEASE OF ANY MATERIALS.

III. FUTURE PLANS

- A. OSC AWAITING ANALYTICAL RESULTS OF DRUM SAMPLES AND PAINT PRODUCT SAMPLES.
- B. ERCS TO PERFORM BULKING OPERATIONS AS NEEDED BASED UPON ANALYTICAL RESULTS.
- C. OSC AWAITING DISPOSAL APPROVALS FROM CHEM WASTE MANAGEMENT AND WASTE CONVERSION.
- E. ERCS AND TAT TO CONTINUE SAMPLING OPERATIONS.
- F. ERCS AND TAT OBTAINING ADDITIONAL TREATMENT/DISPOSAL OPTIONS FOR EACH WASTE STREAM.
- G. TAT AND ERCS TO SCREEN AND/OR SAMPLE APPROXIMATELY 170 MORE 5 GALLON PAILS ON SITE.
- H. FAS JOHN HENRY TO BE ON SCENE 10-03-87 TO CONTINUE AUDITING SITE FILE AND COST MONITORING EFFORTS BY TAT AND ACT AS OSC REP.

GARRETT H. ARAL, OSC
US EPA, REGION III
PHILADELPHIA, PA

JOAN HENRY, FAS
OSC REP.

100215

To: ERD/DERR EPAS811)
To: T. MASSEY (EPAS374)
From: T. MASSEY (EPAS374) Delivered: Mon 5-Oct-87 18:40 EDT Sys 123
Subject: BELFIELD AVE POLREP #40
Mail Id: EPM-163-B'1005-168116572

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA REMOVAL ACTION

POLREP #40

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (1800 HOURS, 03 OCTOBER, 1987)

- A. PERSONNEL ON SCENE: EPA-2, TAT-2, ERCS-2.
- B. WEATHER: COLD, RAIN, TEMPS. IN LOW 60'S.
- C. ESTIMATED COSTS TO DATE: (AS OF 10/1/87)

AGENCY	TO DATE	CEILING
EPA	\$ 6,576	\$ 30K
ERCS	202,271	250K
TAT	36,334	60K
HQ	36,800	126K
TOTALS	281,991	466K

PROJECT CEILING 1,026,000

- D. OSC YOUNIS ON SCENE.
- E. FAS JOAN HENRY ON SCENE TO AUDIT SITE FILES, LOGS, AND COST MONITORING STATUS.

II. ACTIONS TAKEN

- A. ERCS COMPLETED SAMPLING DRUMS AND PAILS, PCB PAIL, TWO AMMONIUM HYDROXIDE PAILS, AND 6 1000 GAL. TANKS TO BE SAMPLED MONDAY (10/5/87).
- B. ERCS STARTED TO DECON EQUIPMENT BUT DID NOT FINISH DUE TO HEAVY RAIN AND WIND.
- C. TAT CONTINUES PHOTO DOCUMENTATION, SITE DOCUMENTATION, CONTRACTOR AND COST MONITORING.
- D. FAS HENRY AND ERCS RM UPDATED COST TRACKING AND DAILY WORK ORDERS.
- E. ERCS FOREMAN DEMOBLED OFF SITE.

- F. ONE FIVE GALLON CAN (APPROX. 50 LB.) OF A GOLD POWDER WAS LOCATED ON SITE. CAN WAS LABELED ALCAN GOLD DUST.
- G. TAT INSTALLED DATA BASE FILE TO LOAD INVENTORY AND DRUM LOG INFO FOR TREATMENT/DISPOSAL CROSS REFERENCE.

III. FUTURE PLANS

- A. OSC AWAITING ANALYTICAL RESULTS OF DRUM SAMPLES AND PAINT PRODUCT SAMPLES.
- B. ERCS TO PERFORM BULKING OPERATIONS AS NEEDED BASED UPON ANALYTICAL RESULTS.
- C. OSC AWAITING DISPOSAL APPROVALS FROM CHEM WASTE MANAGEMENT AND WASTE CONVERSION.
- D. ERCS AND TAT OBTAINING ADDITIONAL TREATMENT/DISPOSAL OPTIONS FOR EACH WASTE STREAM.
- E. FAS JOAN HENRY TO BE ON SCENE 10-03-87 TO CONTINUE AUDITING SITE FILE AND COST MONITORING EFFORTS BY TAT AND ACT AS OSC REP.

GARRETT H. ARAY, OSC
US EPA, REGION III
PHILADELPHIA, PA

JOAN HENRY, FAS
OSC REP.

To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Tue 6-Oct-87 8:53 EDT Svs 163 (1.
Subject: belfield ave polrep #41
Mail Id: 1PM-163-871006-080070754

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA/SARA REMOVAL ACTION

POLREP #41

ATTN: TOM MASSEY AND TIM FIELDS

I. SITUATION (2130 HOURS, 5 OCTOBER, 1987)

- A. PERSONNEL ON SCENE: EPA-2; TAT-2; ERCS-5.
B. ESTIMATED COSTS TO DATE (AS OF 4 OCTOBER, 1987):

AGENCY	CURRENT	CEILING
EPA	\$ 6,884	* 30K
TAT	37,036	60K
ERCS	208,904	250K
HQ	39,373	126K
TOTALS	\$ 292,197	466K

CURRENT PROJECT CEILING IS 1,026,000

- C. FAS JOAN HENRY ON SCENE TO ASSIST OSC ARA1.
D. WEATHER: SUNNY, BREEZY, TEMPS IN THE LOW 70'S.
E. ERCS CONTINUING PREPARATIONS FOR PARTIAL DEMOBE.

II. ACTIONS TAKEN

- A. F.W. WINTER, INC AND COMPANY REP. ON SCENE TO INSPECT METAL POWDERS FOR POSSIBLE RECLAMATION. REP. STATED TO OSC THAT HE MAY BE INTERESTED IN REUSING THE PRODUCTS. OSC DIRECTED ERCS TO OBTAIN ANALYTICAL DATA TO SUPPORT THAT THE CONTENTS OF THE CONTAINERS ARE IN FACT PURE PRODUCT.
B. ERCS COMPLETED BULKING OF APPROX. 100 CONTAINERS WHICH ARE 1 GALLON CAPACITY OR LESS. THREE WASTE STREAMS WERE GENERATED AND CONTAINED IN DRUMS: PAINTS; RESINS; AND ADHESIVES.
C. ERCS SAMPLED THE ABOVE BULKED WASTE STREAMS.
D. ERCS SAMPLED 1 GALLON CAPACITY OR LESS CONTAINERS WITH UNKNOWN MATERIALS.
E. BILL STEUTEVILLE, CRES INFORMED OSC THAT PAP VERNON AND

FORMER OWNER OF ALLIED MOZEL HAVE BEEN GIVEN VERBAL NOTICE OF THEIR PRP STATUS, HOWEVER, CRES AND EPA REGIONAL COUNCIL REQUEST WRITTEN FOLLOW UP BY USC .

- F. TAT CONTACTED ALCOA REGARDING "GOLD DUST". ALCOA REP. STATED THAT PRODUCT WAS COMPRISED OF APPROX. 80% CU; 20% ZN; AND 3-4% STEARIC ACID.
- G. ERCS CHEMIST INFORMED USC THAT SAMPLES PREVIOUSLY THOUGHT TO BE LATEX PAINTS ARE IN FACT SOME OF THE "CHARLESTAN" GLAZING COMPOUNDS. MATERIALS WERE MISIDENTIFIED DUE TO THE MELTED CONTAINERS AND SIMILARITY BETWEEN THE PHYSICAL APPEARANCE OF THE PRODUCTS.
- H. OSC DIRECTED TAT TO PREPARE OPTIONS ANALYSIS/FEASABILITY STUDY TO BE UTILIZED AS A DECISION MAKING TOOL FOR TREATMENT/DISPOSAL OF MATERIALS ON SITE.

III. FUTURE PLANS

- A. OSC CONTINUES TO WAIT ANALYTICAL RESULTS OF DRUM SAMPLES AND GLAZING PRODUCTS.
- B. TAT AND ERCS CONTINUING TO SEEK ADDITIONAL TREATMENT/DISPOSAL OPTIONS.
- C. OSC AWAITING DISPOSAL APPROVALS FROM CHEM WASTE MANAGEMENT AND WASTE CONVERSION.
- D. ERCS TO COMPLETE SITE PREP FOR PARTIAL DEMOBE (TENTATIVE DEMOBE DATE IS 10-06-87).
- E. OSC ESTIMATES DURATION OF PARTIAL DEMOBE AT APPROXIMATELY THREE MONTHS DUE TO LENGTHY TIME REQUIRED TO COMPILE ANALYTICAL AND DISPOSAL APPROVALS.
- F. STEUTEVILLE, CRES TO PROVIDE OSC WITH NAME AND ADDRESS OF FORMER OWNER OF ALLIED MOZEL.
- G. OSC TO PROVIDE FOLLOW UP WRITTEN DOCUMENTATION THAT BOTH PRP VERNON AND FORMER OWNER OF ALLIED MOZEL HAVE BEEN PUT ON NOTICE.
- H. HQ POLICY STAFF (ARTHUR WEISSMAN) TO ARRIVE ON SCENE 10-06-87.
- I. OSC SPOKE TO OAKITE CO. WHO APPROVED OF REUSING/DISPOSING OF ONE DRUM OF PRODUCT THAT BEARS THEIR MANUFACTURING LABEL. THIS DRUM IS TO BE SAMPLED TO OBTAIN ANALYTICAL DATA TO VERIFY THAT NO CROSS CONTAMINATION HAS OCCURRED. MATERIAL WILL THEN BE RETURNED TO OAKITE CO.
- J. TAT TO COMPLETE DBASE INVENTORY OF ALL MATERIALS ON

SITE.

- K. OSC CONTACTED DUPONT IN AN EFFORT TO HAVE THEM INVOLVED IN THE RECYCLING OF PRODUCTS BEARING THEIR MANUFACTURING LABELS. DUPONT REP. DID NOT DEMONSTRATE

A WILLINGNESS TO ASSIST OSC IN THIS MATTER, AND IN FACT RECOMMENDED THAT OSC DISPOSE OF THE ACID CONTAINED IN THE DRUM AS DUPONT WOULD NOT INCUR THE EXPENSE.

- L. TAT TO BEGIN PRELIMINARY OPTIONS ANALYSIS/FEASABILITY STUDY WHEN ANALYTICAL DATA IS RECEIVED FROM ALL WASTE STREAMS ON SITE.

GARRETT H. ARAI, OSC
JOAN HENRY, FAS. CSC REP.
US EPA, REGION III
PHILADELPHIA, PA

100220

BELFIELD AVENUE SITE
PHILADELPHIA, PA
CERCLA REMOVAL ACTION

ATTN: TIM FIELDS AND MIKE ZICKLER

SPECIAL BULLETIN - PROJECT STATUS

I. SITUATION (1200 HOURS, FRIDAY, OCTOBER 30, 1987)

- A. 95 DRUMS STAGED; 55 DRUMS COLLECTED FOR ANALYSIS.
- B. OSC AWAITS ANALYSIS RESULTS TO DETERMINE CONTENTS OF PCP, PCB AND MERCURY.
- C. OSC CANNOT DETERMINE FORMAL CLOSURE DATE AT THIS TIME DUE TO ONGOING SITE STATUS AWAITING DISPOSAL ANALYSIS.

II. ACTIONS TAKEN

- A. SITE REMAINS ON HOLD PENDING ANALYSIS. UPON RECEIPT OF FIRST SET OF SCREENING ANALYSIS, DISPOSAL METHODOLOGIES WILL BE DETERMINED.
- B. OSC IS MAINTAINING 24-HOUR SECURITY WITH GUARD DOGS DUE TO ACCESSIBILITY AND LOGISTICS OF SITE.
- C. OSC AWAITING APPROVAL TO DISPOSE OF 15,000 GALLONS OF CONTAMINATED WATER.

III. FUTURE PLANS

- A. DISPOSAL OF WATER TO BE EFFECTED UPON RECEIPT OF DISPOSAL ANALYSIS.
- B. OSC AWAITING DRUM ANALYSIS.
- C. OSC REPORT TO BE DRAFTED AND SUBMITTED IN ACCORDANCE WITH THE NCP UPON FINAL SITE CLOSURE AS DETERMINED BY THE OSC.

GARRETT ARAI, OSC
U.S. EPA, REGION III
PHILADELPHIA, PA

BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA COUNTY, PA
CERCLA/SARA REMOVAL ACTION

POLREP #42--SPECIAL BULLETIN

ATTN: MIKE ZICKLER AND TIM FIELDS

I. SITUATION (1000 HOURS, 23 NOVEMBER, 1987)

A. OSC PHIL YOUNIS TO ASSUME SITE LEAD RESPONSIBILITIES DURING OSC ARAI'S ADMINISTRATIVE LEAVE ABSENCE IN ORDER TO ASSURE THAT SITE PROGRESS CONTINUES WHILE AWAITING DISPOSAL APPROVALS FOR WASTE STREAMS IDENTIFIED AT THE SITE.

II. FUTURE PLANS

- A. OSC CONTINUES TO AWAIT ANALYTICAL RESULTS OF DRUM SAMPLES AND GLAZING PRODUCTS.
- B. TAT AND ERCS CONTINUING TO SEEK ADDITIONAL TREATMENT/DISPOSAL OPTIONS.
- C. OSC AWAITING DISPOSAL APPROVALS FROM CHEM WASTE MANAGEMENT AND WASTE CONVERSION.
- D. TAT TO BEGIN PRELIMINARY OPTIONS ANALYSIS/FEASIBILITY STUDY WHEN ANALYTICAL DATA IS RECEIVED FROM ALL WASTE STREAMS ON SITE.

PHIL YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

To: ERD/OERR (EPA5511)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Wed 23-Dec-87 12:02 EST Sys 163
Subject: BELFIELD AVE. SITE POLREP 43
Mail Id: 1PM-163-871223-108350102

POLREP #43
BELFIELD AVE. SITE
GERMANTOWN, PHILADELPHIA, PA.
CERCLA/SARA EMERGENCY REMOVAL

ATTN: ROBERT E. CARON AND TIM FIELDS

I. SITUATION (12-22-87:1500HRS)

A. ERCS, EPA AND TAT REMOBE TO SITE ON 12-18-87 FOR DISPOSAL OF; 1) CONTAMINATED DEBRIS STAGED IN 20 CU. YARD ROLL OFF CONTAINERS, AND 2) COLLECTED DECON AND RAIN WATER. CONTAINMENT POOL ALSO TO BE DISASSEMBLED, WITH THE LINER TO BE PLACED IN ONE OF THE ROLL OFF CONTAINERS.

B. PERSONNEL ON SCENE: ERC'S - 2
TAT - 1
EPA - 1
SECURITY - 2

II. ACTIONS TAKEN

A. FIVE ROLL OFF BOXES WITH CONTAMINATED DEBRIS TRANSPORTED OFF SITE TO TSD FACILITY (WASTE CONVERSIONS, HATFIELD, PA.) ON 12-17, 18 -87. DEBRIS WAS MANIFESTED AS HAZARDOUS WASTESOLID, N.O.S. (GENERATOR ID # PAPO00002242.

B. TWO 5000 GALLON TANK TRUCKS ON SITE 12-21-87. CONTAINMENT POOL PUMPED OUT AND LIQUID TRANSPORTED TO CHEM-CLEAR, CHESTER PA. FOR TREATMENT/DISPOSAL. POOL LIQUID LISTED AS NON-REGULATED NON-HAZARDOUS WASTE WATER N.O.S.

C. CONTAINMENT POOL DISASSEMBLED AND DEMOED THIS DATE. POOL LINER PLACED IN REMAINING ROLL- OFF CONTAINER.

D. ERCS DEMOBE THIS DATE.

III. FUTURE PLANS

A. REMAINING ROLL-OFF CONTAINER TO BE TRANSPORTED OFF SITE ON 12-23-87, (ALSO GOING TO WASTE CONVERSIONS MANIFESTED IDENTICALLY AS OTHER ROLL-OFFS.)

B. OSC TO COORDINATE WITH ERCS FOR DISPOSAL OF REMAINING WASTE STREAMS UPON RECEIPT OF ANALYTICAL.

C. GAURD SERVICE TO REMAIN ON SITE UNTIL ALL WASTES HAVE BEEN REMOVED FROM THE PREMISES.

100223

PHILIP C. YOUNIS, OSC
U.S.EPA REGION III
PHILADELPHIA, PA

To: ERD/OERR (EPA5511)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Wed 23-Dec-87 12:03 EST Sys 163
Subject: BELFIELD AVE SITE POLREP 44
Mail Id: IPM-163-871223-108520524

POLREP #44
BELFIELD AVE. SITE
GERMANTOWN, PHILADELPHIA, PA.
CERCLA/SARA EMERGENCY REMOVAL

ATTN: ROBERT E. CARON AND TIM FIELDS

I. SITUATION(12-23-87; 1000HRS)

- A. TAT ON SITE THIS DATE TO OVERSEE REMOVAL OF THE ONE
REMAINING 20 CU. YARD ROLL-OFF BOX CONTAINING CONTAMINATED
DEBRIS.

II. ACTIONS TAKEN

- A. LAST REMAINING ROLL-OFF BOX TRANSPORTED TO WASTE
CONVERSIONS, HATFIELD, PA. FOR TSD AT 0900 HOURS THIS DATE.
THIS WASTE IS ALSO LISTED AS HAZARDOUS WASTE SOLID, N.O.S.
AS WERE PREVIOUS ROLL-OFFS TRANSPORTED OFF SITE ON
12- 17,18 -87.

III. FUTURE PLANS

- A. OSC TO COORDINATE WITH ERCS FOR DISPOSAL OF REMAINING WASTE
STREAMS UPON RECEIPT OF ANALYTICAL.
- B. GAURD SERVICE TO REMAIN ON SITE UNTIL ALL WASTES HAVE BEEN
REMOVED FROM THE PREMISES.
- C. OSC TO UPDATE EPA-OPA AND EPA ENFORCEMENT ON SITE STATUS.

PHILIP C. YOUNIS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA.

100224

To: ERD/DEER (EPA5511)
To: T.MASSEY (EPA9374)
From: T.MASSEY (EPA9374) Delivered: Tue 29-Mar-88 11:06 EST Sys 163
(59)
Subject: polrep #45 belfield ave. site
Mail Id: IPM-163-880329-100040969

POLREP #45

BELFIELD AVENUE SITE

GERMANTOWN, PHILADELPHIA COUNTY, PA
CERCLA/SARA EMERGENCY REMOVAL

ATTENTION: ROBERT E. CARON AND TIM FIELDS

I. SITUATION (MARCH 28, 1988; 1700 HOURS)

- A. PERSONNEL ON SITE: EPA-1, TAT-2, ERCS-5
- B. WEATHER: SUNNY WITH TEMPS IN THE UPPER 50'S.
- C. ERCS ON SCENE THIS DATE TO PERFORM LEVEL B DRUM SAMPLING AND CHEMICAL INVENTORY.
- D. OSC UPDATES EPA/DPA (GERMANN) WITH INFORMATION CONCERNING SITE ACTIVITIES.
- E. OSC CONTACTS JOHN HADALSKI (CITY OF PHILA) TO INFORM HIM OF EPA'S PRESENCE ON SITE AND PRESENT SITE STATUS.
- F. SHEPPARD SECURITY REMAINED ON SCENE DURING NON ACTIVE PERIOD TO MAINTAIN 24 HOUR SITE SECURITY.
- G. COMMAND POST WHICH REMAINED ON SITE DURING NON ACTIVE PERIOD IS SEVERELY DAMAGED.

II. ACTIONS TAKEN

- A. ERCS SAMPLED APPROXIMATELY FORTY (40) DRUMS AND/OR BUCKETS FOR DISPOSAL ANALYSIS.
- B. TAT ON SCENE TO MONITOR SITE ACTIVITIES.
- C. OSC INFORMS ERCS THAT EPA WILL NOT BE RESPONSIBLE FOR DAMAGES ON COMMAND POST DURING NON ACTIVE PERIODS.

III. FUTURE PLANS

- A. ERCS TO CONTINUE SAMPLING OF CONTAINERS FOR DISPOSAL ANALYSIS.
- B. GUARD SERVICE TO REMAIN ON SITE UNTIL ALL WASTES HAVE BEEN REMOVED FROM THE PREMISES.

-
- C. ERCS TO PROVIDE NEW OFFICE TRAILER UPON START UP OF REMOVAL ACTIVITIES.

PHILIP C. YOUNIS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

100225

TO: ENV/WMH (EPA9374)
To: T. MASSEY (EPA9374)
From: T. MASSEY (EPA9374) Delivered: Tue 29-Mar-88 16:11 EST Sys 16:
(60)
Subject: BELFIELD AVENUE SITE - POLREP #46
Mail Id: IPM-163-880329-145770577

POLREP #46
BELFIELD AVENUE SITE
GERMANTOWN, PHILADELPHIA COUNTY, PA
CERCLA/SARA REMOVAL ACTION

ATTENTION: (ROBERT E. CARON AND TIM FIELDS)

I. SITUATION: (1830 HOURS 3/29/88)

- A. SITE ACTIVITIES WILL BE ON STAND-BY UNTIL ANALYTICAL RESULTS ARE RECEIVED AND EVALUATED FOR DISPOSAL.
- B. 24 HOUR SITE SECURITY BEING MAINTAINED BY SHEPPARD SECURITY.
- C. PERSONNEL ON SCENE: EPA-1, TAT-2, AND ERCS-5
- D. WEATHER: SUNNY WITH TEMPS IN UPPER 70'S.

II. ACTIONS TAKEN

- A. ERCS COMPLETES INVENTORY AND SAMPLING OF CONTAINERS ON SITE.
- B. ERCS SECURES STORAGE AREA CONTAINING HAZARDOUS MATERIALS.
- C. TAT ON SCENE MONITORING SITE ACTIVITIES.
- D. ERCS DELIVERS SAMPLES TO ANALYTIKEM FOR HAZARDOUS WASTE CHARACTERIZATION ANALYSIS. A BULKING SCHEME WILL BE DEvised FROM LAB RESULTS.
- E. OSC CONTACTED EPA ENFORCEMENT FOR BRIEFING ON SITE ACTIVITY.

III FUTURE PLANS

- A. OSC PLANS TO REDUCE SECURITY MANPOWER FOR COST SAVINGS TO THE PROJECT.
- B. OSC TO RECEIVE WRITTEN ANALYTICAL RESULTS IN FOUR (4) WEEKS.
- C. OSC, TAT, AND ERCS TO DEMOBE SITE UNTIL TRANSPORTATION AND DISPOSAL CAN BE ARRANGED.

PHILIP YOUNIS, OSC
U.S. EPA, REGION III
PHILADELPHIA, PA

100226

To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Tue 14-June-88 15:27 EDT Sys
163 (61)
Subject: polrep #47 belfield ave. site
Mail Id: 1PM-163-880614-139160092

BELFIELD AVE.
GERMANTOWN, PHILA. CO. PA
EMERGENCY REMOVAL

POLREP #47

ATTN: TIM FIELDS AND STEVE JARVELA

I. SITUATION (1100 HOURS; 6/13/88)

- A. DRUMS OF HAZARDOUS WASTE CONTAINING PCP CONTAMINATION REMAIN ON SITE AWAITING DISPOSAL.
- B. ACCORDING ERCS DISPOSAL COORDINATOR THERE ARE NO FACILITIES THAT WILL ACCEPT A PCP WASTE STREAM BECAUSE OF THE DIOXIN BY-PRODUCT PRODUCED AFTER INCINERATION.
- C. THE OSC IS CURRENTLY CONSIDERING AN ALTERNATIVE TECHNOLOGY TO TREAT THE WASTES ON SITE. A THERMAL DECHLORINATION PROCESS DEVELOPED BY THE GALSON RESEARCH COMPANY IN SYRACUSE, NY, IS BEING CONSIDERED TO REDUCE THE TOXICITY OF THE PCP CONTAMINATED DRUMS. THIS PROCESS WILL ONLY DOWNGRADE THE WASTE FROM ACUTELY HAZARDOUS TO HAZARDOUS AND THE WASTES MAY THEN BE DISPOSED OF IN RCRA PERMITTED HAZARDOUS WASTE INCINERATOR OR LANDFILL.
- D. BOB PETERSON OF GALSON RESEARCH CORP. ON SITE THIS DAY TO GATHER INFORMATION NEEDED TO PREPARE COST ESTIMATE FOR TREATMENT PROCESS.
- E. \$330,000 REMAIN IN CURRENT CEILING FOR PROJECT.

II. ACTIONS TAKEN

- A. OSC TASKED TAT TO RESEARCH DISPOSAL OF PCP WASTE STREAM.
- B. TAT MET ON SCENE WITH ERCS CHEMIST AND DISPOSAL COORDINATOR AND GALSON REPRESENTATIVE, TO DISCUSS TREATMENT PROCESS, PROJECT TIME FRAME, START UP DATE AND COST ESTIMATION. NO COST ESTIMATION COULD BE GIVEN AT THIS TIME.

III. FUTURE PLANS

- A. TAT TO CONTINUE RESEARCHING DISPOSAL ALTERNATIVES TO TRY AND LOCATE A FACILITY THAT MAY ACCEPT PCP WASTE, AVOIDING PRETREATMENT COSTS.
- B. PROJECT START UP DATE SCHEDULED FOR BEGINNING OF AUGUST DUE TO PRIOR COMMITMENTS OF HALSTON RESEARCH COMPANY.
- C. GALSON TO SET UP LABORATORY PROCESS SIMULATION FOR PRETREATMENT OF PCP WASTES.

PHILLIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100287

To: ERD/OERR (EPA5511)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Tue 16-Aug-89 15:42 EDT
Subject: BELFIELD AVENUE SITE POLREF 48
Mail Id: IFM-163-880816-141421151

BELFIELD AVENUE SITE

GERMANTOWN, PHILADELPHIA COUNTY, PA
EMERGENCY REMOVAL

POLREF #48

ATTN: TIM FIELDS AND STEVE JARVELA

I. SITUATION

- A. APPROX. 300 DRUMS AND OTHER CONTAINERS CONTAINING PCP CONTAMINATED LIQUIDS AND SLUDGES.
- B. \$230,000 REMAINS IN CURRENT CEILING FOR PROJECT.
- C. EPA AND TAT RESEARCH INTO INNOVATIVE TECHNOLOGY FOR PCP DISPOSAL HAS SHOWN THAT ON-SITE PRETREATMENT OF THE WASTES IS NECESSARY TO SECURE DISPOSAL APPROVAL.

II. ACTIONS TAKEN

- A. ERCS SUBCONTRACTOR GALSON RESEARCH HAS BEEN SELECTED TO PERFORM ON-SITE DECHLORINATION PROCESS TO BREAK DOWN PCP WASTE.
- B. TAT CONTACTED DAVID JONES OF THERMALCHEM INC. REGARDING DISPOSAL OF WASTES AFTER GALSON PROCESS HAS REMOVED PCP CONTAMINATION. THERMALCHEM WILL ACCEPT THIS WASTE PROVIDED THAT ANALYSIS PERFORMED AFTER TREATMENT SHOWS PCP AND DIOXIN LEVELS LESS THAN 2 PPB, OR NOT DETECTED. THERMALCHEM HAS ACCEPTED WASTES FROM THE GALSON PROCESS. WASTES MUST ALSO NOT BE CLASSED AS F LISTED WASTES.
- C. THE REMOVAL PROJECT WILL BE BROKEN DOWN INTO THE FOLLOWING FOUR PHASES:
 1. LAB SCALE DECHLORINATION BY GALSON RESEARCH.
FIXED COST: \$30,900
TIME FRAME: TO BE COMPLETE 3 WEEKS TO 1 MONTH FROM THIS DATE.
 2. MOBILIZATION OF TREATMENT EQUIPMENT AND SETUP
FIXED COST: \$64,136
TIME FRAME: CONCURRENT WITH PHASE 1, AUGUST 24 THROUGH SEPTEMBER 21.

100223

3. DECHLORINATION OPERATIONS
ESTIMATED COSTS: \$163,442 FINAL COST TO BE
DETERMINED FOLLOWING LAB SCALE TREATMENT
TIME FRAME: SEPT. 21 THROUGH OCT 31 (APPROXIMATE)
4. FINAL DISPOSAL OF ALL SITE WASTES
ESTIMATED COSTS: \$200,000
TIME FRAME: NOV 1 THROUGH DEC 31 (PENDING ANALYSIS
FOR DISPOSAL AND APPROVAL FROM THERMALCHEM)
THIS PHASE TO CONSIST OF FINAL ANALYSIS OF ALL
WASTES, TRANSPORTATION TO DISPOSAL FACILITY, AND
DISPOSAL COSTS.
- D. GALSON RESEARCH HAS RECEIVED PURCHASE ORDER FROM ERCS
CONTRACTOR, AND HAS BEGUN LAB SCALE TREATMENT TESTS.
- E. ADDITIONAL FUNDING REQUEST COMPLETED THIS DATE
REQUESTING ORIGINAL \$1,026,000 CEILING BE INCREASED BY
\$300,000 TO \$1326,000. ADDITIONAL FUNDS TO BE USED IN
FISCAL YEAR 1989 FOR DISPOSAL OPERATIONS. FUNDING
REQUEST SUBMITTED TO EPA CONCURRENCE CHAIN ON 8-17-88.
- F. ONE YEAR STATUTORY LIMIT EXEMPTION COMPLETED THIS DATE.
ONE YEAR EXEMPTION SUBMITTED TO EPA CONCURRENCE CHAIN
ON 8-17-88.

III. FUTURE PLANS

- A. ERCS CONTRACTOR TO REPLACE COMMAND POST AT NO COST TO
EPA DUE TO DAMAGE DONE BY SECURITY SERVICE. ALL
UTILITIES TO BE RECONNECTED BY ERCS AT NO COST TO EPA
AFTER NEW COMMAND POST IS INSTALLED. ADDITIONALLY, A
NEW SECURITY SERVICE WILL BE HIRED AFTER 8-24-88 TO
PROVIDE APPROPRIATE SECURITY FOR THE PROJECT.
- B. EPA AND TAT TO MONITOR ERCS ACTIVITIES DURING PHASE 2
DAILY UNTIL IT IS DETERMINED THAT SETUP IS AGREEABLE TO
THE EPA.

PHIL YOUNIS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

100229

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Tue 6-Sep-88 14:17 EDT
Subject: POLREP 49 FOR BELFIELD AVENUE SITE
Mail Id: IPM-163-880906-128550133

BELFIELD AVENUE SITE
GERMANTOWN, PHILADELPHIA CO., PA
EMERGENCY REMOVAL

ATTN: CHARLES KLEEMAN, STEVE JARVELA AND TIM FIELDS

POLREP #49

I. SITUATION: (1500 HOURS; 8/24/88)

- A. ADDITIONAL FUNDING REQUEST SUBMITTED 8/23/88, REQUESTING \$300,000 TO COMPLETE THE REMOVAL OPERATIONS AT THE SITE.
- B. CURRENTLY \$230,000 REMAIN IN THE PROECT CEILING WHICH WILL BE USED FOR THE TREATMENT OF THE FCP CONTAMINATED WASTES THAT REMAIN ON SITE. ADDITIONAL FUNDS WILL BE NEEDED FOR FINAL DISPOSAL.
- C. STILL NO ACTION TAKEN BY RP TO ADHERE TO THE CONSENT ORDER REQUIRING CLEANUP OF DEBRIS AND WASTES (OTHER THAN THOSE WASTES BEING ADDRESSED BY EPA) THAT REMAIN ON SITE.
- D. POTENTIAL BUYER ON SITE THIS DATE TO MEET WITH OWNER BOB VERNON TO DISCUSS CONVERSION OF THE BURNED OUT FACILITY INTO A SHOPPING MALL.

II. ACTIONS TAKEN

- A. TAT MET WITH OHM AND GALSON REPS ON SITE THIS DATE TO DISCUSS START UP DATES AND SET UP TIME TO BEGIN TREATMENT PROCESS.
- B. OSC SIBMITTED MEMO TO EPA ENFORCEMENT (STEUTEVILLE) DESCRIBING LACK OF INITIATIVE FROM RP TO BEGIN CLEANUP.

III. FUTURE PLANS

- A. OHM TO REINFORCE ROOFING STRUCTURE AND SHORE UP WALLS IN STAGING AREA BEFORE GALSON RESEARCH WILL SET UP FOR TREATMENT.
- B. OHM TO PROVIDE NEW COMMAND POST, ELECTRICAL HOOKUP AND NEW SECURITY SERVICE BEGINNING NEXT WEEK.
- C. OSC AWAITING APPROVAL OF ADDITIONAL FUNDING REQUEST.
- D. TAT TO MONITOR SITE ACTIVITIES AFTER INITIAL SETUP BEGINS.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100230

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Thu 8-Sep-88 16:31 EDT Sys
Subject: POLREP #50 FOR BELFIELD AVENUE SITE
Mail Id: IPM-163-880908-148711089

BELFIELD AVENUE SITE
GERMANTOWN, PHILADELPHIA CO., PA
EMERGENCY REMOVAL

ATTN: CHARLES KLEEMAN, STEVE JARVELA AND TIM FIELDS

POLREP #50

I. SITUATION: (1700 HOURS; 9/7/88)

- A. STILL NO ACTION TAKEN BY RP TO ADHERE TO THE CONSENT ORDER REQUIRING CLEANUP OF DEBRIS AND WASTES (OTHER THAN THOSE WASTES BEING ADDRESSED BY EPA) THAT REMAIN ON SITE.
- B. ERCS ELECTRICIANS ON SITE TO INSTALL ELECTRICAL POWER HOOKUP IN PREPARATION FOR GALSON RESEARCH ON SITE TREATMENT OF PCP CONTAMINATED WASTES.
- C. MR. WOLFE OF WISTER STATION MALL CORP. ON SITE THIS DATE TO INQUIRE ABOUT THE SCHEDULED PROJECT ACTIVITY. THE OSC INFORMED HIM OF ALL ANTICIPATED FUTURE PLANS TO BE PERFORMED BY EPA. MR. WOLFE PLANS TO DEVELOP THE BUILDING INTO A MALL AFTER THE CLEANUP IS COMPLETE.

II. ACTIONS TAKEN:

- A. ERCS ELECTRICIANS INSTALLED A 3-PHASE POWER HOOKUP NEAR THE ENTRANCE TO THE BUILDING IN PREPARATION FOR GALSON RESEARCH ON SITE TREATMENT. A HOUSING FOR THE ELECTRICAL METER HAD NOT BEEN LOCATED AS OF THIS DATE BUT WILL BE INSTALLED AS SOON AS POSSIBLE.
- B. ERCS ELECTRICIANS TOURED THE SITE WITH TAT AND OSC TO MAKE DEFINITE ARRANGEMENTS FOR PROJECT START-UP SCHEDULED FOR 9/12/88.
- C. ADDITIONAL FUNDING REQUEST APPROVED BY REGIONAL ADMINISTRATION ON 9/7/88.
- D. OSC YOUNIS DELIVERED A LETTER TO EPA ENFORCEMENT (STEUTEVILLE) TO INFORM HIM OF THE RP'S FAILURE TO COMPLY WITH THE CONSENT ORDER. OSC NOW AWAITS INFORMATION FROM ENFORCEMENT AS TO THE STATUS OF OTHER AREAS OF THE BUILDING. IF EPA NEEDS TO ASSESS AND REMOVE THE WASTES IN OTHER AREAS, ADDITIONAL FUNDING WILL BE NECESSARY.

III. FUTURE PLANS:

- A. ERCS CREW, PCT AND RM TO BE ON SITE MONDAY 9/12/88 TO SET UP COMMAND POST, LIGHTING, DIKE AREAS FOR PROCESSING AND DECONTAMINATION, SHORE UP ONE WALL AND CEILING AROUND THE PROCESSING AREA, AND LOCATE A WATER SOURCE IN PREPARATION FOR GALSON RESEARCH ON SITE TREATMENT OF PCP. ADDITIONALLY TWO RT'S WILL BE MOBED IN TO CLEAR DEBRIS FOR NEW OFFICE TRAILER.
- B. GALSON RESEARCH PROJECTED TO BEGIN SET-UP OF ON-SITE TREATMENT SYSTEM THE WEEK OF OCTOBER 19TH.
- C. ERCS TO LOCATE AND INSTALL A HOUSING UNIT FOR THE ELECTRIC METER AS SOON AS ONE CAN BE LOCATED.
- E. TAT TO MONITOR SITE ACTIVITIES AFTER INITIAL SETUP BEGINS.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100232

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: P.YOUNIS (EPA9347) Delivered: Wed 14-Sep-88 16:17 EDT S
Subject: BELFIELD AVENUE SITE POLREP 51
Mail Id: IPM-163-880914-146570789

POLREP 51

BELFIELD AVENUE SITE

CERCLA REMOVAL

PHILADELPHIA, PHILA DELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEPHEN JARVELA, AND TIM FIELDS

I. SITUATION: 1700 HOURS, MONDAY, SEPT 12, 1988

A. WEATHER: 75 DEG, SUNNY, SLIGHTLY HAZY

B. PERSONNEL ON SCENE: EPA-1, TAT-2, ERCS-5

C. ESTIMATED COSTS TO DATE: (COB 9/12/88)

AGENCY	CEILING	EST COST
EPA DIRECT	\$ 55K	\$ 10,384
TAT	100K	43,536
ERCS	1060K	442,432
EPA INDIRECT	111K	20,800
TOTALS	\$1326K	\$ 517,152

D. ERCS REMOVED TO PREPARE FOR TREATMENT PROCESS OF PCP-CONTAMINATED WASTES STARTING NEXT WEEK.

E. OSC ISSUES ULTIMATUM TO PROPERTY OWNER REGARDING WASTES REMAINING IN THE BUILDING.

II. ACTIONS TAKEN:

A. ERCS REMOVED TO PREPARE AREA FOR RESUMPTION OF SITE OPERATIONS. THICK BRUSH SURROUNDING COMMAND POST WAS CLEARED. ARRANGEMENTS WERE MADE TO UPGRADE SANITARY SERVICES. ERCS AND WATER CO. INVESTIGATED POSSIBLE WATER SOURCE WITHIN BUILDING TO SUPPLY WATER NEEDED FOR THE TREATMENT PROCESS. IF THE INTERNAL SOURCE IS INOPERABLE, A PERMIT WILL BE NEEDED TO TAP THE FIRE HYDRANT. ARRANGEMENTS WERE MADE FOR INSTALLATION OF ADDITIONAL PHONE LINES. AN APPLICATION TO PECO WAS COMPLETED REGARDING UPGRADING THE ELECTRICAL SERVICE; A 440V HOOKUP WILL BE NEEDED FOR THE TREATMENT PROCESS.

100233

B. ERCS BEGAN BIDDING FOR INSTALLATION OF ADDITIONAL FENCING: SIX-FOOT CHAINLINK WITH BARBED WIRE ACROSS THE REAR OF THE BUILDING AND BLOCKING WINDOWS AND DOORS. ARRANGEMENTS MADE FOR BIDDER TO BE ON SCENE TOMORROW 9/13 FOR INSPECTION.

C. ERCS BEGAN BIDDING FOR CONTRACTOR TO SHORE UP THE UNSTABLE WALL AND TECHNICAL OPINION REGARDING THE STABILITY OF THE ROOFING STRUCTURE. IF ROOFING IS UNSTABLE, BIDDING WILL FOLLOW. BIDDER TO BE ON SCENE TOMORROW FOR INSPECTION.

D. OSC CONTACTED THE FOLLOWING PERSONS/AGENCIES TO INFORM THEM OF THE UPCOMING TREATMENT OPERATIONS:

PADER SOLID WASTE.....ANGIE CORRAO
PHILA. INDUSTRIAL WASTE DEPT.....ANNA MARIE DAURIA
PHILA. CITY AIR MANAGEMENT GROUP....CHARLIE WILLIAMS
PHILA. FIRE DEPT.....CAPT McALERE

E. OSC CONTACTED EPA ENFORCEMENT STEUTEVILLE REGARDING PROPERTY OWNER ACTIONS TO ADDRESS WASTES REMAINING UNSECURED IN THE BACK SECTION OF THE BUILDING.

F. OSC TRIED TO REACH PROPERTY OWNER ROBERT VERNON SEVERAL TIMES BUT WAS UNSUCCESSFUL. OSC WOULD LIKE TO GO OVER OTHER AREAS OF THE BUILDING TO DETERMINE WHETHER COMPLIANCE ORDER HAS BEEN MET. OSC NEEDS TO DETERMINE WHETHER THESE WASTES POSE A THREAT. THE OSC SENT A LETTER VIA CERTIFIED MAIL TO ROBERT VERNON THIS DATE. THE OSC GAVE MR. VERNON UNTIL MON 9/19/88 TO REPLY WHETHER OR NOT HE HAS OR WILL COMPLY WITH EPA'S ORDER REGARDING THE WASTES. IF THE OSC DOES NOT HEAR FROM MR. VERNON, EPA WILL INCLUDE THESE ADDITIONAL WASTES IN THE SCOPE OF THE PROJECT, WHICH MAY MORE THAN DOUBLE THE DISPOSAL VOLUMES.

G. PHILA. HAZMAT GROUP, CAPT McALERE, ON SCENE THIS DATE FOR TOUR OF BUILDING.

H. A PROSPECTIVE PROPERTY BUYER WAS ON SCENE THIS DATE AND WAS ALSO UNABLE TO REACH MR. VERNON.

I. OSC ADDRESSED THE STANDING RAINWATER IN THE BUILDING. ARRANGEMENTS WERE MADE BY ERCS FOR A LABORATORY ANALYSIS OF THE WATER TO ENSURE THAT IT CONTAINS NO PRIORITY POLLUTANTS.

J. SECURITY DAY SERVICE WAS IMMEDIATELY TERMINATED. SHEPPARD SECURITY SERVICES WILL BE TERMINATED AS SOON AS ANAOTHER COMPANY IS HIRED. SHEPPARD TERMINATED DUE TO EXTENSIVE DAMAGE TO COMMAND POST BY NIGHT GUARDS.

100234

III. FUTURE PLANS:

A. ERCS TO CONTINUE COLLECTING BIDS ON WALL STABILIZATION AND FENCING. THESE TASKS ARE TO BE COMPLETED BY THE END OF THIS WEEK.

B. OSC AWAITS REPLY FROM ROBERT VERNON.

C. SAMPLING OF STANDING WATER TO BE PERFORMED TOMORROW 9/13/88. LOCAL LABORATORY TO PROVIDE 48-HOUR TURNAROUND. OSC AWAITS RESULTS BY C.O.B. THURSDAY.

D. OSC ANTICIPATES ADDITIONAL TAT SUPPORT NEXT WEEK.

E. DIKING WITHIN BUILDING TO BE ADDRESSED THIS WEEK.

F. UTILITIES UPGRADES EXPECTED COMPLETION THURSDAY 9/15/88.

G. NEW COMMAND POST TRAILER TO ARRIVE WED 9/14/88.

PHILIP C. YOUNIS, OSC
EPA REGION III
PHILA., PA

To: ERD/DERR (EPA3511)
To: J.LUFFY (EPA9314)
To: REGION03.TAT (EPA9322)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Tue 20-Sep-88 7:25 EDT
Subject: POLREP 52 BELFIELD AVE SITE
Mail Id: IPM-163-880920-066891065

POLREP 052
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (SEPTEMBER 13 AND 14, 1988)

- A. WEATHER: SUNNY, WARM, HIGH'S IN THE 70'S
- B. OSC YOUNIS OFF SITE BOTH DAYS DUE TO OTHER REGIONAL COMMITMENTS.
- C. ESTIMATED COSTS TO DATE: COB 9/14/88

	COST TO DATE	CEILING
EPA (DIRECT)	10,384	55K
TAT	44,036	100K
ERCS	444.5	1,060,000
EPA (INDIRECT)	20,800	111K
TOTAL	75,664	1,326,000

II. ACTIONS TAKEN
9/13/88

- A. ERCS RM TOOK TWO QUART SAMPLES OF WATER FROM THE FLOOR OF THE WASTE STORAGE AREA. THE SAMPLES WERE TAKEN TO QC LABS, INC. FOR 48 HOUR TURNAROUND.
- B. WILLIAM BERGMAIER OF SITECAST CONSTRUCTION CO. ON SCENE AT 1140 HOURS THIS DATE FOR A SITE TOUR. THE BUCKLED WALL BESIDE THE WASTE STORAGE AREA WILL HAVE TO BE TAKEN DOWN AND THE ROOF SUPPORTED BEFORE THE AREA IS FENCED IN.
- C. RP VERNON AND AL WOLFE ON SCENE TO SPEAK WITH THE OSC. MR. VERNON STATED THAT 10 FLAMMABLE DRUMS IN THE BUILDING HAVE BEEN CLEARED FOR REMOVAL TO A PERMITTED FACILITY BUT HAVE NOT BEEN TAKEN OFF SITE YET.
- D. MIKE SMITH OF ANCHOR FENCE ON SCENE FOR A SITE TOUR AND TO MEASURE AREAS THAT WILL BE FENCED.
- E. ELECTRICAL SERVICE APPLICATION DELIVERED TO PECO.
- F. ERCS RM WS IN CONTACT WITH BOB PETERSON OF GALSON RESEARCH TO VERIFY THE LOCATION OF A FIRE EXIT DOOR.

100236

PETERSON WANTS THE WATER ON THE FLOOR OF THE WASTE STORAGE AREA REMOVED AT THE LAST POSSIBLE MOMENT TO AVOID ANY REFILLING WHICH MAY OCCUR.

- G. DIKING FOR THE DRUM STAGING AREA AND THE REACTION PROCESSING AREA WILL BE DONE WITH 30ML HYPALON RUBBER SHEETS RAISED OVER A TIMBER PERIMETER AS SPECIFIED BY GALSON RESEARCH.

9/14/88

- A. SITECAST CONSTRUCTION CO. CAN TAKE CARE OF THE FIRE DOORS IN THE FENCE. AN ESTIMATE OF \$2580 WAS GIVEN FOR THE FIRE DOORS, TEARING DOWN THE RUCKLED WALL AND SUPPORTING THE ROOF.
- B. A REP. FROM ANCHOR FENCE WAS ON SCENE AT 1035 HOURS THIS DATE WITH A FOREMAN. A #9 CHAIN LINK FENCE WILL BE USED INSTEAD OF AWG #11 DUE TO LACK OF AVAILABILITY AND COST EFFECTIVENESS. AN ESTIMATE OF \$9800 WAS GIVEN.
- C. ERCS OBTAINED A PERMIT THIS DATE FOR USE OF THE FIRE HYDRANT.

III. FUTURE PLANS

- A. SITECAST CONSTRUCTION CO. TO BE ON SITE THURSDAY 9/15/88 TO BEGIN WORK.
- B. ANCHOR FENCE TO BE ON SITE FRIDAY 9/16/88 TO BEGIN WORK.
- C. NEW OFFICE TRAILER TO BE ON SITE THURSDAY 9/15/88 WITH NO ADDED COST TO THE PROJECT DUE TO DESTRUCTION BY THE SUBCONTRACTORS (SHEPPARD SECURITY).
- D. ELECTRIC SERVICE TO PROVIDE A METER AND SERVICE ASAP.
- E. OSC, TAT, EPA ENFORCEMENT AND RF VERNON TO MEET ON SITE MONDAY 9/19/88 TO MAKE A DECISION ON THE DRUMS IN THE LEFT SIDE OF THE BUILDING.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100237

To: ERD/OERR (EPA5511)
To: J. LUFFY (EPA9314)
To: REGION03.TAT (EPA9322)
To: ERD (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Tue 20-Sep-88 7:23 EDT
Subject: POLREP 53 BELFIELD AVE SITE
Mail Id: IFM-163-880920-066471245

POLREP #53

BELFIELD AVENUE SITE

PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

1. SITUATION: (1730 HOURS; 9/18/88)

- A. THE BELFIELD AVE. SITE IS CURRENTLY UNDERGOING SET-UP OPERATIONS TO BEGIN THE TREATMENT PHASE OF THE PCP CONTAMINATED WASTES THAT REMAIN ON SITE. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL.
- B. PECC REP (A.KENT) ON SITE 9/15. THE 440V ELECTRICAL HOOKUP NEEDED TO OPERATE GALSON'S EQUIPMENT WILL HAVE TO BE RUN UNDERGROUND, POSSIBLY CAUSING FURTHER DELAYS BEFORE SITE OPERATIONS CAN BEGIN.
- C. OSC YOUNIS UNABLE TO BE ON SITE DUE TO OTHER REGIONAL COMMITMENTS.
- D. ANALYTICAL RESULTS FROM THE STAGNATED WATER THAT HAD COLLECTED ON THE GROUND NEAR THE DRUMS, INDICATED NO SIGNIFICANT CONTAMINATION. OSC TO MAKE ARRANGEMENTS TO PUMP THE WATER TO NEAREST SANITARY SEWER.
- E. NEW COMMAND POST HAS NOT YET ARRIVED ON SITE AS OF THIS DATE NOR HAS THE FENCING CONTRACTOR BEEN ON SITE TO BEGIN SECURING THE SITE.
- F. ESTIMATED COSTS TO DATE: COB 9/16/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$ 8,297 *	55K
TAT	45,000	100K
ERCS	453,300	650K
EPA (INDIRECT)	24,228 *	111K
TOTAL	530,825	

TOTAL PROJECT CEILING \$1,326,000

* ADJUSTED COST AS OF 9/13/88 FROM FMS PROJECT STATUS REPORT

100238

II. ACTIONS TAKEN

- A. DAMAGED COMMAND POST REMOVED 9/15, (AT NO EXPENSE TO THE PROJECT) IN PREPERATION TO RECEIVE A NEW COMMAND POST. OLD COMMAND POST DAMAGED BY SHEPPARD SECURITY GUARD SERVICE. PHONE LINES AND ELECTRICAL HOOK-UP ARRANGEMENTS WERE MADE THIS DATE.
- B. SITE CAST CONSTRUCTION COMPANY ONSITE 9/15 TO REMOVE PARTIALLY COLLAPSED WALL THIS DATE. ALSO A BEAM WAS PLACED OVERHEAD TO SECURE THE PARTIALLY COLLAPSED ROOF OVER THE STAGING AREA.
- C. ERCS RM, PCT AND ELECTRICIAN ON SITE 9/16 AWAITING THE ARRIVAL OF THE NEW COMMAND POST. SITE PREP WORK WAS ALSO CONDUCTED THIS DATE.

III. FUTURE PLANS

- A. NEW OFFICE TRAILER TO BE ON SITE BY TUESDAY 9/20/88.
- B. PECD TO PROVIDE METERED ELECTRICAL SERVICE ASAP.
- C. OSC, TAT, EPA ENFORCEMENT AND RP VERNON TO MEET ON SITE MONDAY 9/19/88 TO MAKE A DECISION ON THE DRUMS IN THE LEFT SIDE OF THE BUILDING. THIS AREA HAS NOT BEEN ASSESSED TO DATE.
- D. CONTRACTOR TO BEGIN INSTALLATION OF FENCE 9/19/88 AS REQUIRED BY GALSON RESEARCH FOR SECURITY PURPOSES.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100239

1

To: ERD/DERR (EPA5511)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Thu Dec-08-88 9:08 EDT
Subject: POLREP 54 FOR BELFIELD
Mail Id: IFM-163-880922-062270399

POLREP #54

BELFIELD AVENUE SITE

PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: 1700 HOURS; 9/20/88

A. THE BELFIELD AVE. SITE IS CURRENTLY UNDERGOING SET-UP OPERATIONS TO BEGIN THE TREATMENT PHASE OF THE PCB CONTAMINATED WASTES THAT REMAIN ON SITE. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL.

B. WEATHER: OVERCAST, HIGH'S IN THE UPPER 70'S.

C. ESTIMATED COSTS TO DATE: COB 9/19/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$ 8.8K	55K
TAT	49.8K	100K
ERCS	460.4K	650K
EPA (INDIRECT)	26.5K	111K
TOTAL	545.1K	
TOTAL PROJECT CEILING \$1,325,000		

D. GENERATOR POWER IS CURRENTLY BEING ARRANGED TO USE DURING THE TREATMENT PROCESS INSTEAD OF WAITING FOR ELECTRICAL POWER FROM PECO. THE GENERATORS WILL BE LESS COSTLY, MORE TIME EFFECTIVE AND WAS APPROVED BY GALSON RESEARCH.

E. JOAN HENRY, FAS, AND 2 FINANCIAL REPS. ON SCENE 9/20/88 TO REVIEW COSTS FILES.

F. ERCS MAKING ARRANGEMENTS WITH SITECAST CONSTRUCTION CO. TO PUT UP A SWING FENCE TO SECURE THE GARAGE ENTRANCE.

100240

II. ACTIONS TAKEN

9/19/88

- H. RP VERNON, LEO, TATM ENFORCEMENT AND TAT WALKED THROUGH THE BUILDING AT 1100 HOURS THIS DATE. ENFORCEMENT (STEELEVILLE) INDICATED TO VERNON THAT HE MUST IDENTIFY AND DEAL WITH THE DRUMS THAT HE IS RESPONSIBLE FOR. ANY DRUMS WHICH HE (MR. VERNON) DOES NOT ASSUME RESPONSIBILITY FOR WILL BE SAMPLED AND ACCORDINGLY INCLUDED IN THE EPA CLEAN-UP OF THE BUILDING.
- B. ANCHOR FENCE ON SCENE TO BEGIN CONSTRUCTION OF THE SECURITY FENCE AROUND THE PROCESSING AREA.
- C. TATM SCOTT SPOKE WITH TATM FOX ABOUT SETTING UP A SPECIAL PROJECTS LAB FOR THE SAMPLE TO BE RECEIVED FROM MR. VERNON. UP TO 3 SAMPLES WILL BE ANALYZED FOR THE HAZARDOUS SUBSTANCES LIST ALONG WITH RCRA CHARACTERISTICS (CORROSIVITY, REACTIVITY, FLAMMABILITY, ETC.) MR. VERNON WAS INFORMED BY OSC YOUNIS THAT HE HAS UNTIL FRIDAY, SEPTEMBER 23, TO IDENTIFY AND REMOVE ALL DRUMS WHICH HE IS RESPONSIBLE FOR. OSC INSTRUCTED TAT TO BEGIN TAKING INVENTORY OF VERNON'S SIDE OF THE BUILDING AND PREPARE A SITE SAMPLING PLAN FOR THE DRUMS OF UNKNOWNNS (INCLUDING PAILS AND JARS) WHICH ARE LOCATED IN THE LEFT SIDE OF THE BUILDING. MR. VERNON HAS ALREADY HAD NEARLY 14 MONTHS TO BEGIN AND COMPLETE REMOVAL OF UNKNOWNNS AND KNOWNNS ON HIS SIDE OF THE BUILDING. VERY LITTLE PROGRESS HAS BEEN MADE TO DATE.

9/20/88

- A. ANCHOR FENCE ON SCENE TO CONTINUE INSTALLATION OF THE SECURITY FENCE.
- B. RP VERNON ON SCENE AT 1045 HOURS TO TAKE A COMPOSITE SAMPLE FROM THE DRUMS ON THE ROOF. HE EXPERIENCED DIFFICULTY IN OPENING THE BUNGS, ONLY FOUR DRUMS OUT OF APPROXIMATELY 40 WERE ABLE TO BE OPENED. MR. VERNON WILL RETURN WEDNESDAY 9/21/88 WITH A DRUM TRUCK TO STAGE AND OPEN THE DRUMS FOR SAMPLING.
- C. OSC YOUNIS AND TATM SCOTT MADE AN ENTRY INTO THE BASEMENT ON VERNON'S SIDE TO MAKE FLOOR SKETCHES AND INVENTORY POTENTIAL HAZARDS ON THIS FLOOR.
- D. COMMAND POST, PHONE LINES, ELECTRIC HOOK-UP, AND THE APPROVA FOR THE STANDING WATER IN THE DRUM STAGING AREA TO BE DISCHARGED INTO THE SANITARY SEWER WERE OBTAINED THIS DATE.

100241

III. FUTURE PLANS

- A. GENERATOR POWER TO BE SET UP ON SITE BY ERCS ASAP.
- B. RP VERNON TO BE ON SITE WEDNESDAY 9/21/88 TO STAGE AND SAMPLE THE DRUMS ON THE ROOF. IDENTIFICATION OF DRUMS (AND OTHER CONTAINERS) WILL ALSO BE CONDUCTED FOR THOSE ON BOTH THE FIRST AND SECOND FLOOR OF THE BUILDING.
- C. SITECAST CONSTRUCTION CO. TO BUILD A SWING FENCE TO SECURE THE GARAGE ENTRANCE UPON GALSON'S APPROVAL AND COMPLETE THE SECURITY FENCE.
- D. TAT TO PREPARE SITE SAMPLING PLAN TO CHARACTERIZE UNKNOWNNS WHICH ARE NOT HANDLED BY RP VERNON.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100242

To: ERD/OERR (EPA5511)
 To: REGION03.TAT (EPA9322)
 To: P.YOUNIS (EPA9347)
 To: ARC (EPA9374)
 From: REGION03.TAT (EPA9322) Delivered: Thu 22-Sep-88 12:36 ED
 Subject: POLREP 55 FOR BELFIELD
 Mail Id: IPM-163-880922-113440793

POLREP 55

BELFIELD AVENUE SITE

PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1730 HOURS; 9/21/88)

A. THE BELFIELD AVE. SITE IS CURRENTLY UNDERGOING SET-UP OPERATIONS TO BEGIN THE TREATMENT PHASE OF THE PCP CONTAMINATED WASTES THAT REMAIN ON SITE. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL.

B. WEATHER: OVERCAST, HIGH'S IN THE UPPER 70'S.

C. ESTIMATED COSTS TO DATE: COB 9/20/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$ 9.1 K	55K
TAT	50.6 K	100K
GRCS	468.3K	650K
EPA (INDIRECT)	25.6K	111K
TOTAL	554.5K	

TOTAL PROJECT CEILING \$1,326,000

D. GENERATOR POWER IS CURRENTLY BEING ARRANGED FOR USE DURING THE TREATMENT PROCESS INSTEAD OF WAITING FOR ELECTRICAL POWER FROM PECO. THE GENERATORS WILL BE LESS COSTLY, MORE TIME EFFECTIVE AND WERE APPROVED BY GALSON RESEARCH.

E. JIM ROEDER OF GALSON RESEARCH ON SCENE TO INSPECT SITE PREPARATIONS. HE WAS VERY SATISFIED WITH SITE PREPARATIONS TO DATE.

II. ACTIONS TAKEN

- A. ANCHOR FENCE ON SCENE TO COMPLETE CONSTRUCTION OF THE SECURITY FENCE AROUND THE PROCESSING AREA. ALSO, THEY MADE ARRANGEMENTS FOR CONSTRUCTING A SWING GATE WITH A PRIVACY LINER TO CONTROL ACCESS FROM THE GARAGE ENTRANCE.
- B. RF VERNON ON SCENE AT 1000 HOURS TO STAGE DRUMS ON ROOF AND TAKE A COMPOSITE SAMPLE OF EACH. MR. VERNON CONDUCTED SOME QUICK FIELD TESTS TO SEE IF SOME OF THE CONTENTS WERE FLAMMABLE AND COULD BE USED AS A FUEL. HE IS PREPARING TO PUMP CONTENTS OF THE DRUMS INTO A TANK TRUCK WITHIN THE NEXT TWO WEEKS. AFTER SPEAKING WITH VERNON, USC AND TAT CONCURRED THAT ALTHOUGH MR. VERNON HAS GOOD INTENTIONS, HE DOES NOT HAVE THE TIME OR RESOURCES TO EFFECT THE PROPER CLEANUP FOR THE WASTE MATERIALS IN THE LEFT SIDE OF THE BUILDING WHERE HE OPERATED HIS BUSINESS (VISUAL PACKAGING).
- C. JIM KOEDER OF GALSON CORP. ON SCENE AT 1215 HOURS THIS DATE FOR A SITE TOUR AND AN UPDATE ON PREPARATIONS. HE CLAIMED THAT IT WILL TAKE APPROXIMATELY TWO WEEKS FOR GALSON RESEARCH'S SETUP AND APPROXIMATELY ONE WEEK TO LOAD THE WASTE INTO THE PROCESS CHAMBER. THE NEUTRALIZING PROCESS WILL TAKE APPROXIMATELY TWO WEEKS RUNNING 24 HOURS A DAY/7 DAYS A WEEK.
- D. OSC YOUNIS UPDATED OPA THIS DATE. MEDIA INTEREST IS LOW AT THIS POINT.
- E. OSC YOUNIS SPOKE WITH POTENTIAL BUYER AL WOLFE THIS DATE CONCERNING SITE PROGRESS AND ESTIMATED PROJECT COMPLETION DATE.
- F. COMMAND POST OPERATIONS WERE MADE FULLY FUNCTIONAL THIS DATE AND ARRANGEMENTS WERE MADE BY ERCS FOR FUEL DELIVERY AND STORAGE TANK PLACEMENT INSIDE BUILDING. LARGE QUANTITIES OF FUEL WILL BE NEEDED DURING THE TREATMENT PHASE TO POWER THE TWO LARGE GENERATORS WHICH WILL BE FUNCTIONAL 24 HOURS A DAY/7 DAYS A WEEK.

III. FUTURE PLANS

- A. GENERATOR POWER TO BE SET UP ON SITE BY ERCS FOR NEXT WEEK.
- B. SITECAST CONSTRUCTION CO. TO BUILD A SWING FENCE WITH PRIVACY LINER TO SECURE THE GARAGE ENTRANCE UPON GALSON'S APPROVAL AND COMPLETE THE SECURITY FENCE.

100244

- C. ERCS CHEMIST AND SAMPLERS TO BE ON SITE MONDAY 9/26/88 TO SAMPLE DRUMS IN RP VERNON'S SIDE OF THE BUILDING. IF PCP IS FOUND IN THE SAMPLES, THEY WILL BE TREATED ON SITE BY GALSON ALONG WITH THE REST OF THE STAGED CONTAMINATED WASTE. RP VERNON WILL BE GIVEN THE OPPORTUNITY TO BULK THE DRUMS AND DISPOSE OF THEM PROPERLY. IF HE (VERNON) FAILS TO TRANSPORT AND DISPOSE OF ALL HAZARDOUS MATERIALS ON HIS SIDE OF THE BUILDING BY THE END OF THE MONTH (SEPT.), THE EPA WILL HAVE TO ALLOCATE ADDITIONAL FUNDING TO ANALYZE, BULK, STAGE, AND TRANSPORT/DISPOSE OF THESE WASTE MATERIALS.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100245

To: ERD/OERR (EPA5511)
To: REGIONAL TAT (EPA9322)
To: P. YOUNIS (EPA9347)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Fri 23-Sep-88 13:21 EDT Sys
Subject: POLREP 06 FOR BELFIELD AVE. SITE
Mail Id: IPN-163-880923-120240923

POLREP 056

BELFIELD AVENUE SITE

PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

1. SITUATION: (1730 HOURS; 9/22/88)

A. THE BELFIELD AVE. SITE IS CURRENTLY UNDERGOING SET-UP OPERATIONS TO BEGIN THE TREATMENT PHASE OF THE PCP CONTAMINATED WASTES THAT REMAIN ON SITE. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL.

B. WEATHER: OVERCAST, HIGH'S IN THE UPPER 70'S.

C. ESTIMATED COSTS TO DATE: COB 9/21/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$12.6K	55K
TAT	\$1.4K	100K
ERCS	469.3K	650K
EPA (INDIRECT)	\$2.6K	111K
TOTAL	\$655.9K	

TOTAL PROJECT CEILING \$1,326,000

D. GENERATOR POWER IS CURRENTLY BEING ARRANGED FOR USE DURING THE TREATMENT PROCESS INSTEAD OF WAITING FOR ELECTRICAL POWER FROM PECCO. THE GENERATORS WILL BE LESS COSTLY, MORE TIME EFFECTIVE AND WERE APPROVED BY GALSON RESEARCH.

E. ERCS RESPONSE MANAGER OFF SCENE THIS DATE TO MAKE ARRANGEMENTS FOR GENERATORS, DIESEL FUEL, AND FIRE HOSE TO BE BROUGHT ON SITE NEXT WEEK 9/26/88.

F. RF VERNON NOT ON SITE TODAY TO COMPLETE SAMPLING OF THE DRUMS ON THE ROOF AND IN THE OTHER AREAS OF BUILDING WHERE HE ONCE OPERATED "VISUAL PACKAGING COMPANY"

100248

II. ACTIONS TAKEN

- A. ANCHOR FENCE ON SCENE AT 1500 HOURS THIS DATE TO TAKE MEASUREMENTS FOR THE SWING DOOR. FABRICATION OF IT WILL BEGIN ON SATURDAY 9/27/88.
- B. ERCS RM ARRANGES AND OBTAINS 24 FITTINGS FOR WATER TAP-IN, LUMBER FOR BERM AND CONTAINMENT AREA, AND ALL FORMAL ARRANGEMENTS AND DETAILS FOR THE ELECTRICAL POWER WERE NEGOTIATED WITH GALSON RESEARCH CO.
- C. INVENTORY AND ARRANGEMENTS WERE MADE BY TAT AND ERCS FOR CONTAINERS ON VERNON'S SIDE OF BUILDING TO BE SAMPLED FOR COMPATABILITY SO THAT MATERIAL WASTE CONTAINERS CAN BE BULKED TO REDUCE THE NUMBER OF WASTE STREAMS AS WELL AS THE ASSOCIATED COST FOR DISPOSAL ANALYSIS OF EACH WASTE STREAM. OSC CONIS MADE SEVERAL ATTEMPTS TO CONTACT RE VERNON CONCERNING THE WASTE CONTAINERS ON HIS SIDE OF THE BUILDING BUT MR. VERNON WAS NOT REACHABLE. THEREFORE, THE OSC HAS DECIDED THAT ALL PLANS TO IDENTIFY AND APPROPRIATELY HANDLE WASTE CONTAINERS(ON VERNON'S SIDE OF PROPERTY) MUST PROCEED(WITHOUT FURTHER DELAYS FROM MR. VERNON) IN A TIMELY FASHION TO EFFECTIVELY COMPLETE SITE CLEAN UP. THE OSC STILL WISHED TO COOPERATE WITH RE VERNON, BUT WILL NOT TOLERATE ANY ADDITIONAL DELAYS.

III. FUTURE PLANS

- A. GENERATOR POWER TO BE SET UP ON SITE BY ERCS ON MONDAY 9/26/88 AND FUEL TANKS TO BE DELIVERED ON TUESDAY 9/27/88.
- B. ANCHOR FENCE TO BUILD A SWING FENCE WITH PRIVACY LINER TO SECURE THE GARAGE ENTRANCE UPON GALSON'S APPROVAL.
- C. TAT AND ERCS TO COMPLETE INVENTORY AND FINALIZE SAMPLING PLAN ON FRIDAY SEPT. 23. TAT WILL ASSIST ERCS CREW IN SAMPLING EFFORTS ON 09/29/88 TO EXPEDITE WORK.

100247

- D. ERCS CHEMIST AND SAMPLERS TO BE ON SITE MONDAY 9/24/88 TO SAMPLE DRUMS IN RF VERNON'S SIDE OF THE BUILDING. RF VERNON WILL BE GIVEN THE OPPORTUNITY TO BULK THE DRUMS AND DISPOSE OF THEM PROPERLY. IF HE (VERNON) FAILS TO TRANSPORT AND DISPOSE OF ALL HAZARDOUS MATERIALS ON HIS SIDE OF THE BUILDING BY THE END OF THE MONTH (SEPT.), THE EPA WILL HAVE TO ALLOCATE ADDITIONAL FUNDING TO ANALYZE, BULK, STAGE, AND TRANSPORT/DISPOSE OF THESE WASTE MATERIALS.
- E. ERCS WILL REMOVE NON-CONTAMINATED STANDING WATER IN STAGING AREA ON 9-23-88. APPROXIMATELY 1000 GALLONS HAS BEEN APPROVED BY THE SANITARY AUTHORITY FOR DISCHARGE INTO THE NEAREST SANITARY SEWER. OSC YOUNIS WILL SEND A COPY OF ANALYTICAL PERFORMS ON THIS WATER TO THE SANITARY AUTHORITY FOR THEIR RECORDS.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100248

To: EPA9374
From: EPA9374 Delivered: Thu 29-Sep-88 13:10 EDT Sy:
Subject: POLREP 57 FOR BELFIELD AVE. SITE
Mail Id: IPM-163-880929-118640392

From: RRC (EPA9374) Delivered: Tue 27-Sep-88 15:20 EDT Sy:
To: EPA9374
Subject: POLREP 57 FOR BELFIELD AVE. SITE
Mail Id: IPM-163-880927-138121104

POLREP #57
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1730 HOURS; 9/23&26/88)

- A. THE BELFIELD AVE. SITE IS CURRENTLY UNDERGOING SET-UP OPERATIONS TO BEGIN THE TREATMENT PHASE OF THE PCP CONTAMINATED WASTES THAT REMAIN ON SITE. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL.
- B. WEATHER FOR BOTH DAYS: OVERCAST, HIGH'S IN THE UPPER 70'S.
- C. ESTIMATED COSTS TO DATE: COB 9/26/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$13.2K	55K
TAT	53.8K	100K
ERCS	480.0K	650K
EPA (INDIRECT)	33.1K	111K
TOTAL	580.0K	
TOTAL PROJECT CEILING \$1,326,000		

- D. PERSONNEL ON SCENE:
9/23/88: EPA-1; TAT-2; ERCS-2
9/26/88: EPA-1; TAT-3; ERCS-9
- E. RP VERNON NOT ON SITE FRIDAY 9/23/88 TO COMPLETE SAMPLING OF THE DRUMS ON THE ROOF AND IN THE OTHER AREAS OF BUILDING WHERE HE ONCE OPERATED "VISUAL PACKAGING COMPANY".
- F. TWO ERCS SAMPLE TEAMS ON SCENE MONDAY 9/26/88 TO SAMPLE THE DRUMS IN THE BASEMENT, FIRST FLOOR, AND ROOF ON RP VERNON'S SIDE OF THE BUILDING SINCE HE COULD NOT FINISH THE JOB EVEN THOUGH HE WAS GIVEN ADEQUATE TIME BY THE OSC.

100249

II. ACTIONS TAKEN

9/23/88

- A. ERCS PUMPED THE STANDING WATER FROM THE FLOOR OF THE DRUM STAGING AREA INTO THE SANITARY SEWER LINE (PRIOR APPROVAL RECEIVED FROM THE SANITARY AUTHORITY).
- B. OSC CONTACTED RP VERNON ONCE AGAIN. DUE TO OTHER COMMITMENTS MR. VERNON WAS NOT ON SITE YESTERDAY, 9/22/88, OR TODAY. THE OSC INFORMED HIM OF UPCOMING SAMPLING PLANS AND AGAIN REQUESTED THAT MR. VERNON APPROPRIATELY HANDLE ALL MATERIALS AND CONTAINERS IN THE AREA WHERE HE OPERATED THE VISUAL PACKAGING CO. ALL MATERIALS WILL BE SAMPLED FOR COMPATIBILITY SO THAT MATERIAL WASTE CONTAINERS CAN BE BULKED TO REDUCE THE NUMBER OF WASTE STREAMS AS WELL AS THE ASSOCIATED COST FOR DISPOSAL ANALYSIS OF EACH WASTE STREAM.
- C. TAT COMPLETED FLOOR SKETCHES AND INVENTORY OF DRUMS TO BE SAMPLED ON VERNON'S SIDE OF THE BUILDING; FIRST FLOOR, BASEMENT AND ROOF OF THE VISUAL PACKAGING CO. WERE SURVEYED. TAT ESTIMATED THAT 150 TO 200 CONTAINERS OF UNKNOWN EXIST AND SHOULD BE SAMPLED.
- D. TWO GENERATORS WERE DELIVERED THIS DATE WHICH WILL BE USED DURING GALSON'S TREATMENT PROCESS. GENERATORS WILL BE MORE TIME EFFECTIVE AND LESS COSTLY THAN ELECTRIC HOOKUP BY PECO.
- E. THERE WAS AN INTRUDER IN THE BUILDING AT 1300 HOURS THIS DATE WHO ENTERED THROUGH A SIDE DOOR INTO THE DRUM STAGING AREA. THE ONLY THING APPARENTLY STOLEN WAS A 1.5KW GENERATOR (APPROX. \$400 VALUE). THE REPLACEMENT COST WILL BE REFLECT ON THE DAILY CHARGE FOR THIS DATE.
- F. ANCHOR FENCE WAS ON SCENE THIS DATE TO TAKE MEASUREMENTS FOR THE SWING DOOR FABRICATION. THE FENCE WILL BE INSTALLED AT THE END OF THIS WEEK.

9/26/88

- A. TWO ERCS SAMPLE TEAMS ON SCENE THIS DATE TO BEGIN SAMPLING OF THE BASEMENT, FIRST FLOOR AND ROOF ON RP VERNON'S SIDE OF THE BUILDING (VISUAL PACKAGING CO.). BASEMENT SAMPLING WAS COMPLETED AND 2/3 OF THE ROOF WAS SAMPLED THIS DATE. DRUMS ON THE ROOF OBTAINED READINGS OF 100% LEL ON THE EXPLOSIMETER DENOTING FLAMMABLE LIQUIDS, AND 200-300 PPM READINGS ON THE HNU. NO READINGS ABOVE BACKGROUND WERE OBTAINED ON EITHER INSTRUMENT ON DRUMS IN THE BASEMENT. THERE WERE NO READINGS ABOVE BACKGROUND OBTAINED ON THE RADIATION METER IN EITHER AREA. TAT ON SCENE TO ASSIST AND MONITOR ERCS SAMPLING CREWS.

- B. ERCS ELECTRICIANS ON SCENE THIS DATE TO PREPARE HOOKUPS FOR THE GENERATORS. IT WILL TAKE APPROXIMATELY 2 ADDITIONAL WORK DAYS TO COMPLETE HOOKUP OPERATIONS FOR GENERATOR POWER.
- C. F. C. HAAB CO., INC. ON SCENE THIS DATE TO COORDINATE THE INSTALLATION OF FUEL TANKS TO RUN THE GENERATORS. A FUEL DELIVERY SCHEDULE WAS ALSO DEFINITIZED THIS DATE. THE GENERATORS WILL BE FUNCTIONING 24 HOURS A DAY, FOR UP TO 10 CONSECUTIVE DAYS.
- D. OSC OBTAINED PERMIT FROM CITY OF PHILADELPHIA TO POSITION AND USE TWO LARGE GENERATORS ON THE SIDEWALK OUTSIDE THE PROCESSING AREA. THE GENERATOR WILL BE THERE FOR THE DURATION OF THE PROJECT (4-6 WEEKS). THE GENERATORS MUST BE PLACED OUTSIDE BECAUSE GALSON WILL BE OCCUPYING ALL AVAILABLE ROOM INSIDE THE BUILDING.
- E. BELL OF PA. WAS ON SCENE THIS DATE TO INSTALL A PHONE LINE IN THE LOADING DOCK AREA. THIS LINE WAS REQUIRED BY GALSON IN THEIR SPECIFICATIONS PLAN.
- F. THE OSC WAS IN CONTACT WITH RP VERNON THIS DATE IN AN ATTEMPT TO SECURE A COMMITMENT FROM HIM TO EMPTY THE EXISTING DRUMS ON THE ROOF BEFORE SAMPLING TOOK PLACE. VERNON STATED THAT HE WAS AWARE OF EPA'S SCHEDULE TO SAMPLE AND STAGE, BUT CANNOT COMMIT TO EMPTYING THE DRUMS AS OF YET. MR. VERNON STILL EXPRESSED AN INTEREST IN RECOVERING SOME OF THE CONTAINERS WITHIN THE NEXT 10 DAYS.
- G. GALSON RESEARCH REQUESTED A LIST OF 30 DRUMS TO BE SAMPLED IN THE DRUM STAGING AREA. APPROXIMATELY 18 DRUMS WERE SAMPLED BUT THE REST COULD NOT BE LOCATED THIS DATE. THEY WILL BE SAMPLED IF FOUND TOMORROW 9/27/88.

III. FUTURE PLANS

- A. ANCHOR FENCE TO BE ON SITE WEDNESDAY 9/28/88 TO BEGIN WORK ON THE SWING FENCE WITH PRIVACY LINER TO SECURE THE GARAGE ENTRANCE AND TO MEASURE THE DOORWAY THROUGH WHICH AN INTRUDER ENTERED INTO THE DRUM STAGING AREA.
- B. ERCS TO COMPLETE THE SAMPLING OF DRUMS ON RP VERNON'S SIDE OF THE BUILDING (VISUAL PACKAGING).
- C. ERCS TO REMOVE THE NON-CONTAMINATED STANDING WATER IN THE DRUM STAGING AREA WHICH ACCUMULATED FROM RAIN SINCE IT WAS LAST PUMPED OUT ON 9/23/88.

- D. GALSON RESEARCH TO BE ON SITE FRIDAY 9/30/88 TO BEGIN SETUP AND TO BE ON SITE FULL TIME.
- E. OSC TO CONTINUE WORKING WITH RP VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100252

To: ERD/OCRR (EPA5511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Fri 30-Sep-88 14:06 EDT Sys
Subject: POLREP 58 FOR BELFIELD AVE. SITE
Mail Id: IPM-163-880930-127040235

POLREP #58

BELFIELD AVENUE SITE

PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1700 HOURS; SEPTEMBER 28, 1988)

A. THE BELFIELD AVE. SITE IS NOW WRAPPING UP SET-UP OPERATIONS TO BEGIN THE TREATMENT PHASE OF THE PCP CONTAMINATED WASTES THAT REMAIN ON SITE. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL.

B. WEATHER BOTH DAYS: SUNNY. HIGH'S IN THE UPPER 70'S.

C. PERSONNEL ON SCENE:

9/27/88: EPA-1, TAT-3, ERCS-9

9/28/88: EPA-0, TAT-1, ERCS-5

D. ESTIMATED COSTS TO DATE: COB 9/28/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$13.5K	55K
TAT	55.2K	100K
ERCS	491.0K	650K
EPA (INDIRECT)	33.6K	111K
TOTAL	593.3K	916K

TOTAL PROJECT CEILING \$1,326,000

E. TWO ERCS SAMPLE TEAMS ON SCENE 9/27/88 TO SAMPLE THE DRUMS IN THE BASEMENT, FIRST FLOOR, AND ROOF ON RP VERNON'S SIDE OF THE BUILDING SINCE HE COULD NOT FINISH THE JOB EVEN THOUGH HE WAS GIVEN ADEQUATE TIME BY THE OSC.

II. ACTIONS TAKEN

9/27/88

- A. TWO ERCS SAMPLE TEAMS ON SCENE THIS DATE TO FINISH SAMPLING OF THE FIRST FLOOR AND ROOF ON RP VERNON'S SIDE OF THE BUILDING (VISUAL PACKAGING CO.). DRUMS ON THE ROOF AND THE FIRST FLOOR OBTAINED READINGS OF 100% LEL ON THE EXPLOSIMETER DENOTING FLAMMABLE LIQUIDS, AND 200-300 PPM READINGS ON THE HNU. THERE WERE NO READINGS ABOVE BACKGROUND OBTAINED ON THE RADIATION METER IN EITHER AREA. TAT WAS ON SCENE TO ASSIST AND MONITOR ERCS SAMPLING CREWS. THE SAMPLES WILL BE ANALYZED FOR COMPATIBILITIES IN ORDER TO BE BULKED FOR DISPOSAL.
- B. ERCS ELECTRICIANS ON SCENE THIS DATE TO PREPARE HOOKUPS FOR THE GENERATORS. IT WILL TAKE APPROXIMATELY 2 ADDITIONAL WORK DAYS TO COMPLETE HOOKUP OPERATIONS FOR GENERATOR POWER.
- C. GALSON RESEARCH REPS. ON SCENE TO DELIVER EQUIPMENT AND PICK UP REQUESTED SAMPLES TAKEN FROM STAGED DRUMS. THREE OF THE MISSING DRUMS WERE LOCATED AND SAMPLED THIS DATE. AFTER SEARCHING THE BUILDING FOR THE REMAINING 9 DRUMS TAT AND ERCS WERE STILL UNABLE TO LOCATE THEM. THE CONTAINERS WERE APPARENTLY ABSCONDED BETWEEN OCTOBER 1987, WHEN THE INITIAL INVENTORY WAS PERFORMED, AND THIS DATE.
- D. OSC YOUNIS WAS IN CONTACT WITH EPA ENFORCEMENT STEUTEVILLE THIS DATE TO INFORM HIM THAT RP BOB VERNON HAS NOT TAKEN ANY ACTION TO REMOVE CONTAINERS FROM THE VISUAL PACKAGING CO. BUILDING TO DATE. THE OSC CONTINUES TO NEGOTIATE WITH RP VERNON BUT WILL NOT DELAY SCHEDULED REMOVAL OPERATIONS. STEUTEVILLE TO BE IN CONTACT WITH VERNON TO ENCOURAGE COOPERATION.

9/28/88

- A. ERCS ELECTRICIANS ON SCENE THIS DATE TO FINISH POWER HOOKUPS FOR THE TWO GENERATORS. ONE ADDITIONAL GENERATOR (TOTAL OF THREE) MAY NOW BE NECESSARY BECAUSE GALSON HAS REQUESTED A HIGHER VOLTAGE REQUIREMENT.
- B. OSC TASKED TAT TO SET UP A LAB THROUGH SPECIAL PROJECTS MONIES FOR PCB SAMPLES. THERE ARE 7 TRANSFORMERS ON THE VISUAL PACKAGING CO. SIDE OF THE BUILDING WHICH WILL BE SAMPLED FOR PCB'S. STANDARD TURN-AROUND TIME WAS REQUESTED BY THE OSC.
- C. ANCHOR FENCE REP. ON SCENE TO MEASURE THE DOORWAY INTO THE DRUM STAGING AREA THROUGH WHICH AN INTRUDER ENTERED.

100254

- D. BELL TELEPHONE CO. ON SCENE TO HOOK UP SERVICE IN THE LOADING DOCK AREA OF THE BUILDING PER GALSON'S SPECS.
- E. RP VERNON ON SCENE TO DELIVER A COMPOSITE FUEL SAMPLE WHICH HE TOOK ON SUNDAY 9/25/88. IT WAS TAKEN FROM 41 DRUMS; 8 ON THE FIRST FLOOR AND 33 ON THE ROOF. MR. VERNON SPOKE WITH OSC YOUNIS AND STILL INDICATED THAT HE HAS EVERY INTENTION OF REMOVING THE FUELS AND A FEW PROSPECT DRUMS WITHIN THE NEXT 7 TO 10 DAYS.
- F. THREE REPS. FROM PHILA. FIRE MARSHALL'S OFFICE ON SCENE AT 1400 HOURS TO CHECK OPERATIONS AND PROGRESS. A SITE TOUR WAS CONDUCTED AND THEY WERE INFORMED OF ALL FUTURE PLANS.
- G. OSC SPOKE WITH ERCS PROGRAM MANAGEMENT AND AGREED THAT ONE PCT WOULD ADEQUATELY PROVIDE SUB-CONTRACTOR MONITORING AND SUPERVISION DURING THE SET-UP PHASE OF ON-SITE TREATMENT. THIS WILL RESULT IN A SIGNIFICANT COST SAVINGS TO THE PROJECT.

III. FUTURE PLANS

- A. ANCHOR FENCE TO BE ON SITE FRIDAY 9/30/88 TO BEGIN WORK ON THE SWING FENCE WITH PRIVACY LINER TO SECURE THE GARAGE ENTRANCE AND FENCE IN THE DOORWAY THROUGH WHICH AN INTRUDER ENTERED INTO THE DRUM STAGING AREA.
- B. ERCS TO REMOVE THE NON-CONTAMINATED STANDING WATER IN THE DRUM STAGING AREA WHICH ACCUMULATED FROM RAIN SINCE IT WAS LAST PUMPED OUT ON 9/23/88. THIS OPERATION WILL BE REPEATED THROUGHOUT THE PROJECT AS NEEDED.
- C. GALSON RESEARCH TO BE ON SITE FRIDAY 9/30/88 TO BEGIN SETUP WHICH WILL CONTINUE 7 DAYS A WEEK/12-14 HOURS A DAY FOR THE NEXT TWO AND A HALF WEEKS.
- D. OSC TO CONTINUE WORKING WITH RP VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.
- E. ERCS TO HOOK-UP ADDITIONAL (THIRD) GENERATOR ASAP PER GALSON'S REQUEST THROUGH OSC YOUNIS.
- F. ERCS TO BUILD BERMS FOR GALSON'S PROCESSING AREA.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Mon 3-Oct-88 10:04 EDT Sys
Subject: POLREP 59 FOR BELFIELD AVE. SITE
Mail Id: IPM-163-881003-090670935

POLREP #59

BELFIELD AVENUE SITE

PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; SEPTEMBER 29, 1988)

- A. THE BELFIELD AVE. SITE IS NOW WRAPPING UP SET-UP OPERATIONS TO BEGIN THE TREATMENT PHASE OF THE PCP CONTAMINATED WASTES THAT REMAIN ON SITE. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL.
- B. WEATHER: OVERCAST, HIGH'S IN THE 60'S.
- C. PERSONNEL ON SCENE: EPA-0, TAT-1, ERCS-3
- D. ESTIMATED COSTS TO DATE: COB 9/28/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$13.5K	55K
TAT	55.2K	100K
ERCS	491.0K	650K
EPA (INDIRECT)	33.6K	111K
TOTAL	593.3K	916K
TOTAL PROJECT CEILING \$1,326,000		

- E. OSC MAINTAINING CONTACT WITH RP VERNON AND PERSPECTIVE BUYER MR. WOLFE TO KEEP THEM UPDATED ON SITE ACTIVITIES AND SCHEDULED WORK IN REQUESTING THEIR CONTINUED COOPERATION.
- F. OSC OFF SITE THIS DATE TO ATTEND THE MONTHLY PROGRAM MEETING AT THE REGIONAL OFFICE.

II. ACTIONS TAKEN

- A. TAT SET UP A LAB THROUGH SPECIAL PROJECTS MONIES FOR PCB SAMPLES. THERE ARE 8 TRANSFORMERS ON THE VISUAL PACKAGING CO. SIDE OF THE BUILDING WHICH WILL BE SAMPLED FOR PCB'S. A DIKED AREA WHICH CONTAINS SPILLAGE FROM THE TRANSFORMERS WILL ALSO SAMPLED. STANDARD TURN-AROUND TIME WAS REQUESTED BY THE OSC (ONE WEEK).

- B. ERCS PUMPED OUT THE RAIN WATER WHICH ACCUMULATED ON THE DRUM STAGING AREA FLOOR. THIS WILL BE REPEATED THROUGHOUT THE PROJECT AS NEEDED.
- C. F. C. HAAB ON SCENE THIS DATE TO DELIVER FUEL TANKS FOR DIESEL FUEL FOR THE GENERATORS.
- D. SAMPLES TAKEN ON THE VISUAL PACKAGING SIDE OF THE BUILDING WERE DELIVERED TO QC LAB THIS DATE. A TWO WEEK TURNAROUND TIME WAS REQUESTED BY THE OSC.
- E. AN ADDITIONAL (THIRD) GENERATOR WAS DELIVERED TO THE SITE THIS DATE FOR ADDITIONAL POWER AS REQUESTED BY GALSON RESEARCH.

III. FUTURE PLANS

- A. ANCHOR FENCE TO BE ON SITE SATURDAY 10/1/88 TO BEGIN WORK ON THE SWING FENCE WITH PRIVACY LINER TO SECURE THE GARAGE ENTRANCE AND FENCE IN THE DOORWAY THROUGH WHICH AN INTRUDER ENTERED INTO THE DRUM STAGING AREA.
- B. GALSON RESEARCH TO BE ON SITE FRIDAY 9/30/88 TO BEGIN SETUP WHICH WILL CONTINUE 7 DAYS A WEEK/12-14 HOURS A DAY FOR THE NEXT TWO AND A HALF WEEKS.
- C. OSC TO CONTINUE WORKING WITH RP VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON. VERNON STILL PLANS ON FINDING A RECOVERY FACILITY FOR THE (APPROX. 50-60) DRUMS OF FUEL ON THE ROOF OF THE BUILDING. ADDITIONALLY, HE IS ALSO LOOKING INTO THE POSSIBILITY OF REUSING A FEW OF THE DRUMS (ON HIS SIDE OF THE BUILDING) WHICH CONTAIN SILICA AND AMMONIUM OLEATE.
- D. ERCS ELECTRICIANS TO BE ON SITE 10/3&4/88 TO HOOK-UP ADDITIONAL (THIRD) GENERATOR PER GALSON'S REQUEST THROUGH OSC YOUNIS.
- E. ERCS TO BUILD BERMS NEXT WEEK FOR GALSON'S PROCESSING AREA.
- F. ANALYTICAL RESULTS TO BE RECEIVED FOR SAMPLES TAKEN ON VISUAL PACKAGING SIDE OF THE BUILDING AND FOR TRANSFORMER (PCB) SAMPLES.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Mon 3-Oct-88 10:55 EDT Sys
Subject: POLREP 60 FOR BELFIELD AVE. SITE
Mail Id: IFM-163-881003-098250651

POLREP #60
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; SEPTEMBER 30, 1988)

- A. THE BELFIELD AVE. SITE IS NOW WRAPPING UP SET-UP OPERATIONS TO BEGIN THE TREATMENT PHASE OF THE PCP CONTAMINATED WASTES THAT REMAIN ON SITE. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL.
- B. WEATHER: SUNNY, HIGH'S IN THE 70'S.
- C. PERSONNEL ON SCENE: EPA-1, TAT-1, ERCS-3
- D. ESTIMATED COSTS TO DATE: COB 9/29/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$13.5K	55K
TAT	55.5K	100K
ERCS	490.9K	650K
EPA (INDIRECT)	34.1K	111K
TOTAL	594.0K	916K
TOTAL PROJECT CEILING \$1,326,000		

- E. OSC MAINTAINING CONTACT WITH RP VERNON AND MR. WOLFE.

II. ACTIONS TAKEN

- A. TAT SAMPLED THE TRANSFORMERS IN THE VISUAL PACKAGING SIDE OF THE BUILDING AND THEY WERE TAKEN TO WASTEX LABS FOR PCB ANALYSIS. EIGHT SAMPLES WERE TAKEN: 5 TRANSFORMERS ON THE ROOF ALONG WITH THE WATER IN THE DIKED AREA WHERE THEY ARE LOCATED AND 2 TRANSFORMERS IN THE BASEMENT. STANDARD TURNAROUND TIME WAS REQUESTED BY THE OSC.
- B. F. C. HAAB ON SCENE THIS DATE TO DELIVER DIESEL FUEL FOR THE GENERATORS.

- C. ARRANGEMENTS WERE MADE THIS DATE BY THE OSC TO INCREASE SITE SECURITY DUE TO FREQUENT BREAK-INS AT NIGHT. TWO PORTABLE FANS WERE STOLEN OVERNIGHT FROM THE EQUIPMENT STAGING AREA INSIDE THE BUILDING. A GUARD DOG WAS DELIVERED TO SITE AT 1700 HOURS TO BE POSTED IN THE GARAGE DOOR ENTRANCE. ALSO, SECURITY CHECKS WILL BE MADE AND LOGGED IN EVERY HALF HOUR AS OPPOSED TO EVERY HOUR.
- D. GALSON RESEARCH ON SCENE THIS DATE TO BEGIN THEIR SET-UP OF THE ON SITE TREATMENT PROCESS. THEY WILL NOW BE ON SITE FULL TIME FOR THE NEXT 6 TO 8 WEEKS.

III. FUTURE PLANS

- A. ANCHOR FENCE TO BE ON SITE SATURDAY 10/1/88 TO BEGIN WORK ON THE SWING FENCE WITH PRIVACY LINER TO SECURE THE GARAGE ENTRANCE AND FENCE IN THE DOORWAY THROUGH WHICH AN INTRUDER ENTERED INTO THE DRUM STAGING AREA.
- B. OSC TO CONTINUE WORKING WITH RP VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.
- C. ERCS ELECTRICIANS TO BE ON SITE 10/4&5/88 TO HOOK-UP ADDITIONAL (THIRD) GENERATOR PER GALSON'S REQUEST THROUGH OSC YOUNIS.
- D. ERCS TO BUILD BERMS FOR GALSON'S PROCESSING AREA.
- E. ANALYTICAL RESULTS TO BE RECEIVED FOR SAMPLES TAKEN ON VISUAL PACKAGING SIDE OF THE BUILDING AND FOR TRANSFORMER (PCB) SAMPLES.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100259

To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Mon 24-Oct-88 13:06 EDT Sy
Subject: POLREF 81 FOR BELFIELD AVE.
Mail Id: IPN-163-881024-118031267

POLREF 81

BELFIELD AVENUE SITE

PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; OCTOBER 3, 1988)

- A. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL. THEY ARE ON SITE ASSEMBLING THEIR ON-SITE TREATMENT PROCESS WHICH WILL TAKE APPROX. TWO WEEKS WORKING 7 DAYS A WEEK.
- B. WEATHER: CLOUDY, DRIZZLE, HIGH'S IN THE 50'S.
- C. PERSONNEL ON SCENE: EPA-1, TAT-1, ERCS-2, GALSON-2
- D. ESTIMATED COSTS TO DATE: COB 10/3/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$14.0K	55K
TAT	56.2K	100K
ERCS	554.0K	650K
EPA (INDIRECT)	34.5K	111K
TOTAL	658.7K	916K
TOTAL PROJECT CEILING \$1,326,000		

- E. OSC MAINTAINING CONTACT WITH RP VERNON AND MR. WOLFE (PERSPECTIVE BUYER OF THE BUILDING).

II. ACTIONS TAKEN

- A. GALSON RESEARCH CONTINUES TO SET UP THEIR ON SITE TREATMENT PROCESS. THEY WILL BE ON SITE FULL TIME FOR THE NEXT 6 TO 8 WEEKS.
- B. ANCHOR FENCE WAS ON SCENE SATURDAY 10/1/88 BUT THEY DID NOT ASSEMBLE ANY FENCES BECAUSE OF OTHER PRIORITIES. THEY ARE NOW BEING GIVEN A DEADLINE OF WEDNESDAY, 10/5/8, TO COMPLETE ALL BIDDING WORK.
- C. OSC SPOKE WITH RP VERNON THIS DATE. VERNON STATED THAT DELAWARE CONTAINER WILL TAKE ABOUT 60 DRUMS FROM (HIS SIDE OF THE BUILDING) VISUAL PACKAGING CO. IN APPROX. A MONTH FROM NOW. THE OSC EXPLAINED TO HIM THAT A LETTER OF INTENT IS REQUIRED FROM DELAWARE CONTAINER BEFORE THE DRUMS CAN BE RELEASED.

100260

- D. ERCS ELECTRICIAN ON SCENE TO BEGIN HOOK UP OF THE THIRD GENERATOR FOR GALSON'S TREATMENT PROCESS.
- E. GALSON INQUIRED IF THERE WERE ANY UTILITY LINES BURIED UNDER THE EXISTING DRIVE RAMP BECAUSE THEY MAY HAVE TO DIG DOWN FOUR FEET IN ORDER TO HAVE PROPER CLEARANCE FOR THE REACTION VESSEL. OSC SPOKE WITH MR. VERNON WHO STATED THAT THERE WERE NO LINES RUNNING UNDERNEATH THIS AREA. MR. VERNON ALSO INDICATED THAT EPA MAY BE RESPONSIBLE FOR ANY STRUCTURAL CHARGES MADE TO HIS BUILDING. OSC INFORMED MR. VERNON THAT ANY REQUESTED REPAIR WORK MUST BE ARRANGED THROUGH THE EPA OFFICE OF REGIONAL COUNCIL.
- F. OSC SPOKE WITH FAS HENRY CONCERNING THE ERCS CEILING. WE HAVE NOW EXCEEDED 85% OF THE CEILING. OSC YOUNIS PUT IN A PR INCREASE OF \$150,000, WHICH SHOULD BE APPROVED BY WEDNESDAY 10/5/88. THIS ACTION WILL RAISE THE CURRENT ERCS CEILING FROM 450K TO 600K.
- G. ERCS PCT ON SITE TO MONITOR SUBCONTRACTOR, MAKE DAILY REPORT AND ANY ARRANGEMENTS THAT NEED TO BE TAKEN CARE OF.

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.
- B. ERCS TO BUILD BERMS NEXT WEEK FOR GALSON'S PROCESSING AREA.
- C. ANALYTICAL RESULTS TO BE RECEIVED FOR SAMPLES TAKEN ON VISUAL PACKAGING SIDE OF THE BUILDING AND FOR TRANSFORMER (PCB) SAMPLES.
- D. GALSON TO CONTINUE WITH ON SITE TREATMENT SET-UP.
- E. ERCS CEILING INCREASE OF \$150,000 TO BE RECEIVED ON WEDNESDAY 10/5/88.
- F. ANCHOR FENCE TO BE ON SCENE TUESDAY 10/4/88 TO BEGIN WORK ON THE SWING FENCE DOOR FOR THE GARAGE ENTRANCE.
- G. ERCS TO BUILD A RAMP ON 10/4/88 TO PROTECT A FIREHOSE WHICH WILL RUN INTO THE PROCESSING AREA OF THE BUILDING. THIS WILL PROVIDE GALSON WITH THE NECESSARY WATER SUPPLY REQUIRED FOR THEIR ON-SITE TREATMENT PROCESS.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100261

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Wed 5-Oct-88 11:23 EDT Sys 16:
Subject: POLREP 62 FOR BELFIELD AVE. SITE
Mail Id: IFM-163-881005-102521016

POLREP #62
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; OCTOBER 4, 1988)

- A. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL. THEY ARE ON SITE ASSEMBLING THEIR ON-SITE TREATMENT PROCESS WHICH WILL TAKE APPROX. TWO WEEKS WORKING 7 DAYS A WEEK.
- B. WEATHER: CLOUDY, COOL, HIGH'S IN THE 60'S.
- C. PERSONNEL ON SCENE: EPA-1, TAT-1, ERCS-2, GALSON-2
- D. ESTIMATED COSTS TO DATE: COB 10/4/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$14.2K	55K
TAT	56.5K	100K
ERCS	560.7K	650K
EPA (INDIRECT)	34.8K	111K
TOTAL	666.2K	916K
TOTAL PROJECT CEILING \$1,326,000		

- E. OSC MAINTAINING CONTACT WITH RP VERNON AND MR. WOLFE (PERSPECTIVE BUYER OF THE BUILDING).

II. ACTIONS TAKEN

- A. GALSON RESEARCH CONTINUES TO SET UP THEIR ON SITE TREATMENT PROCESS. THEY WILL BE ON SITE FULL TIME FOR THE NEXT 6 TO 8 WEEKS.
- B. ANCHOR FENCE WAS ON SCENE THIS DATE TO BEGIN BUILDING A FENCE AROUND THE GENERATORS LOCATED ON THE SIDEWALK AND A SWING FENCE DOOR AT THE ENTRANCE OF THE GARAGE.

100262

- C. ERCS PCT ON SITE TO MONITOR SUBCONTRACTOR. MAKE DAILY REPORT AND ANY ARRANGEMENTS THAT NEED TO BE TAKEN CARE OF.
- D. ERCS CONSTRUCTED A WOODEN RAMP OVER THE SECTION OF FIREHOSE WHICH LIES IN FRONT OF A HEAVY TRAFFICED PARKING LOT (NOT IN THE PROCESSING AREA OF THE BUILDING AS IN POLREF #61). THE RAMP DID NOT HOLD UP AND WILL HAVE TO BE REPLACED BY A STEEL RAMP OR THE HOSE CAN BE BURIED IN THE SIDEWALK FOR THE DURATION OF THE PROJECT. THIS HOSE SUPPLIES GALSON WITH THE NEEDED WATER SUPPLY FOR THEIR REACTION PROCESS.
- E. GALSON RECEIVED A SHIPMENT OF 18 DRUMS OF POTASSIUM HYDROXIDE TO ELEVATE THE PH OF THEIR REAGENT MIXTURE TO 14 PLUS. ADDITIONAL CHEMICAL REAGENTS (POLYETHYLENE GLYCOL AND DIMETHYL SULFOXIDE) WILL ALSO BE SHIPPED TO THE SITE LATER THIS WEEK. THE REAGENT MIXTURE WILL BE USED TO DECHLORINATE THE CONTAMINATED SOILS AND SLUDGES, WHICH ARE THEN HEATED (300-1500) AND AGITATED UNTIL THE REACTION IS COMPLETE. THE PROCESS WILL BE A TOTALLY CLOSED SYSTEM. THE TREATED WASTE IS STILL CLASSIFIED AS A RCRA WASTE.
- F. GALSON RE-STAGED ALL WASTE CONTAINERS TO ONE CENTRALIZED AREA IN THE DRUM STAGING ROOM TO ALLOW FOR THE SPACE NECESSARY TO SET UP THEIR OPERATION. TAT ON SCENE TO MONITOR AND TAKE PHOTOS.
- G. F.C. HAAK CO., INC. ON SITE THIS DATE TO MEET WITH ERCS AND FINALIZE FUEL DELIVERY ARRANGEMENTS FOR THE GENERATORS.
- H. OSC ATTEMPTED TO CONTACT RP VERNON THIS DATE BUT WAS UNSUCCESSFUL.

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.
- B. ERCS TO BUILD BERMS NEXT WEEK FOR GALSON'S PROCESSING AREA.
- C. ANALYTICAL RESULTS TO BE RECEIVED FOR SAMPLES TAKEN ON VISUAL PACKAGING SIDE OF THE BUILDING AND FOR TRANSFORMER (PCB) SAMPLES. ALL ANALYTICAL WILL BE AVAILABLE BY 10/14/88.
- D. GALSON TO CONTINUE WITH ON SITE TREATMENT SET-UP.

100263

- E. ERCS CEILING INCREASE OF \$150,000 TO BE RECEIVED ON WEDNESDAY 10/6/88.
- F. ANCHOR FENCE TO FINISH WORK ON THE SWING FENCE DOOR FOR THE GARAGE ENTRANCE AND THE FENCE AROUND THE GENERATORS.
- G. ERCS TO RECONSTRUCT THE RAMP WHICH WILL PROTECT THE FIREHOSE LYING IN FRONT OF A HEAVILY TRAFFICED PARKING LOT.
- H. ERCS ELECTRICIAN TO BE ON SITE BY 10/6/88 TO COMPLETE ELECTRICAL HOOK UP FOR THE THIRD GENERATOR. GALSON WILL HAVE 500KW OF POWER AVAILABLE TO THEM AFTER HOOK UP IS COMPLETE.

PHILIP YOUNG, OSC
US EPA, REGION III
PHILADELPHIA, PA

100264

To: ARD DEPA9371
From: ARD DEPA9374
Subject: POLREP 63 FOR BELFIELD AVE.
Mail id: IFM-63-681004-118270850

POLREP 63
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE MARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; OCTOBER 2, 1988)

- A. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL. THEY ARE ON SITE ASSEMBLING THEIR ON-SITE TREATMENT PROCESS WHICH WILL TAKE APPROX. TWO WEEKS WORKING 7 DAYS A WEEK.
- B. WEATHER: CLOUDY, COOL, HIGH'S IN THE 60'S.
- C. PERSONNEL ON SCENE: EPA-1, TAT-1, ERCS-1, GALSON-2
- D. ESTIMATED COSTS TO DATE: COB 10/5/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$14.5K	55K
TAT	\$6.9K	100K
ERCS	\$66.9K	800K
EPA (INDIRECT)	\$5.2K	111K
TOTAL	\$93.5K	916K

TOTAL PROJECT CEILING \$1,026,000

- E. OSC MAINTAINING CONTACT WITH RF VERNON AND MR. WOLFE (PERSPECTIVE BUYER OF THE BUILDING).

II. ACTIONS TAKEN

- A. GALSON RESEARCH CONTINUES TO SET UP THEIR ON SITE TREATMENT PROCESS. THEY WILL BE ON SITE FULL TIME FOR THE NEXT 6 TO 8 WEEKS.
- B. ANCHOR FENCE WAS ON SCENE THIS DATE TO CONTINUE BUILDING A FENCE AROUND THE GENERATORS LOCATED ON THE SIDEWALK AND A SWING FENCE DOOR AT THE ENTRANCE OF THE GARAGE.
- C. ERCS PCT ON SITE TO MONITOR SUBCONTRACTOR, MAKE DAILY REPORT AND ANY ARRANGEMENTS THAT NEED TO BE TAKEN CARE OF.

100265

- D. ERCS TORE DOWN THE WOODEN CAMP BUILT OVER THE FIRE HOSE IN FRONT OF A HEAVILY TRAFFICED PARKING LOT THIS DATE. ARRANGEMENTS WERE MADE FOR ANCHOR RMCE TO DIG OUT A SECTION OF THE CONCRETE TO DROP THE FIREHOSE BELOW THE SURFACE. THIS SECTION OF HOSE WILL BE PLACED IN FID PIPE FOR PROTECTION.
- E. GALSON RECEIVED A SHIPMENT OF 1 INX FOX AIR FILTERS WITH HIGH VAPOR ACTIVITY CHARCOAL MEDIUMS AND 10 MORE DRUMS OF POTASSIUM HYDROXIDE REAGENT.
- F. OSC SPOKE WITH ROGER GALL OF GALSON RESEARCH TO DECIDE WHAT WILL BE DONE WITH THE 8,000 GALLONS OF TREATED WASTE FOLLOWING PROCESSING. 2500 GALLONS OF MATERIAL WILL BE TREATED BUT DUE TO ALL THE REAGENT CHEMICALS THAT ARE ADDED THERE WILL BE APPROX. 5,000 GALLONS OF CAUSTIC. OSC STATED THAT A SAMPLE WILL BE TAKEN AND A TEST FACILITY WILL BE FOUND THAT WILL ACCEPT CAUSTICS. THE CHARCOAL FILTERS WILL BE DISPOSED OF WITH THE CAUSTICS AND THE REACTION VESSEL CLEANNED (THE WATER BEING ADDED TO THE PRODUCT).
THE FOLLOWING SCHEDULE WAS GIVEN BY GALL:

OCTOBER 17: SET UP COMPLETE.

OCTOBER 20: A TEST ON THE MECHANICS OF
OF THE VESSEL WILL THEN BE RUN FOR 48 HOURS.

OCTOBER 24 OR 25: BEGIN LOADING CONTENTS OF WASTE
CONTAINERS INTO REACTION VESSEL
(APPROX. ONE WEEK)

NOVEMBER 1: BEGIN TREATMENT PROCESS (APPROX. 10 DAYS) TO
DETOXIFY WASTE SAMPLES WILL BE TAKEN AND ANALYZED BY
GALSON THROUGHOUT THE ENTIRE PROCESS AND THE REACTION
CEASED WHEN NO PCB IS PRESENT. THE OSC WAS ALSO INFORMED
OF AN ADDITIONAL COST THAT WILL BE INCURRED FOR THE TEAR
DOWN OF THE APPARATUS. GALSON WILL NOTIFY THE OSC BEFORE
THE TEAR DOWN BEGINS.

- G. OSC SPOKE WITH FAS HENRY THIS DATE AND LEARNED THAT THE PR FOR AN ADDITIONAL \$150,000 HAD BEEN APPROVED FOR ERCS.
- H. OSC SPOKE WITH ERCS FCT TO DISCUSS THE TEAR DOWN PHASE OF THE PROJECT. THE OSC WANTS TO REVIEW THE CONTRACTUAL AGREEMENT BETWEEN OHMATERIALS AND GALSON TO DETERMINE WHO SHOULD BE RESPONSIBLE FOR TEAR-DOWN AND WHETHER EPA SHOULD HAVE TO PAY ADDITIONAL MONEYS FOR THIS PHASE. THE EPA IS ALREADY COMMITTED TO PAY FOR LABORATORY, PROJECT SETUP, AND ON-SITE TREATMENT AS WELL AS ALL THE PREP WORK DONE PRIOR TO GALSON'S VISIT.

100266

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RF VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RF VERNON.
- B. ARCS TO BUILD BERM NEXT WEEK FOR GALSON'S PROCESSING AREA.
- C. ANALYTICAL RESULTS TO BE RECEIVED FOR SAMPLES TAKEN ON VISUAL PACKAGING SIDE OF THE BUILDING AND FOR TRANSFORMER (PCB) SAMPLES. ALL ANALYTICAL WILL BE RECEIVED BY 10/14/88.
- D. GALSON TO CONTINUE WITH ON SITE TREATMENT SET-UP.
- E. ANCHOR FENCE TO FINISH WORK ON: THE SWING FENCE DOOR FOR THE GARAGE ENTRANCE, THE FENCE AROUND THE GENERATORS AND THE SLITCH GORGE THE SIDEWALK TO BURY THE FIREHOSE.
- H. ARCS ELECTRICIAN TO BE ON SITE BY 10/6/88 TO COMPLETE ELECTRICAL HOOK UP FOR THE THIRD GENERATOR. GALSON WILL HAVE COOKIN OF POWER AVAILABLE TO THEM AFTER HOOK UP IS COMPLETE.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100267

To: ERD/DEER (EPA9311)
To: REGIONAL TAT (EPA9322)
To: P.YOUNG (EPA9347)
To: ERC (EPA9374)
From: ERC (EPA9374) Delivered: Wed 12-Oct-88 14:43 EDT Sys
Subject: POLAR 64 FOR BELFIELD AVE. SITE
Mail To: IPH-163-881012-132580499

POLAR 64

BELFIELD AVENUE SITE

PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES FLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS: OCTOBER 6, 1988)

- A. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL. THEY ARE ON SITE ASSEMBLING THEIR ON-SITE TREATMENT PROCESS WHICH WILL TAKE APPROX. TWO WEEKS WORKING 7 DAYS A WEEK.
- B. WEATHER: CLOUDY, COOL, HIGH'S IN THE 60'S.
- C. PERSONNEL ON SCENE: EPA-1, TAT-2, ERCS-1, GALSON-2
- D. ESTIMATED COSTS TO DATE: COB 10/6/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$ 14.7K	55K
TAT	57.7K	100K
ERCS	573.5K	800K
EPA (INDIRECT)	38.6K	111K
TOTAL	681.5K	916K
TOTAL PROJECT CEILING \$1,326,000		

- E. OSC MAINTAINING CONTACT WITH RF VERNON AND MR. WOLFE (PERSPECTIVE BUYER OF THE BUILDING).

II. ACTIONS TAKEN

- A. GALSON RESEARCH CONTINUES TO SET UP THEIR ON SITE TREATMENT PROCESS. THEY WILL BE ON SITE FULL TIME FOR THE NEXT 6 TO 8 WEEKS.
- B. ANCHOR FENCE WAS ON SCENE THIS DATE TO PUT UP A SWING FENCE DOOR AT THE ENTRANCE OF THE GARAGE AND SECURE A DOORWAY THROUGH WHICH AN INTRUDER HAD ENTERED PREVIOUSLY.
- C. ERCS PCT ON SITE TO MONITOR SUBCONTRACTOR, MAKE DAILY REPORT AND ANY ARRANGEMENTS THAT NEED TO BE TAKEN CARE OF.
- D. GALSON RECEIVED A SHIPMENT OF 20 DRUMS OF DIMETHYL SULFOXIDE (DMSO) REAGENT.

100268

- E. ERCS ELECTRICIAN FINISHED HOOKING UP THE THIRD GENERATOR TO SUPPLY POWER FOR GALSON'S REACTION PROCESS.
- F. AL WOLFE (PERSPECTIVE BUYER) ON SCENE THIS DATE WITH AN ARCHITECT AND ENGINEER TO TAKE A WALK THROUGH THE BUILDING AND SPEAK WITH THE OSC ABOUT THE SCHEDULE OF WORK. MR. WOLFE IS STILL PUTTING TOGETHER A PROPOSAL FOR PURCHASING AND CONVERTING THE BUILDING INTO A SHOPPING MALL AFTER THE EPA REMOVAL IS COMPLETE.

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.
- B. ERCS TO BUILD BERM NEXT WEEK FOR GALSON'S PROCESSING AREA.
- C. ANALYTICAL RESULTS TO BE RECEIVED FOR SAMPLES TAKEN ON VISUAL PACKAGING SIDE OF THE BUILDING AND FOR TRANSFORMER (PCB) SAMPLES. ALL ANALYTICAL WILL BE RECEIVED BY 10/14/86.
- D. GALSON TO CONTINUE WITH ON SITE TREATMENT SET-UP. THEY HAVE YET TO RECEIVE A SHIPMENT OF POLYETHYLENE GLYCOL (PEG), A MOTOR MIXER, AND THE REACTION VESSEL.
- E. ANCHOR FENCE TO FINISH WORK ON: THE FENCE AROUND THE GENERATORS AND THE DITCH ACROSS THE SIDEWALK TO BURY THE FIREHOSE.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100269

To: ERD/DEER (EPA5511)
 To: REGIONAL TAT (EPA9322)
 To: P. YOUNG (EPA9347)
 To: ARC (EPA9374)
 From: ARC (EPA9374) Delivered: Wed 12-Oct-88 14:52 EDT Sys
 Subject: 1-0FOLREF 50 FOR BELFIELD AVE. SITE
 Mail Id: (PN-163-881012-133871078)

POLREF 065

BELFIELD AVENUE SITE

PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; OCTOBER 10, 1988)

- A. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL. THEY ARE ON SITE ASSEMBLING THEIR ON-SITE TREATMENT PROCESS WHICH WILL TAKE APPROX. TWO WEEKS WORKING 7 DAYS A WEEK.
- B. WEATHER: SUNNY, WARM, HIGH'S IN THE 60'S.
- C. PERSONNEL ON SCENE: EPA-0, TAT-1, ERCS-1, GALSON-2
- D. ESTIMATED COSTS TO DATE: COB 10/10/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$ 14.7K	55K
TAT	60.7K	100K
ERCS	601.9K	800K
EPA (INDIRECT)	35.6K	111K
TOTAL	712.9K	916K

TOTAL PROJECT CEILING \$1,326,000

- E. OSC MAINTAINING CONTACT WITH RP VERNON AND MR. WOLFE (PERSPECTIVE BUYER OF THE BUILDING).
- F. OSC OFF SITE THIS DATE DUE TO OTHER REGIONAL COMMITMENTS.

II. ACTIONS TAKEN

- A. GALSON RESEARCH CONTINUES TO SET UP THEIR ON SITE TREATMENT PROCESS. THEY WILL BE ON SITE FULL TIME FOR THE NEXT 4 TO 8 WEEKS.
- B. ANCHOR FENCE ON SCENE 10/7/88 TO FINISH WORK ON FENCE AROUND THE GENERATORS. 100270
- C. ERCS PCT ON SITE TO MONITOR SUBCONTRACTOR, MAKE DAILY REPORT AND ANY ARRANGEMENTS THAT NEED TO BE TAKEN CARE OF.

- D. GALSON RECEIVED A SHIPMENT OF 10 DRUMS OF POLYETHYLENE GLYCOL REAGENT ON 10/7/88 AND TWO SMALL OFFICE TRAILERS WHICH WERE PLACED INSIDE THE BUILDING TO BE USED WHEN THE PROCESS IS RUNNING 24 HOURS A DAY.
- E. RF VERNON ON SCENE 10/7/88 WITH A DRUM LOG TO DETERMINE WHICH DRUMS HE MAY BE ABLE TO HANDLE (REMOVE). HE STATED THAT A LETTER OF INTENT FROM DELAWARE CONTAINER CONCERNING THE DRUMS OF FLAMMABLE LIQUIDS (FUEL OIL) WAS MAILED THIS DATE. DELAWARE CONTAINER IS APPARENTLY INTERESTED IN REMOVING THE DRUMS FROM THE SITE FOR PRODUCT USE AS A FUEL SOURCE.
- F. THE ANALYTICAL RESULTS WERE RECEIVED ON 10/7/88 FOR PCB SAMPLES TAKEN ON 9/30/88. ALL SAMPLES WERE IN THE RANGE OF 3 TO 4 PPM. THEY ARE NOT RCRA WASTES. THE OSC DETERMINED THAT BECAUSE ALL TRANSFORMERS ARE NON PCB, THEY WILL REMAIN ON SITE.
- G. ON 10/7/88 ERCS PCT, UNDER DIRECTION OF THE OSC, APPROACHED THE GAS CO. LOCATED BESIDE THE SITE ABOUT TRENCHING THE SIDEWALK IN FRONT OF THEIR PARKING LOT TO DROP THE FIREHOSE IN SO IT DOESN'T GET RUN OVER. THE GAS CO. REP. SAID THAT THEY WOULD BLOCK OFF THAT ENTRANCE TO THE PARKING LOT SO THE SIDEWALK WOULD NOT HAVE TO BE DUG UP.
- H. T. O'HARA, ERCS COORDINATOR, ON SCENE THIS DATE TO DELIVER ANALYTICAL REPORTS AND SITE SKETCHES. HE REVIEWED THE DATA WITH THE OSC, WHO WILL BE COORDINATING THE MANAGEMENT OF WASTE CONTAINERS WITH GALSON.
- I. ERCS ELECTRICIAN ON SCENE THIS DATE AT 2100 HOURS TO HOOK UP THE POWER ON THE THIRD GENERATOR PER REQUEST OF GALSON. THIS REQUEST WAS GIVEN AT LAST MINUTE AS GALSON HAD SAID PREVIOUSLY THAT THEY WOULD NOT NEED POWER HOOK UP UNTIL NEXT WEEK.

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RF VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RF VERNON.
- B. ERCS TO DIG OUT THE LOADING DOCK AREA BY APPROX. FOUR FEET TO ACCOMMODATE GALSON'S REACTION VESSEL. PROCESS BERMS WILL BE CONSTRUCTED BY ERCS IN THIS AREA THE WEEK OF 10/17/88

100271

- C. ANALYTICAL RESULTS TO BE RECEIVED BY 10/14/88 FOR WASTE COMPATIBILITY SAMPLES TAKEN ON THE VISUAL PACKAGING SIDE OF THE BUILDING. UPON RECEIPT OF THE DATA, A CLEANING SCHEME WILL BE DEVELOPED AND PROPOSED TO THE OSC BY TAT.
- D. GALSON TO CONTINUE WITH ON SITE TREATMENT SET-UP. THEY HAVE YET TO RECEIVE A MOTOR MIXER, AND THE REACTION VESSEL.
- E. ERCS TO RECEIVE 10 OVERPACK DRUMS FOR THE CONTAMINATED VISQUEEN.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100272

To: ERD/OERR (EPA5511)
 To: REGION03.TAT (EPA9322)
 To: P.YOUNG (EPA9347)
 To: RRC (EPA9374)
 From: RRC (EPA9374) Delivered: Thu 13-Oct-88 13:06 EDT Sy
 Subject: POLREP 66 FOR BELFIELD AVE. SITE
 Mail Id: IPM-163-881013-117951117

POLREP 66
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; OCTOBER 12, 1988)

- A. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL. THEY ARE ON SITE ASSEMBLING THEIR ON-SITE TREATMENT PROCESS WHICH WILL TAKE APPROX. TWO WEEKS WORKING 7 DAYS A WEEK.
- B. WEATHER: COOL, WINDY, HIGH'S IN THE LOW 60'S.
- C. PERSONNEL ON SCENE: EPA-1, TAT-1, ERCS-1, GALSON-2
- D. ESTIMATED COSTS TO DATE: COB 10/12/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$15.0 K	55K
TAT	61.4 K	100K
ERCS	614.6 K	800K
EPA (INDIRECT)	36.0 K	111K
TOTAL	727.0 K	916K
TOTAL PROJECT CEILING \$1,326,000		

- E. OSC MAINTAINING CONTACT WITH RP VERNON AND MR. WOLFE (PERSPECTIVE BUYER OF THE BUILDING).
- F. OSC OFF SITE 10/11/88 THIS DATE DUE TO OTHER REGIONAL COMMITMENTS.

II. ACTIONS TAKEN

- A. GALSON RESEARCH CONTINUES TO SET UP THEIR ON SITE TREATMENT PROCESS. THEY WILL BE ON SITE FULL TIME FOR THE NEXT 6 TO 8 WEEKS FOR SET-UP, TEST RUNS, ON-SITE TREATMENT, TEAR-DOWN, AND TO PROVIDE ASSISTANCE WITH DISPOSAL ARRANGEMENTS FOR THE TREATED BATCH WASTE. 100273
- B. ERCS PCT ON SITE TO MONITOR SUBCONTRACTOR, MAKE DAILY REPORT AND ANY ARRANGEMENTS THAT NEED TO BE TAKEN CARE OF.

- C. GALSON RECEIVED A SHIPMENT OF 10 OVERPACK DRUMS ON 10/11/88 FOR CONTAMINATED VISQUEEN, A 10K GENERATOR AND 2 MOTOR MIXERS.
- D. THE PHILA. FIRE MARSHALL WAS ON SCENE 10/11/88 TO INSPECT THE SECURITY OF THE SITE WITH RESPECT TO THE GENERAL PUBLIC.
- E. TWO REFS. WHO APPARENTLY WORKED IN THE BUILDING IN THE PAST WERE ON SCENE 10/11/88 TO INQUIRE ABOUT A PIECE OF MACHINERY ON THE VISUAL PACKAGING SIDE OF THE BUILDING. THEY CLAIMED THAT THE MACHINE IS A SEPARATOR BUT THEY CAN NOT GET IT OUT BECAUSE OF THE FENCE THAT WAS CONSTRUCTED TO SECURE THE DRUM STAGING AREA. THE SEPARATOR WILL HAVE TO BE TAKEN APART AND REMOVED THROUGH AN ALTERNATE ROUTE. THEY WERE TOLD TO HAVE RP VERNON CALL THE OSC BEFORE THEY TAKE THE SEPARATOR OUT OF THE BUILDING.
- F. T. O'HARA, ERCS COORDINATOR, ON SCENE THIS DATE TO DELIVER MORE ANALYTICAL REPORTS AND SITE SKETCHES. INCLUDED IN THIS WAS A LIST OF THE PCP CONTAMINATED CONTAINERS. O'HARA ALSO SPOKE WITH GALSON'S MANAGER WHO STATED THAT THE TEAR DOWN COST IS INCLUDED IN THE BID FOR PHASE III AND AN ADDITIONAL COST WILL NOT BE INCURRED.
- G. GALSON'S SUBCONTRACTORS ON SCENE AT 0700 HOURS THIS DATE TO DIG OUT THE LOADING DOCK AREA BY APPROX. FOUR FEET TO ACCOMMODATE GALSON'S REACTION VESSEL.
- H. GALSON RECEIVED A RADIATOR THIS DATE FOR THEIR REACTION PROCESS.
- I. TWO REFS. OF AN ARCHITECTURAL FIRM WERE ON SCENE THIS DATE TO RECEIVE PERMISSION FROM THE OSC TO TAKE SOME MEASUREMENTS INSIDE THE BUILDING FOR THE WISTER STATION MALL PLANS.

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON. THE OSC STILL HAS NOT RECEIVED A LETTER FROM DELAWARE CONTAINER AGREEING TO REMOVE FLAMMABLE LIQUIDS FROM VERNON'S SIDE OF THE BUILDING.
- B. ANALYTICAL RESULTS TO BE RECEIVED BY 10/14/88 FOR WASTE COMPATIBILITY SAMPLES TAKEN ON THE VISUAL PACKAGING SIDE OF THE BUILDING. UPON RECEIPT OF THE DATA, A BULKING SCHEME WILL BE DEVELOPED AND PROPOSED TO THE OSC BY TAT.
- C. GALSON TO CONTINUE WITH ON SITE TREATMENT SET-UP. THEY HAVE YET TO RECEIVE THE ADDITIONAL CHEMICALS NECESSARY FOR THE REACTION PROCESS AND VESSEL.

100274

D. ERCS TO HAVE TWO TECHS ON SITE MONDAY 10/17/88 TO ASSIST GALSON IN SPREADING HYPALON RUBBER IN THE LOADING DOCK AREA FOR BERMING AROUND THE REACTION VESSEL.

E. TENTATIVE SCHEDULE OF EVENTS ACCORDING TO GALSON RESEARCH:

MON., 10/17/88-SPREAD HYPALON RUBBER IN THE LOADING DOCK AREA FOR BERMING UNDER THE REACTION VESSEL

TUES., 10/18/88-DELIVERY OF THE REACTION VESSEL WHICH WILL TAKE A WEEK TO PLUMB AND A 48 HOUR TEST RUN WILL BE DONE WITH WATER

WED., 10/26/88-GALSON WILL TAKE A THREE DAY BREAK BEFORE STARTING THE REACTION PROCESS

MON., 10/31/88-BEGIN LOADING PCF CONTAMINATED CONTAINER CONTENTS INTO REACTION VESSEL WHICH WILL TAKE APPROX. A WEEK

MON., 11/7/88-BEGIN REACTION PROCESS WHICH WILL RUN 24 HOURS A DAY FOR APPROX. 10 DAYS

THURS. 11/17/88-WASTE DISPOSAL ANALYSIS WILL BE DONE FROM THE TREATED BATCH WASTE AND FINAL TRANSPORTATION AND DISPOSAL ARRANGEMENTS WILL BE MADE.

NOTE 1: THE WASTE MATERIAL CURRENTLY LOCATED ON VERNON'S SIDE OF THE BUILDING (VISUAL PACKAGING CO.) WILL BE BULKED, SAMPLED, STAGED, TRANSPORTED, AND DISPOSED OF DURING THE NEXT SIX TO EIGHT WEEKS, ie. CONCURRENT BUT INDEPENDENT OF GALSON'S WORK.

NOTE 2: THE ABOVE STATED "TENTATIVE SCHEDULE OF EVENTS" IS 100% DEPENDENT ON THE TIMELY AND ACCURATE COMPLETION OF GALSON'S PHASE 1 WORK-"THE LABORATORY SIMULATION PROCESS".

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100275

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Tue 18-Oct-88 9:17 EDT Sys
Subject: POLREP 67 FOR BELFIELD AVE. SITE
Mail Id: IPM-163-881018-083551036

POLREP #67
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; OCTOBER 14, 1988)

- A. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL. THEY ARE ON SITE ASSEMBLING THEIR ON-SITE TREATMENT PROCESS WHICH WILL TAKE APPROX. TWO WEEKS WORKING 7 DAYS A WEEK.
- B. WEATHER: COOL, SUNNY, HIGH'S IN THE LOW 60'S.
- C. PERSONNEL ON SCENE: EPA-0, TAT-1, ERCS-1, GALSON-1
- D. ESTIMATED COSTS TO DATE: COB 10/14/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$15.3 K	55K
TAT	62.0 K	100K
ERCS	627.2 K	800K
EPA (INDIRECT)	36.4 K	111K
TOTAL	740.9 K	916K
TOTAL PROJECT CEILING \$1,326,000		

- E. OSC MAINTAINING CONTACT WITH RP VERNON AND MR. WOLFE (PERSPECTIVE BUYER OF THE BUILDING).
- F. OSC OFF SITE THIS DATE DUE TO OTHER REGIONAL COMMITMENTS.

II. ACTIONS TAKEN

- A. GALSON RESEARCH CONTINUES TO SET UP THEIR ON SITE TREATMENT PROCESS. THEY WILL BE ON SITE FULL TIME FOR THE NEXT 6 TO 8 WEEKS FOR SET-UP, TEST RUNS, ON-SITE TREATMENT, TEAR-DOWN, AND TO PROVIDE ASSISTANCE WITH DISPOSAL ARRANGEMENTS FOR THE TREATED BATCH WASTE.
- B. ERCS PCT ON SITE TO MONITOR SUBCONTRACTOR, MAKE DAILY REPORT AND ANY ARRANGEMENTS THAT NEED TO BE TAKEN CARE OF.

100276

- C. GALSON RECEIVED A SHIPMENT ON 10/13/88 OF 10 DRUMS OF TRIETHYLENE GLYCOL METHYL ETHER AND HIGHER REAGENT TO BE USED IN THE ON-SITE TREATMENT PROCESS.
- D. GALSON'S SUBCONTRACTORS ON SCENE AT 0900 HOURS THIS DATE TO FINISH LEVELING AND SHORING THE WALLS OF THE LOADING DOCK AREA TO ACCOMMODATE GALSON'S REACTION VESSEL.
- E. ERCS AND GALSON MADE LEVEL B ENTRY 10/13/88 INTO THE FLAMMAE MATERIALS VAULT TO LOOK FOR DRUMS AND PAILS MISSING FROM THE STAGING AREA. ALL OF THE MISSING DRUMS WERE FOUND BUT THERE ARE STILL APPROX. 15 PAILS MISSING. THERE IS A GOOD POSSIBILITY THAT THESE PAILS COULD HAVE BEEN STOLEN DUE TO NUMEROUS BREAK-INS INTO THE BUILDING.
- F. GALSON WENT THROUGH ALL THE STAGED DRUMS AND IT TURNS OUT THAT THERE ARE 30 DRUMS IN WHICH GALSON NEEDS MORE SAMPLE OR DOES NOT HAVE A SAMPLE FOR.
- G. THE ANALYTICAL RESULTS FOR THE SAMPLES TAKEN ON VERNON'S SITE OF THE BUILDING HAVE STILL NOT BEEN RECEIVED AS OF THIS DATE EVEN THOUGH THEY SHOULD HAVE BEEN RECEIVED 10/13/88.

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON. THE OSC STILL HAS NOT RECEIVED A LETTER FROM DELAWARE CONTAINER AGREEING TO REMOVE FLAMMABLE LIQUIDS FROM VERNON'S SIDE OF THE BUILDING.
- B. ANALYTICAL RESULTS TO BE RECEIVED FOR WASTE COMPATIBILITY SAMPLES TAKEN ON THE VISUAL PACKAGING SIDE OF THE BUILDING. UPON RECEIPT OF THE DATA, A BULKING SCHEME WILL BE DEVELOPED AND PROPOSED TO THE OSC BY TAT.
- C. GALSON TO CONTINUE WITH ON SITE TREATMENT SET-UP. THE VESSEL WILL BE DELIVERED ON FRI., 10/21/88.
- D. ERCS TO HAVE TWO TECHS ON SITE WED. 10/19/88 TO ASSIST GALSON IN SPREADING HYPALON RUBBER IN THE LOADING DOCK AREA FOR BERMING AROUND THE REACTION VESSEL.
- E. ERCS TO SAMPLE THE 30 PCP CONTAMINATED DRUMS TUES. 10/18/88 WHICH WILL BE ANALYZED BY GALSON'S LABORATORY. GALSON WILL THEN RUN ANOTHER BATCH REACTION ON THESE SAMPLES BUT THIS SHOULD NOT POSTPONE THE PROJECT AT ALL.

100277

F. TENTATIVE SCHEDULE OF EVENTS ACCORDING TO GALSON RESEARCH; THERE MAY BE CHANGES MADE TO THIS DAILY AS GALSON RECEIVES REVISIONS FROM THEIR OFFICE.

WED.. 10/19/88-SPREAD HYPALON RUBBER IN THE LOADING DOCK AREA FOR BERMING UNDER THE REACTION VESSEL

FRI.. 10/21/88-DELIVERY OF THE REACTION VESSEL WHICH WILL TAKE A WEEK TO PLUMB AND A 48 HOUR TEST RUN WILL BE DONE WITH WATER

MON.. 10/31/88-GALSON WILL TAKE A THREE DAY BREAK BEFORE STARTING THE REACTION PROCESS

THURS.. 11/3/88-BEGIN LOADING PCP CONTAMINATED CONTAINER CONTENTS INTO REACTION VESSEL WHICH WILL TAKE APPROX. A WEEK

TUES.. 11/8/88-BEGIN REACTION PROCESS WHICH WILL RUN 24 HOURS A DAY FOR APPROX. 10 DAYS

FRI.. 11/18/88-WASTE DISPOSAL ANALYSIS WILL BE DONE FROM THE TREATED BATCH WASTE AND FINAL TRANSPORTATION AND DISPOSAL ARRANGEMENTS WILL BE MADE

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100278

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9373)
From: RRC (EPA9374) Delivered: Wed 19-Oct-88 3:29 EDT Sys
Subject: MAIL
Mail Id: IPM-143-861019-077890034

POLMER 188

BELFIELD AVENUE SITE

PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; OCTOBER 18, 1988)

- A. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL. THEY ARE ON SITE ASSEMBLING THEIR ON-SITE TREATMENT PROCESS WHICH WILL TAKE APPROX. TWO WEEKS WORKING 7 DAYS A WEEK.
- B. WEATHER: WARM, DRIZZLE, HIGH'S IN THE LOW 70'S.
- C. PERSONNEL ON SCENE: EPA-0, TAT-1, ERCS-3, GALSON-1
- D. ESTIMATED COSTS TO DATE: COB 10/18/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$ 15.3K	55K
TAT	62.4K	100K
ERCS	635.9K	800K
EPA (INDIRECT)	34.4K	111K
TOTAL	750.0K	916K

TOTAL PROJECT CEILING \$1,326,000

- E. OSC MAINTAINING CONTACT WITH RP VERNON AND MR. WOLFE (PERSPECTIVE BUYER OF THE BUILDING).
- F. OSC OFF SITE THIS DATE DUE TO OTHER REGIONAL COMMITMENTS.

II. ACTIONS TAKEN

- A. GALSON RESEARCH CONTINUES TO SET UP THEIR ON SITE TREATMENT PROCESS. THEY WILL BE ON SITE FULL TIME FOR THE NEXT 6 TO 8 WEEKS FOR SET-UP, TEST RUNS, ON-SITE TREATMENT, TEAR-DOWN, AND TO PROVIDE ASSISTANCE WITH DISPOSAL ARRANGEMENTS FOR THE TREATED BATCH WASTE. 100279
- B. ERCS PCT ON SITE TO MONITOR SUBCONTRACTOR, MAKE DAILY REPORT AND ANY ARRANGEMENTS THAT NEED TO BE TAKEN CARE OF.

- C. A REP. FROM PHILA. DEPT. OF LICENSING AND INSPECTION ON SCENE 10/17/88 TO GET AN UPDATE ON PROJECT ACTIVITIES.
- D. A REP. FROM VALLEY FORGE LABS ON SCENE 10/17/88 BY REQUEST OF THE ARCHITECT FOR WISTER STATION MALL TO TAKE A WALK THROUGH THE BUILDING.
- E. ERCS SAMPLED 31 PCP CONTAMINATED CONTAINERS THIS DATE THAT GALSON NEEDED FOR THEIR BATCH PROCESS. WHEN THE DRUMS WERE ORIGINALLY SAMPLED BY ERCS THE SAMPLES WERE SENT TO ANALYTIKEM LABS WHO ANALYZED THEM AND THEN SENT THE REMAINS THE SAMPLE ON TO GALSON'S LAB. MANY OF THE SAMPLES DID NOT CONTAIN ENOUGH MATERIAL FOR GALSON'S BATCH PROCESS AND THERE WERE SOME SAMPLES THAT WERE NEVER RECEIVED.
- F. AL WOLFE (PERSPECTIVE BUYER) ON SCENE AT 0900 THIS DATE TO TAKE A WALK THROUGH THE BUILDING.
- G. ERCS LINED THE LOADING DOCK AREA THIS DATE WITH HYPALON RUBB. TO SERVE AS A BERM FOR THE REACTION VESSEL.
- H. CAPT. McALEER OF THE HAZ MAT ADMIN. OF THE PHILA. FIRE DEPT. WAS ON SCENE THIS DATE TO DISCUSS A CONTINGENCY PLAN WITH LT. VILEIKIS OF LADDER #8 FIRE CO. AND LT. FARRELL OF ENGINE #19 FIRE CO. WHO WOULD BE THE FIRST RESPONDERS ON SCENE IF THERE WAS AN EMERGENCY. IF THERE WERE AN EMERGENCY IT WAS DECIDED THAT THE PGW PARKING LOT BESIDE THE BUILDING WOULD BE USED AS A STAGING AREA AND THE GAS STATION DIRECTLY ACROSS THE STREET WOULD BE THE SITE OF AN ALTERNATE COMMAND POST LOCATION.
- I. THE ANALYTICAL RESULTS FOR THE SAMPLES TAKEN ON THE VISUAL PACKAGING SIDE OF THE BUILDING WERE DELIVERED TO SITE THIS DATE BY A REP. FROM QC LABS.

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON. THE OSC STILL HAS NOT RECEIVED A LETTER FROM DELAWARE CONTAINER AGREEING TO REMOVE FLAMMABLE LIQUIDS FROM VERNON'S SIDE OF THE BUILDING.
- B. GALSON TO CONTINUE WITH ON SITE TREATMENT SET-UP. THE REACTION VESSEL WILL BE DELIVERED ON FRI., 10/21/88.

100280

C. SCHEDULE OF EVENTS ACCORDING TO THE OSC FOR BULKING AND DISPOSAL OF THE DRUMS ON THE VISUAL PACKAGING SIDE OF THE BUILDING:

NOV., 6, 1988-BULKING SCHEME FINISHED

NOV., 10, 1988-BULKING OF THE DRUMS FINISHED

NOV., 30, 1988-ALL DISPOSAL FACILITIES OBTAINED

F. TENTATIVE SCHEDULE OF EVENTS ACCORDING TO GALSON RESEARCH; THERE MAY BE CHANGES MADE TO THIS DAILY AS GALSON RECEIVES REVISIONS FROM THEIR OFFICE.

WED., 10/19/88-SPREAD HYPALON RUBBER IN THE LOADING DOCK AREA FOR BURNING UNDER THE REACTION VESSEL

FRI., 10/21/88-DELIVERY OF THE REACTION VESSEL WHICH WILL TAKE A WEEK TO PLUMB AND A 48 HOUR TEST RUN WILL BE DONE WITH WATER

MON., 10/31/88-GALSON WILL TAKE A THREE DAY BREAK BEFORE STARTING THE REACTION PROCESS

THURS., 11/3/88-BEGIN LOADING PCP CONTAMINATED CONTAINER CONTENTS INTO REACTION VESSEL WHICH WILL TAKE APPROX. A WEEK

TUES., 11/8/88-BEGIN REACTION PROCESS WHICH WILL RUN 24 HOURS A DAY FOR APPROX. 10 DAYS

FRI., 11/18/88-WASTE DISPOSAL ANALYSIS WILL BE DONE FROM THE TREATED BATCH WASTE AND FINAL TRANSPORTATION AND DISPOSAL ARRANGEMENTS WILL BE MADE

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100281

To: ERD/OERR (EPAG311)
To: REGION03.TAT (EPAG322)
To: P.YOUNG (EPAG347)
To: ARC (EPAG374)
From: ARC (EPAG374) Delivered: Fri 21-Oct-88 1:40 EDT Sys
Subject: POLKEP 44 FOR BELFIELD AVE SITE
Mail To: IPM-163-881021-078070963

POLKEP 44

BELFIELD AVENUE SITE

PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1900 HOURS: OCTOBER 20, 1988)

- A. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL. THEY ARE ON SITE ASSEMBLING THEIR ON-SITE TREATMENT PROCESS WHICH WILL TAKE APPROX. TWO WEEKS WORKING 7 DAYS A WEEK.
- B. WEATHER: SUNNY, COOL, HIGH'S IN THE 50'S.
- C. PERSONNEL ON SCENE: EPA-1, TAT-1, ERCS-1, GALSON-1
- D. ESTIMATED COSTS TO DATE: COB 10/20/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$ 15.3K	35K
TAT	64.1K	100K
ERCS	637.8K	800K
EPA (INDIRECT)	36.4K	111K
TOTAL	753.6K	916K
TOTAL PROJECT CEILING \$1,326,000		

- E. OSC MAINTAINING CONTACT WITH RP VERNON AND MR. WOLFE (PERSPECTIVE BUYER OF THE BUILDING).
- F. OSC OFF SITE THIS DATE DUE TO OTHER REGIONAL COMMITMENTS.

II. ACTIONS TAKEN

100282

- A. GALSON RESEARCH CONTINUES TO SET UP THEIR ON SITE TREATMENT PROCESS. THEY WILL BE ON SITE FULL TIME FOR THE NEXT 6 TO 8 WEEKS FOR SET-UP, TEST RUNS, ON-SITE TREATMENT, TEAR-DOWN, AND TO PROVIDE ASSISTANCE WITH DISPOSAL ARRANGEMENTS FOR THE TREATED BATCH WASTE.
- B. ERCS PCT ON SITE TO MONITOR SUBCONTRACTOR, MAKE DAILY REPORT AND ANY ARRANGEMENTS THAT NEED TO BE TAKEN CARE OF.

C. RP VERNON WAS INFORMED 10/19/88 THAT THE OSC WOULD LIKE DELAWARE CONTAINER TO HAVE THE DRUMS THAT THEY ARE CLAIMING OFF-SITE BY NOV. 8. MR. VERNON STATED THAT HE RECEIVED A LETTER OF INTENT FROM DELAWARE CONTAINER AND WAS MAILING IT TO OSC YOUNIS.

D. FAS HENRY ON SCENE THIS DATE TO INVOICE THE FILE.

III. FUTURE PLANS

A. OSC TO CONTINUE WORKING WITH RP VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON. THE OSC STILL HAS NOT RECEIVED A LETTER FROM DELAWARE CONTAINER AGREEING TO REMOVE FLAMMABLE LIQUIDS FROM VERNON'S SIDE OF THE BUILDING.

B. GALSON TO CONTINUE WITH ON SITE TREATMENT SET-UP. THE REACTION VESSEL WILL BE DELIVERED ON MON., 10/24/88.

C. SCHEDULE OF EVENTS ACCORDING TO THE OSC FOR BULKING AND DISPOSAL OF THE DRUMS ON THE VISUAL PACKAGING SIDE OF THE BUILDING:

NOV., 6, 1988-BULKING SCHEME FINISHED
NOV., 10, 1988-BULKING OF THE DRUMS FINISHED
NOV., 30, 1988-ALL DISPOSAL FACILITIES OBTAINED

F. TENTATIVE SCHEDULE OF EVENTS ACCORDING TO GALSON RESEARCH; THERE MAY BE CHANGES MADE TO THIS DAILY AS GALSON RECEIVES REVISIONS FROM THEIR OFFICE.

WED., 10/19/88-SPREAD HYPALON RUBBER IN THE LOADING DOCK AREA FOR BERMING UNDER THE REACTION VESSEL

MON., 10/24/88-DELIVERY OF THE REACTION VESSEL WHICH WILL TAKE A WEEK TO PLUMB AND A 48 HOUR TEST RUN WILL BE DONE WITH WATER

MON., 10/31/88-GALSON WILL TAKE A THREE DAY BREAK BEFORE STARTING THE REACTION PROCESS

THURS., 11/3/88-BEGIN LOADING PCP CONTAMINATED CONTAINER CONTENTS INTO REACTION VESSEL WHICH WILL TAKE APPROX. A WEEK

TUES., 11/8/88-BEGIN REACTION PROCESS WHICH WILL RUN 24 HOURS A DAY FOR APPROX. 10 DAYS

FRI., 11/18/88-WASTE DISPOSAL ANALYSIS WILL BE DONE FROM THE TREATED BATCH WASTE AND FINAL TRANSPORTATION AND DISPOSAL ARRANGEMENTS WILL BE MADE

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100283

To: ERD/DEAR (EPA9511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Tue 25-Oct-88 11:47 EDT 5y
Subject: POLREF TO FOR BELFIELD AVE. SITE
Mail Id: IPM-163-881025-106190091

BOLLEE #70

BELFIELD AVENUE SITE

PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; OCTOBER 24, 1988)

- A. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL. THEY ARE ON SITE ASSEMBLING THEIR ON-SITE TREATMENT PROCESS WHICH WILL TAKE APPROX. TWO WEEKS WORKING 7 DAYS A WEEK.
- B. WEATHER: SUNNY, COOL, HIGH'S IN THE 50'S.
- C. PERSONNEL ON SCENE: EPA-1, TAT-1, ERCS-1, GALSON-1
- D. ESTIMATED COSTS TO DATE: CQB 10/24/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$ 15.4K	55K
TAT	64.7K	100K
ERCS	644.8K	800K
EPA (INDIRECT)	36.4K	111K
TOTAL	761.3K	916K
TOTAL PROJECT CEILING \$1,326,000		

- E. QSC MAINTAINING CONTACT WITH RP VERNON AND MR. WOLFE (PERSPECTIVE BUYER OF THE BUILDING).

II. ACTIONS TAKEN

100284

- A. GALSON RESEARCH CONTINUES TO SET UP THEIR ON SITE TREATMENT PROCESS. THEY WILL BE ON SITE FULL TIME FOR THE NEXT 6 TO 8 WEEKS FOR SET-UP, TEST RUNS, ON-SITE TREATMENT, TEAR-DOWN, AND TO PROVIDE ASSISTANCE WITH DISPOSAL ARRANGEMENTS FOR THE TREATED BATCH WASTE.
- B. ERCS PCT ON SITE TO MONITOR SUBCONTRACTOR, MAKE DAILY REPORT AND ANY ARRANGEMENTS THAT NEED TO BE TAKEN CARE OF.

- C. DEVER HORSBYN OF THE FLEX-HESIVE CO. ON SCENE 10/21/88 TO TAKE A WALK THROUGH THE BUILDING AND LOOK FOR A FEW PIECES OF MACHINERY THAT BELONG TO HIM. TAT TOOK HIM THROUGH THE BUILDING TO LOCATE 3 DISPENSERS AND A RIBBON BLENDER. HE WAS TOLD TO NOTIFY RP VERNON AND THE OSC BEFORE HE TOOK ANYTHING OUT OF THE BUILDING.
- D. TAT IS IN THE PROCESS OF PUTTING TOGETHER A BULKING SCHEME FOR ALL THE CONTAINERS LOCATED ON RP VERNON'S SIDE OF THE BUILDING (VISUAL PACKAGING CO.). THESE WILL BE BULKED SIMULTANEOUSLY AS THE TREATMENT PROCESS IS GOING ON.
- E. THE LOADING DOCK AREA WAS FOUND WITH RAINWATER IN IT THIS DATE DUE TO A LEAKING ROOF ABOVE IT. GALSON WOULD LIKE A VISQUEEN ROOF BUILT ON THE FLOOR ABOVE IT TO PREVENT ANY LEAKING WHEN THE REACTION VESSEL IS SET UP IN THIS AREA.

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON. THE OSC STILL HAS NOT RECEIVED A LETTER FROM DELAWARE CONTAINER AGREEING TO REMOVE FLAMMABLE LIQUIDS FROM VERNON'S SIDE OF THE BUILDING.

- B. GALSON TO CONTINUE WITH ON SITE TREATMENT SET-UP. THE REACTION VESSEL WILL BE DELIVERED ON TUES., 10/25/88.

- C. SCHEDULE OF EVENTS ACCORDING TO THE OSC FOR BULKING AND DISPOSAL OF THE DRUMS ON THE VISUAL PACKAGING SIDE OF THE BUILDING:

NOV., 6, 1988-BULKING SCHEME FINISHED

NOV., 10, 1988-BULKING OF THE DRUMS FINISHED

NOV., 30, 1988-ALL DISPOSAL FACILITIES OBTAINED

- F. TENTATIVE SCHEDULE OF EVENTS ACCORDING TO GALSON RESEARCH; THERE MAY BE CHANGES MADE TO THIS DAILY AS GALSON RECEIVES REVISIONS FROM THEIR OFFICE.

TUES., 10/18/88-SPREAD HYPALON RUBBER IN THE LOADING DOCK AREA FOR BERMING UNDER THE REACTION VESSEL

TUES., 10/25/88-DELIVERY OF THE REACTION VESSEL WHICH WILL TAKE A WEEK TO PLUMB AND A 48 HOUR TEST RUN WILL BE DONE WITH WATER

WED., 11/2/88-GALSON WILL TAKE A THREE DAY BREAK BEFORE STARTING THE REACTION PROCESS

100285

MON., 11/7/88-BEGIN LOADING PCP CONTAMINATED CONTAINER
CONTENTS INTO REACTION VESSEL WHICH WILL
TAKE APPROX. A WEEK

MON., 11/14/88-BEGIN REACTION PROCESS WHICH WILL RUN 24
HOURS A DAY FOR APPROX. 10 DAYS

TUES., 11/21/88-WASTE DISPOSAL ANALYSIS WILL BE DONE
FROM THE TREATED BATCH WASTE AND FINAL
TRANSPORTATION AND DISPOSAL ARRANGEMENTS
WILL BE MADE

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100286

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Fri 28-Oct-88 10:59 EDT Sys
Subject: POLREP 71 FOR BELFIELD AVE. SITE
Mail Id: IPM-163-881028-098900370

POLREP #71
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; OCTOBER 26, 1988)

- A. GALSON RESEARCH, INC. HAS BEEN SUBCONTRACTED TO TREAT THE WASTE TO AN ACCEPTABLE LEVEL WHEREBY MAKING IT ACCEPTABLE FOR A PERMITTED FACILITY FOR DISPOSAL. THEY ARE ON SITE ASSEMBLING THEIR ON-SITE TREATMENT PROCESS WHICH WILL TAKE APPROX. TWO WEEKS WORKING 7 DAYS A WEEK.
- B. WEATHER: SUNNY, COOL, HIGH'S IN THE 50'S.
- C. PERSONNEL ON SCENE: EPA-1, TAT-2, ERCS-1, GALSON-4
- D. ESTIMATED COSTS TO DATE: COB 10/26/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$15.5K	55K
TAT	65.4K	100K
ERCS	645.7K	800K
EPA (INDIRECT)	36.5K	111K
TOTAL	763.1K	916K
TOTAL PROJECT CEILING \$1,326,000		

- E. OSC MAINTAINING CONTACT WITH RP VERNON AND MR. WOLFE (PERSPECTIVE BUYER OF THE BUILDING).

II. ACTIONS TAKEN

- A. GALSON RESEARCH CONTINUES TO SET UP THEIR ON SITE TREATMENT PROCESS. THEY WILL BE ON SITE FULL TIME FOR THE NEXT 6 TO 8 WEEKS FOR SET-UP, TEST RUNS, ON-SITE TREATMENT, TEAR-DOWN, AND TO PROVIDE ASSISTANCE WITH DISPOSAL ARRANGEMENTS FOR THE TREATED BATCH WASTE.
- B. ERCS PCT ON SITE TO MONITOR SUBCONTRACTOR, MAKE DAILY REPORT AND ANY ARRANGEMENTS THAT NEED TO BE TAKEN CARE OF.

100287

- C. KEN SIRMARCO OF DELAWARE CONTAINER NOTIFIED THE OSC BY TELEPHONE ON 10/25/88 OF THEIR INTEREST IN THE DRUMS ON THE ROOF OF THE BUILDING. THEY WILL TRANSPORT THE CONTENTS OF THE DRUMS OFF SITE AS A D001 FLAMMABLE LIQUID WASTE TO BE INCINERATED AT THEIR FACILITY AS AN ALTERNATIVE BLENDED FUEL IN THEIR CEMENT KILN. HE VERBALLY GUARANTEED THE OSC THAT UPON RECEIVING A GENERATOR ID# FROM RP VERNON, THEY WILL PUMP ALL THE FLAMMABLE LIQUID CONTENTS OF THE DRUMS ON THE ROOF FOR TRANSPORTING. NOVEMBER 8 WAS THE DEADLINE AGREED UPON.
- D. THE LARGE AND SMALL PROCESS TANKS ARRIVED ON SCENE 10/25/88. THEY WERE UNLOADED FROM THE TRUCKS AND POSITIONED ON THE SIDEWALK. THE ELECTRIC CO. MUST COME OUT TO SITE AND RAISE AND SHIELD THE WIRES WHICH THE CRANE WILL BE WORKING CLOSE TO BEFORE THE TANKS CAN BE PUT INTO THE LOADING DOCK AREA OF THE BUILDING.
- E. OSC SPOKE WITH MR. SIRMARCO OF DELAWARE CONTAINER TO DETERMINE HOW THE DRUMS ON THE ROOF WERE GOING TO BE EMPTIED. MR. SIRMARCO STATED THAT THEY WILL BE BRINGING A TANK TRUCK AND RUN A HOSE UP TO THE ROOF TO PUMP THE CONTENTS OF THE DRUMS INTO THE TRUCK. HE ALSO STATED THAT SOMEONE WILL BE ON SITE NOV. 3 TO BEGIN WORK.

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON. THE OSC STILL HAS NOT RECEIVED A LETTER FROM DELAWARE CONTAINER AGREEING TO REMOVE FLAMMABLE LIQUIDS FROM VERNON'S SIDE OF THE BUILDING.
- B. ELECTRIC CO. TO BE ON SCENE 10/27/88 TO SHIELD THE WIRES THAT THE CRANE WILL BE WORKING AROUND IN ORDER TO GET THE PROCESS TANKS IN THE LOADING DOCK AREA OF THE BUILDING.
- C. THE PROCESS TANKS ARE TO GO INTO THE LOADING DOCK AREA OF THE BUILDING FRI. 10/28/88.
- D. DELAWARE CONTAINER TO BE ON SCENE NOV. 3 TO PUMP OUT THE CONTENTS OF THE DRUMS ON THE ROOF OF THE VISUAL PACKAGING CO.

100288

E. TENTATIVE SCHEDULE OF EVENTS ACCORDING TO GALSON RESEARCH

TUES., 10/25/88-DELIVERY OF THE REACTION VESSEL WHICH WILL TAKE A WEEK TO PLUMB AND A 48 HOUR TEST RUN WILL BE DONE WITH WATER

FRI., 11/4/88-GALSON WILL TAKE A THREE DAY BREAK BEFORE STARTING THE REACTION PROCESS

TUES., 11/8/88-BEGIN LOADING PCP CONTAMINATED CONTAINER CONTENTS INTO REACTION VESSEL WHICH WILL TAKE APPROX. A WEEK

MON., 11/14/88-BEGIN REACTION PROCESS WHICH WILL RUN 24 HOURS A DAY FOR APPROX. 10 DAYS

TUES., 11/22/88-WASTE DISPOSAL ANALYSIS WILL BE DONE FROM THE TREATED BATCH WASTE AND FINAL TRANSPORTATION AND DISPOSAL ARRANGEMENTS WILL BE MADE

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100289

To: ERD/DERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Tue 1-Nov-88 10:32 EST Sys 163
Subject: POLREP 72 FOR BELFIELD AVE. SITE
Mail Id: IFM-163-881101-094930253

POLREP 072
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; OCTOBER 31, 1988)

A. ESTIMATED COSTS TO DATE: COE 10/28/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$15.5K	55K
TAT	66.3K	100K
ERCS	646.5K	800K
EPA (INDIRECT)	36.5K	111K
TOTAL	764.8K	916K

TOTAL PROJECT CEILING \$1,326,000

B. OSC MAINTAINING CONTACT WITH RP VERNON AND MR. WOLFE
(PERSPECTIVE BUYER OF THE BUILDING).

C. GALSON RESEARCH DOING PAPERWORK OFFSITE 10/27/88.

D. THE SITE IS TEMPORARILY DEMOED UNTIL CONTRACT
NEGOTIATIONS CAN BE SETTLED BETWEEN ERCS AND GALSON.
ALSO, UPON LEARNING OF SEVERAL RECENT DEVELOPMENTS IN
THE AREA OF WASTE INCINERATION THE OSC HAS DECIDED TO
DEDICATE THE NEXT SEVERAL DAYS TO RESEARCHING MORE
ECONOMICAL METHODS TO DEAL WITH THE PCP CONTAMINATED
MATERIALS.

II. ACTIONS TAKEN

A. THE OSC MET WITH BOB FANNING, ERCS PROGRAM DIRECTOR, AND
TOM O'HARA, ERCS DISPOSAL COORDINATOR, ON 10/27/88 TO
DISCUSS THE SUBCONTRACTOR'S WORK (GALSON RESEARCH) COMPLETED
TO DATE AS WELL AS PHASE III OF THE PROCESS STILL TO BE
PERFORMED. AFTER DISCUSSING THE LAY OUT OF PHASE III
WITH EPA ASSISTANT BRANCH CHIEF CARNEY, THE OSC HAS
DECIDED THAT THE PROJECT BE PUT ON HOLD UNTIL CONTRACT
ISSUES WITH GALSON CAN BE RESOLVED AND WE CAN DETERMINE
THAT THE ON-SITE TREATMENT PROCESS IS STILL THE BEST OPTION
TO PURSUE FOR COMPLETING THE REMOVAL OPERATIONS.
(RECENTLY, ERCS HAVE LEARNED THAT SEVERAL ENVIRONMENTAL
COMPANIES HAVE DEVELOPED THE NECESSARY TECHNOLOGY TO
INCINERATE PCP CONTAMINATED WASTE WITHOUT RELEASING DIOXIN.)

THE GALSON PROCESS IS VERY EXPENSIVE AND THERE ARE NO GUARANTEES THAT THE FIELD OPERATION WILL BE SUCCESSFUL, i.e. A SUCCESSFUL LAB SIMULATION ONLY INDICATES THAT THERE IS A VERY GOOD PROBABILITY THAT THE ACTUAL FIELD OPERATION WILL ALSO WORK.

- B. ELECTRIC CO. ON SCENE AT 1000 HOURS 10/27/88 TO RAISE AND SHIELD THE WIRES THAT CRANE WILL BE WORKING UNDER TO GET THE PROCESS TANKS IN THE LOADING DOCK AREA OF THE BUILDING.
- C. JOSEPH MARROW OF PHILA. WATER DEPT. INDUSTRIAL UNIT ON SCENE AT 1015 HOURS 10/28/88 TO INQUIRE ABOUT ANY RUNOFF WATER DISCHARGE INTO THE SANITARY SEWER.
- D. GALSON RESEARCH PLACED THE 7000 GAL. AND 800 GAL. PROCESS TANKS INSIDE THE LOADING DOCK AREA OF THE BUILDING 10/28/88.
- E. OSC SPOKE WITH DELAWARE CONTAINER REP. ON 10/28/88 WHO ASSURED OSC THAT THE DRUMS CONTAINING FLAMMABLE LIQUIDS (DOO1) WILL BE PUMPED INTO A TANKER AND MANIFESTED TO HIS FACILITY FOR INCINERATION ON THURS. NOV. 3.
- F. OSC SPOKE WITH ERCS PROGRAM DIRECTOR, BOB PANNING, THIS DATE (10/31/88) WHO STATED THAT HE WOULD LIKE ERCS TO WORK ALONG WITH TAT ON THE BULKING SCHEME FOR THE DRUMS ON VERNON'S SIDE OF THE BUILDING. THESE ARE ALL NON-PCP CONTAMINATED CONTAINERS WHICH WILL BE BULKED FOR DISPOSAL.
- G. ON 10/31/88 OSC TASKED TAT TO GATHER BACKGROUND INFORMATION ON ALTERNATIVE METHODS OF DISPOSAL AND THE PROGRESS MADE TO DATE BY OTHER ENVIRONMENTAL COMPANIES WHO HAVE PROCESSES TO INCINERATE PCP CONTAMINATED LIQUID AND SLUDGE.

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.
- B. DELAWARE CONTAINER TO BE ON SCENE NOV. 3 TO PUMP OUT THE CONTENTS OF THE FLAMMABLE DRUMS ON THE ROOF OF THE VISUAL PACKAGING CO. FOR THE RECORD, RP VERNON IS THE GENERATOR AND WILL SIGN THE MANIFEST AS THE GENERATOR FOR THESE WASTES TO BE TRANSPORTED OFF SITE. TAT TO BE ON SCENE NOV. 3 TO MONITOR AND DOCUMENT RP ACTIVITY.
- C. ERCS PROGRAM DIRECTOR WILL REVIEW THE CONTRACT WITH GALSON AND ATTEMPT TO CLARIFY/ELIMINATE ALL ASSUMPTIONS AND/OR UNKNOWNNS WHICH COULD FREE GALSON OF THEIR COMMITMENT TO PRODUCE A GOOD WORK PRODUCT SHOULD THE OSC DECIDE THAT PHASE III WILL CONTINUE.

100291

- D. TAT AND ERCS TO GATHER INFORMATION ON ALTERNATIVE TECHNOLOGIES FOR PCP CONTAMINATED WASTE DISPOSAL. A MEETING WILL BE HELD ON FRI., NOV. 4 BETWEEN ERCS, TAT AND EPA TO DISCUSS AND REVIEW THE INFORMATION AND MAKE A DECISION ON HOW TO BEST PROCEED WITH THE HANDLING OF THE PCP CONTAMINATED MATERIALS.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100292

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)

To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Tue 1-Nov-88 10:32 EST Sys
163 (118)
Subject: POLREP 72 FOR BELFIELD AVE. SITE
Mail Id: IPM-163-881101-094930253

POLREP #72
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; OCTOBER 31, 1988)

A. ESTIMATED COSTS TO DATE: COB 10/28/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$15.5K	55K
TAT	66.3K	100K
ERCS	646.5K	800K
EPA (INDIRECT)	36.5K	111K
TOTAL	764.8K	916K
TOTAL PROJECT CEILING \$1,326,000		

B. OSC MAINTAINING CONTACT WITH RP VERNON AND MR. WOLFE
(PERSPECTIVE BUYER OF THE BUILDING),

C. GALSON RESEARCH DOING PAPERWORK OFFSITE 10/27/88.

D. THE SITE IS TEMPORARILY DEMOBED UNTIL CONTRACT NEGOTIATIONS CAN BE SETTLED BETWEEN ERCS AND GALSON. ALSO, UPON LEARNING OF SEVERAL RECENT DEVELOPMENTS IN THE AREA OF WASTE INCINERATION THE OSC HAS DECIDED TO DEDICATE THE NEXT SEVERAL DAYS TO RESEARCHING MORE ECONOMICAL METHODS TO DEAL WITH THE PCP CONTAMINATED MATERIALS.

II. ACTIONS TAKEN

A. THE OSC MET WITH BOB PANNING, ERCS PROGRAM DIRECTOR, AND TOM O'HARA, ERCS DISPOSAL COORDINATOR, ON 10/27/88 TO DISCUSS THE SUBCONTRACTOR'S WORK (GALSON RESEARCH) COMPLETED TO DATE AS WELL AS PHASE III OF THE PROCESS STILL TO BE PERFORMED. AFTER DISCUSSING THE LAYOUT OF PHASE III WITH EPA ASSISTANT BRANCH CHIEF CARNEY, THE OSC HAS DECIDED THAT THE PROJECT BE PUT ON HOLD UNTIL CONTRACT ISSUES WITH GALSON CAN BE RESOLVED AND WE CAN DETERMINE THAT THE ON-SITE TREATMENT PROCESS IS STILL THE BEST OPTION TO PURSUE FOR COMPLETING THE REMOVAL OPERATIONS. (RECENTLY, ERCS HAVE LEARNED THAT SEVERAL ENVIRONMENTAL COMPANIES HAVE DEVELOPED THE NECESSARY TECHNOLOGY TO INCINERATE PCP CONTAMINATED WASTE WITHOUT RELEASING DIOXIN.) THE GALSON PROCESS IS VERY EXPENSIVE AND THERE ARE NO GUARANTEES THAT THE FIELD OPERATION WILL BE SUCCESSFUL, i.e. A SUCCESSFUL LAB SIMULATION ONLY INDICATES THAT THERE IS A VERY GOOD PROBABILITY THAT THE ACTUAL FIELD OPERATION WILL ALSO WORK.

100293

B. ELECTRIC CO. ON SCENE AT 1000 HOURS 10/27/88 TO RAISE AND SHIELD THE WIRES THAT CRANE WILL BE WORKING UNDER TO GET THE PROCESS TANKS IN THE LOADING DOCK AREA OF THE BUILDING.

- C. JOSEPH MARROW OF PHILA. WATER DEPT. INDUSTRIAL UNIT ON SCENE AT 1015 HOURS 10/28/88 TO INQUIRE ABOUT ANY RUNOFF WATER DISCHARGE INTO THE SANITARY SEWER.
- D. GALSON RESEARCH PLACED THE 7000 GAL. AND 800 GAL. PROCESS TANKS INSIDE THE LOADING DOCK AREA OF THE BUILDING 10/28/88.
- E. OSC SPOKE WITH DELAWARE CONTAINER REP. ON 10/28/88 WHO ASSURED THE OSC THAT THE DRUMS CONTAINING FLAMMABLE LIQUIDS (DOO1) WILL BE PUMPED INTO A TANKER AND MANIFESTED TO HIS FACILITY FOR INCINERATION ON THURS. NOV. 3.
- F. OSC SPOKE WITH ERCS PROGRAM DIRECTOR, BOB PANNING, THIS DATE (10/31/88) WHO STATED THAT HE WOULD LIKE ERCS TO WORK ALONG WITH TAT ON THE BULKING SCHEME FOR THE DRUMS ON VERNON'S SIDE OF THE BUILDING. THESE ARE ALL NON-PCP CONTAMINATED CONTAINERS WHICH WILL BE BULKED FOR DISPOSAL.
- G. ON 10/31/88 OSC TASKED TAT TO GATHER BACKGROUND INFORMATION ON ALTERNATIVE METHODS OF DISPOSAL AND THE PROGRESS MADE TO DATE BY OTHER ENVIRONMENTAL COMPANIES WHO HAVE PROCESSES TO INCINERATE PCP CONTAMINATED LIQUID AND SLUDGE.

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.
- B. DELAWARE CONTAINER TO BE ON SCENE NOV. 3 TO PUMP OUT THE CONTENTS OF THE FLAMMABLE DRUMS ON THE ROOF OF THE VISUAL PACKAGING CO. FOR THE RECORD, RP VERNON IS THE GENERATOR AND WILL SIGN THE MANIFEST AS THE GENERATOR FOR THESE WASTES TO BE TRANSPORTED OFF SITE. TAT TO BE ON SCENE NOV. 3 TO MONITOR AND DOCUMENT RP ACTIVITY.
- C. ERCS PROGRAM DIRECTOR WILL REVIEW THE CONTRACT WITH GALSON AND ATTEMPT TO CLARIFY/ELIMINATE ALL ASSUMPTIONS AND/OR UNKNOWNNS WHICH COULD FREE GALSON OF THEIR COMMITMENT TO PRODUCE A GOOD WORK PRODUCT SHOULD THE OSC DECIDE THAT PHASE III WILL CONTINUE.
- D. TAT AND ERCS TO GATHER INFORMATION ON ALTERNATIVE TECHNOLOGIES FOR PCP CONTAMINATED WASTE DISPOSAL. A MEETING WILL BE HELD ON FRI., NOV. 4 BETWEEN ERCS, TAT AND EPA TO DISCUSS AND REVIEW THE INFORMATION AND MAKE A DECISION ON HOW TO BEST PROCEED WITH THE HANDLING OF THE PCP CONTAMINATED MATERIALS.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100294

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Fri 4-Nov-88 15:39 EST Sys
163 (125)
Subject: POLREP 73 FOR BELFIELD AVE. SITE
Mail Id: IPM-163-881104-140890498

POLREP #73
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; NOVEMBER 3, 1988)

A. ESTIMATED COSTS TO DATE: COB 11/3/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$16.5K	55K
TAT	68.3K	100K
ERCS	646.5K	800K
EPA (INDIRECT)	37.9K	111K
TOTAL	769.2K	916K
TOTAL PROJECT CEILING \$1,326,000		

B. OSC MAINTAINING CONTACT WITH RP VERNON AND MR. WOLFE
(PERSPECTIVE BUYER OF THE BUILDING);

C. THE SITE IS TEMPORARILY DEMOBED UNTIL CONTRACT NEGOTIATIONS CAN
BE SETTLED BETWEEN ERCS AND GALSON. ALSO, UPON LEARNING OF
SEVERAL RECENT DEVELOPMENTS IN THE AREA OF WASTE INCINERATION THE
OSC HAS DECIDED TO DEDICATE THE NEXT SEVERAL DAYS TO RESEARCHING
MORE ECONOMICAL METHODS TO DEAL WITH THE PCP CONTAMINATED
MATERIALS.

II. ACTIONS TAKEN

A. RP VERNON ARRIVES ON SCENE AT 0930 HOURS AND DELAWARE CONTAINER
AT 1030 HOURS THIS DATE. THE RP BEGAN PUMPING OUT DRUMS OF
FLAMMABLE WASTE LIQUIDS (D001) FROM THE FIRST FLOOR OF VISUAL
PACKAGING AT APPROX. 1115 HOURS. A LIST OF THE DRUMS THAT WERE
TO BE PUMPED WAS NEVER GIVEN TO THE OSC, ALONG WITH A BULKING
SCHEME AND A WORK ORDER FROM DELAWARE CONTAINER. THE OSC
INFORMED VERNON OF THE PROPER LEVEL OF PROTECTION HE SHOULD BE
USING AND OF THE FIRE AND EXPLOSION THREAT BUT THE RP CONTINUED
TO WORK WITHOUT ANY PROTECTIVE CLOTHING.

B. AT 1215 THE RP BEGAN PUMPING THE CONTENTS OF THE DRUMS ON THE
ROOF WITH THE HOSE POSITIONED ACROSS A PUBLIC WALKWAY NEAR THE
TRAIN STATION. TAT ADVISED THE OSC OF THE TRIP AND SPILL HAZARDS
AND WERE INFORMED BY THE OSC THAT ALL REMOVAL SUPPORT PERSONNEL
STAY CLEAR OF THE RP WORK AREA. A VERY STRONG ORGANIC ODOR WAS
NOTICEABLE AS DISTANT AS 200 FT. DOWNWIND OF THE OPERATION. THE
RP PERFORMED NO AIR MONITORING DURING THE TRANSFER OF THE
FLAMMABLE LIQUIDS.

100295

C. THE OSC CONTACTED EPA RCRA OFFICE TO VERIFY DELAWARE CONTAINER'S
CURRENT COMPLIANCE STATUS. THE OSC LEARNED THAT THE FACILITY IS
IN COMPLIANCE AND HAS THE PROPER PERMITS TO TRANSPORT AND RECYCLE
THE FLAMMABLE MATERIAL.

- D. THE OSC SPOKE WITH KEN SIRMARCO OF DELAWARE CONTAINER AT 1230 HOURS TO FIND OUT WHAT VERNON'S COMPOSITE SAMPLE WAS ANALYZED FOR. IT WAS TESTED FOR METHANOL, MINERAL SPIRITS, ALCOHOL, AND SOLVENT CONTENT. IT WAS FOUND TO BE 129,000 BTUS, A FLASH POINT OF 80F, 0.18% CHLORINE CONTENT, AND 0.83 SPECIFIC GRAVITY. VERNON SUBMITTED TO DELAWARE CONTAINER 3 MSDS SHEETS WITH A COMPOSITE SAMPLE AND WASTE PROFILE SHEET, WHICH INCLUDED AN EPA ID# OBTAINED FROM THE STATE OF PA. THE OSC REQUESTED THAT A COPY OF THE ANALYTICAL RESULTS BE SENT TO HIM ASAP.
- E. THE DRUM PUMPING PROCESS WAS COMPLETED AT 1300 HOURS WITH A TOTAL OF APPROX. 1300 GAL. TAKEN OFF SITE BY DELAWARE CONTAINER TO BE RECYCLED AS FUEL PRODUCTS.
- F. AT THE OSC'S REQUEST EPA ENFORCEMENT, STEUTEVILLE, VISITED THE SITE AT 1310 HOURS. HE WALKED THROUGH THE BUILDING WITH THE OSC AND MR. VERNON AND REQUESTED THAT THE REMAINING CONTAINERS SHOULD ALSO BE REMOVED FROM THE VISUAL PACKAGING SIDE OF THE BUILDING. THE RP WAS GIVEN BY THE OSC UNTIL WED. 11/9/88 TO APPROPRIATELY REMOVE ANY OR ALL CONTAINERS IN ACCORDANCE WITH THE CERCLA 106 ORDER. ALL CONTAINERS WHICH REMAIN AS OF 11/9/88 WILL BE BULKED AND SAMPLED FOR DISPOSAL BY EPA REMOVAL PROJECT PERSONNEL.
- G. OSC SPOKE WITH ROBERT PETERSON, PRESIDENT AND TECHNICAL DIRECTOR OF GALSON, THIS DATE. THE OSC EXPRESSED TO PETERSON HIS CONCERN FOR THE SUBCONTRACTORS WORK COMPLETED TO DATE AND DISCUSSED THE CONTROLS AND GUARANTEES WHICH EPA SHOULD HAVE IN WRITING PRIOR TO ANY CONTINUANCE OF PHASE III OPERATIONS. PETERSON TO MEET WITH ERCS PROGRAM MANAGER NEXT WEEK AND REPACKAGE THE WORK WHICH REMAINS TO BE DONE IN ACCORDANCE WITH THE OSC'S REQUEST.

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.
- B. ERCS PROGRAM DIRECTOR WILL REVIEW THE CONTRACT WITH GALSON AND ATTEMPT TO CLARIFY/ELIMINATE ALL ASSUMPTIONS AND/OR UNKNOWNNS WHICH COULD FREE GALSON OF THEIR COMMITMENT TO PRODUCE A GOOD WORK PRODUCT SHOULD THE OSC DECIDE THAT PHASE III WILL CONTINUE.
- C. TAT AND ERCS TO GATHER INFORMATION ON ALTERNATIVE TECHNOLOGIES FOR PCP CONTAMINATED WASTE DISPOSAL. A MEETING WILL BE HELD ON FRI., NOV. 4 BETWEEN ERCS, TAT AND EPA TO DISCUSS AND REVIEW THE INFORMATION AND MAKE A DECISION ON HOW TO BEST PROCEED WITH THE HANDLING OF THE PCP CONTAMINATED MATERIALS.
- D. RP VERNON MUST COMPLETE HIS REMOVAL OPERATIONS AT THE SITE BY WED., NOV. 9, 1988.
- E. TAT AND ERCS TO COMPLETE BULKING SCHEME OF CONTAINERS ON VISUAL PACKAGING SIDE OF BUILDING AND BEGIN BULKING THE CONTENTS BY WED., NOV. 9, 1988.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100296

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Wed 9-Nov-88 16:30 EST
Sys 163 (86)
Subject: polrep 74 for belfield ave. site
Mail Id: IPM-163-881109-148590069

POLREP #74
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; NOVEMBER 9, 1988)

A. ESTIMATED COSTS TO DATE: COB 11/9/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$16.5K	55K
TAT	69.1K	100K
ERCS	646.5K	800K
EPA (INDIRECT)	37.9K	111K
TOTAL	770.0K	916K
TOTAL PROJECT CEILING \$1,326,000		

B. OSC MAINTAINING CONTACT WITH RP VERNON AND MR. WOLFE
(PERSPECTIVE BUYER OF THE BUILDING).

II. ACTIONS TAKEN

A. TAT CONTACTED BOB PETERSON OF GALSON TO OBTAIN UPDATED
INFORMATION AND APPROXIMATE TIME SCHEDULE FOR PCP, PHASE
III WORK, SHOULD IT CONTINUE.

- 2 WEEKS SET UP/TESTING
- 1 WEEK LOADING OF PCP DRUMS
- 2 WEEKS RUNNING OPERATIONS/PAPER WORK
- 1 WEEK DECONTAMINATION OF CONTAINERS/TANKS

APPROXIMATELY 5-6000 GAL. OF PUMPABLE SLUDGE PRODUCED
AS FINAL PRODUCT. APPROXIMATELY 1-2000 GAL. WASH WATER
PRODUCED WHICH MAY BE TREATABLE BY CARBON FILTER
SYSTEM.

B. CAPT. MCALEER AND LT. TOM BRENNEN OF THE HAZ. MAT. TEAM
OF THE PHILA. FIRE DEPT. WERE ON SCENE 11/7/88. THE CAPT.
TELEPHONED OSC YOUNIS EXPRESSING CONCERN ABOUT THE PROJECT
BEING ON HOLD. DUE TO THE TWO FIRES AND SEVERAL INCIDENTS
OF BREAKING AND ENTERING WHICH OCCURRED IN THE PAST 14
MONTHS, HE EXPRESSED CONCERN THAT A THIRD FIRE COULD CAUSE
A MAJOR DIOXIN RELEASE.

100297

C. TAT CONTACTED SEVERAL DIOXIN FACILITIES, EPA RESEARCH AND DEVELOPMENT, CINN. HAZARDOUS WASTE ENGINEERING RESEARCH LAB, LIQUID INCINERATION AND ROTARY KILN, RCRA HOTLINE, ERT, PAUL DESROSIER OF EPA AND OSC'S FROM OTHER REGIONS. AS OF THIS DATE OSC RECOMMENDS CONTINUATION OF THE PROJECT WITH GALSON PENDING CONTRACT NEGOTIATIONS BETWEEN ERCS AND GALSON.

D. BULKING SCHEME OF THE DRUMS ON THE VISUAL PACKAGING SIDE OF THE BUILDING WAS COMPLETED FRI. 11/4/88 BY ERCS AND TAT. THE SMALL SCALE BULKING IS BEING DONE AT QC LAB, INC., ERCS WILL THEN BULK ON SITE AND SET UP DISPOSAL FACILITIES WHEN THE SMALL SCALE BULKING IS COMPLETED.

III. FUTURE PLANS

A. OSC TO CONTINUE WORKING WITH RP VERNON FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.

B. ERCS PROGRAM DIRECTOR WILL REVIEW THE CONTRACT WITH GALSON AND ATTEMPT TO CLARIFY/ELIMINATE ALL ASSUMPTIONS AND/OR UNKNOWNNS WHICH COULD FREE GALSON OF THEIR COMMITMENT TO PRODUCE A GOOD WORK PRODUCT SHOULD THE OSC DECIDE THAT PHASE III WILL CONTINUE.

C. GALSON RESEARCH TO BE ON SITE AND CONTINUE PHASE III OF THE ON-SITE TREATMENT OF PCP PENDING DIOXIN ANALYSIS OF THE PCP CONTAMINATED DRUMS.

D. ERCS TO BULK CONTENTS OF THE CONTAINERS ON THE VISUAL PACKAGING SIDE OF THE BUILDING AS SOON AS THE SMALL SCALE BULKING IS COMPLETED IN QC LAB, INC.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

To: ERD/OERR (EPA5511)
 To: REGION03.TAT (EPA9322)
 To: P.YOUNIS (EPA9347)
 To: RRC (EPA9374)
 From: RRC (EPA9374) Delivered: Wed 23-Nov-88 10:33 EST Sys 163
 (130)
 Subject: polrep 75 for belfield ave. site
 Mail Id: IFM-163-881123-094981255

POLREP #75
 BELFIELD AVENUE SITE
 PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; NOVEMBER 21, 1988)

A. ESTIMATED COSTS TO DATE: COB 11/21/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$17.1K	55K
TAT	71.4K	100K
ERCS	646.5K	800K
EPA (INDIRECT)	38.9K	111K
TOTAL	773.9K	1066K
TOTAL PROJECT CEILING \$1,326,000		

II. ACTIONS TAKEN

- A. ERCS PROGRAM DIRECTOR (PANNING) RECEIVED THE REQUESTED PROPOSAL FORM MR. PETERSON OF GALSON RESEARCH. THIS PROPOSAL OUTLINES ALL REMAINING TASKS AND ASSOCIATED COSTS TO PERFORM AND COMPLETE THE ON-SITE TREATMENT PROCESS. PANNING CONTACTED OSC YOUNIS ON 11/18/88 TO REQUEST A MEETING TO REVIEW THE GALSON PROPOSAL AND MAKE A DECISION ON THE PROCESS.
- B. OSC YOUNIS, TAT MULLICAN, AND ERCS PROGRAM MANAGER ROBERT PANNING, MET ON 11/20/88 TO DISCUSS CONTRACTUAL AGREEMENTS BETWEEN GALSON RESEARCH AND OH MATERIALS.
- C. BASED ON THE FOLLOWING INCONSISTENCIES WITH THE GALSON PROPOSAL FOR WORK TO BE PERFORMED, OSC YOUNIS HAS DECIDED NOT TO CONTINUE THE PCP DECHLORINATION PROCESS PROPOSED BY GALSON RESEARCH CORP. (GRC):
 - i) GRC HAS REQUESTED ADDITIONAL SAMPLING/ANALYTICAL TO GUARANTEE THAT REPRESENTATIVE SAMPLES ARE AVAILABLE FOR THE LAB SIMULATION. ADDITIONALLY, GRC WOULD LIKE TO WEIGH EACH OF THE 179 CONTAINERS ON SITE TO DETERMINE ACCURATE WEIGHTS (ASSOCIATED ADDITIONAL COST OF \$10,375).
 - ii) GRC HAS REQUESTED THAT A NEW LABORATORY COMPOSITE OF THE WASTES BE COLLECTED TO PERFORM A SECOND LABORATORY SIMULATION (ASSOCIATED COST OF \$10,000).
 - iii) GRC HAS REQUESTED THAT ELECTRICAL EXPENSE NOT BE INCLUDED IN THE ON-SITE TREATMENT TASK (ASSOCIATED COST OF \$61,850).
 - iv) GRC HAS REQUESTED THAT THE RENTAL OF ON-SITE EQUIPMENT AND THE WEATHER PROOFING OF THE WORK AREA BE ADDRESSED AS A "NEW" SEPARATE EXPENSE (ASSOCIATED ADDITIONAL 100299 \$36,800).
 - v) GRC HAS REQUESTED THAT EPA PAY FOR THE DEMOBILIZATION/DECONTAMINATION OF EQUIPMENT AS A SEPARATE TASK/EXPENSE

- vii) GRC DOES NOT GUARANTEE A MAXIMUM VOLUME OF "TREATED WASTE" FOLLOWING PROCESSING, NOR DO THEY GUARANTEE THAT THE RESULTING MATERIAL WILL BE ACCEPTABLE FOR TRANSPORTATION OR DISPOSAL TO AN EPA APPROVED FACILITY. INITIALLY, GRC HAD PROPOSED TO MAKE ALL THE NECESSARY TSD ARRANGEMENTS FOR THE RESULTING WASTE MATERIAL.
 - viii) AS A RESULT OF GRC'S INITIAL LAB SIMULATION (COMPLETED 11/7/88) THEY HAVE DETERMINED THAT THERE IS STILL A GOOD "PROBABILITY" FOR SUCCESS, BUT THE REACTION PROCESS WILL REQUIRE INCREASED REAGENT, MIXTURE TIME AND HEATING. THEY ALSO HAVE DETERMINED THAT THE RESULTING MATERIAL WILL HAVE A VERY HIGH MELTING POINT AND WOULD THEREFORE HAVE TO BE HEATED FROM PROCESSING TO INCINERATION. THE RESULTING MATERIAL MAY ALSO CONTAIN HIGH CONCENTRATIONS OF METALS OR DIOXIN WHICH WOULD ELIMINATE ANY POSSIBILITY FOR OFF-SITE DISPOSAL.
 - ix) ADDITIONAL COSTS FOR OHM SUPPORT DURING THE ON-SITE PROCESSING WOULD AMOUNT TO APPROXIMATELY \$100-\$150K.
- AS OUTLINED ABOVE, IT DOES NOT APPEAR PRUDENT (BASED ON THE ESTIMATED ADDITIONAL COSTS) TO PROCEED WITH THE GRC RESEARCH PROCESS WHEN THERE ARE NO GUARANTEES OR PROVEN "TRACK RECORD" FOR SUCCESSFUL RESULTS. AFTER DISCUSSING THE PROPOSAL WITH ASST. BRANCH CHIEF CARNEY AND SECTION CHIEF JARVELA, THE OSC HAS DECIDED TO DISCONTINUE THE ON-SITE TREATMENT EFFORT. THE PCP MATERIAL WILL BE SECURED IN A FIRE-PROOF VAULT ON THE SITE UNTIL A MORE EFFECTIVE DISPOSAL OPTION IS AVAILABLE.

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON AND ENFORCEMENT STEUTEVILLE FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.
- B. ERCS PROGRAM DIRECTOR WILL CONTACT GALSON AND INFORM THEM THAT THE EPA HAS ELECTED NOT TO CONTINUE WITH THE TREATMENT PROCESS AND WOULD LIKE FOR GALSON TO BEGIN PREPARATION FOR SITE TEAR-DOWN AND DEMOBILIZATION.
- C. ERCS TO BULK CONTENTS OF THE CONTAINERS ON THE VISUAL PACKAGING SIDE OF THE BUILDING (NON-PCP WASTE) AS SOON AS THE SMALL SCALE BULKING IS COMPLETED IN QC LAB, INC. WASTE ANALYSIS FOR THE BULKED WASTE STREAMS WILL BE AVAILABLE BY 12/2/88. AT THAT TIME, DISPOSAL PROFILES WILL BE COMPLETED AND SUBMITTED TO TSD FACILITIES FOR APPROVAL. NON-PCP WASTE SHOULD BE REMOVED FROM THE SITE BY 1/30/88.
- D. OSC WILL INSTRUCT ERCS TO BEGIN TEAR-DOWN/DEMOBILIZATION OF GALSON'S ON-SITE TREATMENT SET-UP ON 11/28/88. ERCS WILL ALSO HAVE A STRUCTURAL ENGINEER ON SITE THE WEEK OF 11/28/88 TO DESIGN AND APPROVE A LOCATION WITHIN THE BUILDING FOR FIRE-PROOF STORAGE OF THE SECURED PCP MATERIAL. OSC WILL COORDINATE THIS ACTIVITY WITH THE PHILA. FIRE DEPT. AND RP VERNON.
- E. OSC WILL CONTINUE TO SEARCH FOR ALTERNATIVE TREATMENT TECHNOLOGIES FOR NEUTRALIZATION OF THE PCP CONTAMINATED WASTE.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100300

POLREP #76
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; NOVEMBER 28, 1988)

A. ESTIMATED COSTS TO DATE: COB 11/28/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$17.4K	55K
TAT	71.7K	100K
ERCS	646.5K	800K
EPA (INDIRECT)	39.3K	111K
TOTAL	774.9K	1066K
TOTAL PROJECT CEILING \$1,326,000		

II. ACTIONS TAKEN

- A. A MEETING WAS HELD THIS DATE ON SITE AT 1330 HOURS. THOSE IN ATTENDANCE WERE: OSC YOUNIS, TATM MORRIS, MR. SHULL OF S.T. HUDSON ENGINEERS, INC., BATTALION CHIEF JANDA OF THE PHILA. HAZ. MAT. TEAM, RESPONSE MANAGER FRED PARKER OF OHM.
- B. A SITE TOUR WAS CONDUCTED AT 1400 HOURS AS THE OSC UPDATED EVERYONE ON THE MOST RECENT DECISIONS MADE. THE BATTALION CHIEF SUGGESTED THAT SOME OF THE PCP CONTAINERS IN POOR CONDITION BE OVERPACKED BEFORE BEING PLACED IN VAULT STORAGE. THE STRUCTURAL ENGINEER FEELS THAT THE FLAMMABLE CELL ALREADY ON SITE CAN BE USED AS THE STORAGE CELL FOR THE PCP CONTAMINATED WASTE WITH A FEW MINOR ADJUSTMENTS. THE BATTALION CHIEF WAS CONCERNED ABOUT THE PCP WASTE BEING LEFT ON SITE BUT FULLY UNDERSTANDS WHY THE EPA MUST PERSUE THIS OPTION.
- C. A LIST OF NON-PCP DRUMS LOCATED IN THE DRUM STAGING AREA WAS SUBMITTED TO OH MATERIALS SO THAT THE ANALYTICAL COULD BE RESEARCHED AND THESE DRUMS BULKED WITH THE CONTAINERS ON THE VISUAL PACKAGING SIDE OF THE BUILDING.
- D. OSC CONTACTED RP VERNON THIS DATE TO INFORM HIM THAT EPA IS NOT CONTINUING WITH THE ON-SITE TREATMENT PROCESS, THE PCP CONTAMINATED CONTAINERS WILL BE STORED ON SITE IN A VAULT, AND THE NON-PCP CONTAMINATED CONTAINERS WILL BE REMOVED WITHIN 6 TO 8 WEEKS.
- E. HAL YATES, OPA, WAS ASSIGNED TO THIS SITE DUE TO RAY GERMANN'S ABSENCE. OSC YOUNIS UPDATED YATES ON ALL SITE ACTIVITIES.

100301

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON AND ENFORCEMENT STEUTEVILLE FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.
- B. A MEETING WILL BE HELD ON WED. 11/30/88 BETWEEN OSC YOUNIS, TAT, RM PARKER, AND THE ERCS DISPOSAL COORDINATOR FOR OH MATERIALS. THE SCOPE OF WORK FOR THE BULKING AND DISPOSAL OF NON-PCP WASTES, DEMOBILIZATION OF GALSON'S EQUIPMENT, AND THE STORAGE OF PCP WASTE WILL BE OUTLINED AND AGREED UPON.
- C. ERCS TO BEGIN WORK ON SITE BY THURS. 12/1/88 TO PERFORM THE ABOVE MENTIONED TASKS.
- D. MR. SHULL OF S.T. HUDSON ENGINEERS, INC. WILL CONTACT ERCS BY WED. 11/30/88 WITH A DECISION AS TO WHETHER A VAULT NEEDS TO BE CONSTRUCTED OR IF THE PCP WASTE CAN BE STORED IN THE FLAMMABLE CELL ALREADY ON SITE.
- E. OSC WILL CONTINUE TO SEARCH FOR ALTERNATIVE TREATMENT TECHNOLOGIES FOR NEUTRALIZATION OF THE PCP CONTAMINATED WASTE.
- F. A MEETING WILL BE HELD ON SITE THURS., 12/1/88 at 1400 HOURS BETWEEN ERCS PROGRAM MANAGER, FANNING, AND GALSON RESEARCH REPS. CONCERNING THE DEMOBILIZATION OF GALSON'S EQUIPMENT. ERCS WILL BEGIN THE DEMOBILIZATION OF THE GENERATORS ON SITE ON THURS., 12/1/88 ALSO.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100302

To: ERD/OERR (EPA5511)
 To: REGION03.TAT (EPA9322)
 To: P.YOUNIS (EPA9347)
 To: RRC (EPA9374)
 From: RRC (EPA9374) Delivered: Fri 2-Dec-88 13:34 EST Sys
 163 (81)
 Subject: POLREP 77 FOR BELFIELD AVE. SITE
 Mail Id: IPM-163-881202-122250063

POLREP #77
 BELFIELD AVENUE SITE
 PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JAVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; DECEMBER 2, 1988)

A. ESTIMATED COSTS TO DATE: COB 12/1/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$17.5K	55K
TAT	72.8K	100K
ERCS	648.5K	800K
EPA (INDIRECT)	39.6K	111K
TOTAL	778.4K	1066K
TOTAL PROJECT CEILING \$1,326,000		

B. PERSONNEL ON SCENE

	12/1/88	12/2/88
EPA	1	1
TAT	2	2
ERCS	5	4
GALSON	2	0

II. ACTIONS TAKEN

- A. A MEETING WAS HELD ON SITE THURS., 12/1/88, AT 1430 HOURS BETWEEN ERCS PROGRAM MANAGER, PANNING, AND GALSON RESEARCH'S PRESIDENT CONCERNING THE DEMOBILIZATION OF GALSON'S EQUIPMENT. IT WAS DECIDED THAT ERCS WOULD DEMOBILIZE GALSON'S EQUIPMENT DURING THE WEEK OF 12/5/88.
- B. ERCS RM AND TWO RT'S ON SCENE THURS., 12/1/88, TO BEGIN ORGANIZATION OF CONTAINERS THAT WILL BE BULKED DURING WEEK OF 12/5/88.
- C. ERCS ELECTRICIAN ON SCENE THIS DATE, 12/2/88, TO DISCONNECT THE THREE GENERATORS WHICH WILL BE DEMOED ASAP.
- D. ERCS DELIVERED A LOAD OF 91-35 GAL. OVERPACK DRUMS THIS DATE TO BE USED DURING THE WEEK OF 12/5/88.
- E. ERCS CONTINUING TO PROVIDE SITE SECURITY FOR COMMAND POST AND OPERATIONS AREA.
- F. ERCS PREPPED SITE FOR FIELD OPERATIONS BEGINNING 12/5/88.
- G. OSC NOTIFIED PERSPECTIVE BUYER (A. WOLFE) THAT ALL PCP CONTAMINATED WASTE WOULD REMAIN ON-SITE IN A VAULT UNTIL A VIABLE ALTERNATIVE TREATMENT/DISPOSAL METHOD IS AVAILABLE.

100303

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON AND. ENFORCEMENT STEUTEVILLE FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.
- B. OSC WILL CONTINUE TO SEARCH FOR ALTERNATIVE TREATMENT TECHNOLOGIES FOR NEUTRALIZATION OF THE PCP CONTAMINATED WASTE.
- C. ERCS TO BEGIN OPERATIONS FOR TRANSPORTATION AND DISPOSAL OF NON-PCP MATERIALS AND DEMOBING GALSON RESEARCH'S EQUIPMENT MON., 12/5/88.
- D. OSC TO CONTINUE OFF-SITE ACTIVITY WITH R. VERNON (RP), PHILA. FIRE DEPT., AND PERSPECTIVE PURCHASER (A. WOLFE) OF THE BUILDING.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100304

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Wed 7-Dec-88 10:43 EST Sys
163 (79)
Subject: POLREP #78 BELFIELD AVE SITE
Mail Id: IPM-163-881207-096550370

POLREP #78
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; DECEMBER 5TH, 1988)

A. ESTIMATED COSTS TO DATE: COB 12/2/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$17.8K	55K
TAT	73.4K	100K
ERCS	676.7K	800K
EPA (INDIRECT)	40.6K	111K
TOTAL	808.5K	1066K

TOTAL PROJECT CEILING \$1,326,000

B. PERSONNEL ON SCENE 12/5/88

EPA	0
TAT	2
ERCS	13
GALSON	1

C. WEATHER: PARTLY CLOUDY AND COLD, TEMPERATURES RANGING FROM THE MID 30'S IN THE AM TO THE LOW 40'S IN THE AFTERNOON.

II. ACTIONS TAKEN

- A. ERCS MADE A DELIVERY OF 56 55-GALLON DRUMS ON SITE 12/3/88.
- B. ERCS SUPERVISORS AND CREW MOBED ON SITE THIS DATE TO BEGIN DEMOBILIZATION OF GALSON RESEARCH'S EQUIPMENT AND BEGIN STAGING THE DRUMS THAT WILL BE BULKED.
- C. ERCS MOBED A DECON TRAILER ON SITE AT 1330 HOURS THIS DATE.
- D. ERCS AND GALSON COMPLETED A PLAN FOR DISMANTLING AND DEMOBING GALSON RESEARCH'S EQUIPMENT.
- E. ERCS CONTINUING TO PROVIDE SITE SECURITY FOR COMMAND POST AND OPERATIONS AREA.
- F. OSC OFFSITE DUE TO OTHER REGIONAL COMMITMENTS. HOWEVER, HE HAS BEEN IN PHONE CONTACT SEVERAL TIMES THROUGHOUT THE DAY.
- G. ERCS MADE MINOR REPAIRS TO FLAMMABLE CELL ON SITE IN ORDER TO REPAIR IT FOR STORAGE OF THE PCP CONTAMINATED CONTAINERS. AS REQUESTED BY PHILA. FIRE DEPT CHIEF JANDA, ALL PCP CONTAINERS WILL BE OVERPACKED PRIOR TO PLACEMENT IN THE VAULT.

100305

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON AND ENFORCEMENT STEUTEVILLE FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.
- B. OSC WILL CONTINUE TO SEARCH FOR ALTERNATIVE TREATMENT TECHNOLOGIES FOR NEUTRALIZATION OF THE PCP CONTAMINATED WASTE.
- C. ERCS TO CONTINUE DEMOBING GALSON'S EQUIPMENT AND PREPARING DRUMS FOR DISPOSAL.
- D. OSC TO CONTINUE OFF-SITE ACTIVITY WITH R. VERNON (RP), PHILA. FIRE DEPT., AND PERSPECTIVE PURCHASER (A. WOLFE) OF THE BUILDING.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100306

To: ERD/GERE (EPA9311)
 To: REGION03.TAT (EPA9322)
 To: P.YOUNIS (EPA9347)
 To: ARC (EPA9374)
 From: ARC (EPA9374) Delivered: Wed 7-Dec-88 15:21 EST Sys 16
 Subject: POLREFIN? BELFIELD AVE. SITE
 Mail ID: IPM-163-881207-108240953

POLREF 479

BELFIELD AVENUE SITE

PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; DECEMBER 6TH, 1988)

A. ESTIMATED COSTS TO DATE: COB 12/5/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$17.2K	55K
TAT	74.1K	100K
ERCS	\$82.4K	300K
EPA (INDIRECT)	40.7K	111K
TOTAL	\$19.1K	1066K
TOTAL PROJECT CEILING \$1,326,000		

B. PERSONNEL ON SCENE 12/6/88

EPA	0
TAT	2
ERCS	12
GALSON	1

C. WEATHER: SUNNY AND COLD TEMPERATURES RANGING FROM HIGH 20'S IN THE AM, TO MID 50'S IN THE AFTERNOON.

II. ACTIONS TAKEN

- A. ERCS AND TAT WENT THROUGH BUILDING IN AN ATTEMPT TO BETTER IDENTIFY AND SEGREGATE DRUMS AND CONTAINERS FOR STAGING.
- B. ERCS BEGAN OVERPACKING DRUMS AND CONTAINERS ON THE FIRST FLOOR AND IN THE BASEMENT OF THE VISUAL PACKAGING BUILDING. THERE WERE NO READINGS ABOVE BACKGROUND OBTAINED ON THE HNU.
- C. DISMANTLING AND DEMOBING OF GALSON RESEARCH'S EQUIPMENT OFFICIALLY BEGAN THIS DATE. A REPRESENTATIVE OF GALSON RESEARCH WILL BE ON-SITE THROUGHOUT THIS OPERATION TO ASSIST OHM PERSONNEL.
- D. A TRANSITION AREA WAS SET UP WITHIN THE BUILDING BY ERCS FOR THE PURPOSE OF "DRESSING OUT" AND FOR STORAGE OF EQUIPMENT WITHIN A "SECURE" AREA.

100307

E. ERCS CONTINUING TO PROVIDE SITE SECURITY FOR COMMAND POST AND OPERATIONS AREA.

F. OSC OFFSITE DUE TO OTHER REGIONAL COMMITMENTS HOWEVER, HE HAS BEEN IN CONTACT VIA PHONE SEVERAL TIMES THROUGHOUT THE DAY.

G. CRANE MOVED ON SITE THIS DATE TO REMOVE GALSON'S 600 GAL. FUELLES TANK, 1 STEAM GENERATORS AND A RADIATOR FROM THE LOADING DOCK AREA. TRAFFIC WAS TEMPORARILY STOPPED ON BELFIELD AVE. FOR THIS PROCEDURE TO TAKE PLACE.

F. ERCS DELIVERED 40 55-GALLON OVERPACK DRUMS THIS DATE 12/6/88.

III. FUTURE PLANS

A. OSC TO CONTINUE WORKING WITH RP VERNON AND ENFORCEMENT STEUTEVILLE FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.

B. OSC WILL CONTINUE TO SEARCH FOR ALTERNATIVE TREATMENT TECHNOLOGIES FOR NEUTRALIZATION OF THE PCP CONTAMINATED WASTE.

C. ERCS TO CONTINUE DEMOBING GALSON'S EQUIPMENT AND PREPARING DRUMS FOR DISPOSAL.

D. OSC TO CONTINUE OFF-SITE ACTIVITY WITH R. VERNON (RP), PHILA. FIRE DEPT., AND PERSPECTIVE PURCHASER (A. WOLFE) OF THE BUILDING.

E. CRANE TO BE REMOVED ON 12/7/88 AT 7:00 PM FOR THE REMOVAL OF GALSON'S 7,000 GALLON TANK. PROCEDURE TO OCCUR AT THIS TIME DUE TO THE NEED TO CHANGE THE TRAFFIC PATTERNS ON BELFIELD AVE. TRAFFIC WILL BE HAULTED FOR APPROXIMATELY 3 HOURS.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100308

To: ERD/OERR (EPA5311)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Fri 9-Dec-88 10:15 EST Sys 16
Subject: POLREP# 80 BELFIELD AVE SITE
Mail ID: IFM-163-881209-092270870

FILE# 830

BELFIELD AVENUE SITE

PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; WEDNESDAY, DECEMBER 7TH, 1988)

A. ESTIMATED COSTS TO DATE: COR 12/6/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$18.0K	55K
TAT	74.9K	100K
ERCS	689.9K	800K
EPA (INDIRECT)	40.8K	111K
TOTAL	823.6K	1066K
TOTAL PROJECT CEILING \$1,326,000		

B. PERSONNEL ON SCENE 12/7/88

EPA	1
TAT	2
ERCS	15
GALSON	1

C. WEATHER: SUNNY AND COLD TEMPERATURES RANGING FROM MID 30'S IN THE AM, TO UPPER 50'S IN THE AFTERNOON.

II. ACTIONS TAKEN

- A. ERCS CONTINUE OVERPACKING CONTAINERS ON THE VISUAL PACKAGING SIDE OF THE BUILDING. OVERPACKING OF THE CONTAINERS LOCATED WITHIN THE DRUM STAGING AREA BEGAN THIS DATE 12/7/88. HNU READINGS WERE NOT ABOVE BACKGROUND. 72 TOTAL CONTAINERS HAVE BEEN OVERPACKED THIS DATE (BOTH PCP AND NON PCP CONTAMINATED).
- B. ERCS MOVED DEBRIS INSIDE OF BUILDING TO CLEAR AN AREA FOR THE STAGING OF NONCONTAMINATED PCP DRUMS AND CONTAINERS.
- C. A RAMP WAS BUILT BY ERCS TO AID IN THE REMOVAL OF GALSON'S RESEARCH EQUIPMENT.

100309

- D. OSC CONTACTS CHIEF JANDA OF THE PHILADELPHIA HAZ-MAT TEAM TO GIVE HIM AN UPDATE ON SITE ACTIVITIES; PAST, PRESENT, AND FUTURE.
- E. DISMANTLING AND DEMOBING OF GALSON RESEARCH'S EQUIPMENT CONTINUES THIS DATE. REMOVAL OF THE 7,000 GALLON TANK TOOK PLACE AT 1900 HOURS DUE TO THE NECESSITY TO STOP TRAFFIC ON BELFIELD AVE.
- F. ERCS CONTINUING TO PROVIDE SITE SECURITY FOR COMMAND POST AND OPERATIONS AREA.

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON AND ENFORCEMENT STEUTEVILLE FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.
- B. OSC WILL CONTINUE TO SEARCH FOR ALTERNATIVE TREATMENT TECHNOLOGIES FOR NEUTRALIZATION OF THE PCP CONTAMINATED WASTE.
- C. ERCS TO CONTINUE DEMOBING GALSON'S EQUIPMENT AND PREPARING DRUMS FOR DISPOSAL.
- D. OSC TO CONTINUE OFF-SITE ACTIVITY WITH R. VERNON (RP), PHILA. FIRE DEPT., AND PERSPECTIVE PURCHASER (A. WOLFE) OF THE BUILDING.
- E. CHIEF JANDA OF THE PHILADELPHIA HAZ-MAT TEAM AND OTHER HAZ-MAT OFFICIALS WILL BE ON SITE 12/9/88 TO VIEW SITE ACTIVITIES.
- F. ERCS TO CLEAN AND FILL DOCK AREA AND PLACE A SIDE RAIL UP ON 12/8/88.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100310

To: ERD/DEAR (EPA5511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Fri 7-Dec-88 10/19 EST Sys 1a
Subject: POLREP# 81 BELFIELD AVE SITE
Mail Id: IFM-163-881209-092890176

SEND A:POL81.BEL

POLREP #81
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION: (1800 HOURS; THURSDAY, DECEMBER 8TH, 1988)

A. ESTIMATED COSTS TO DATE: COB 12/7/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$18.1K	55K
TAT	76.9K	100K
ERCS	697.4K	800K
EPA (INDIRECT)	40.9K	111K
TOTAL	833.3K	1066K
TOTAL PROJECT CEILING \$1,326,000		

B. PERSONNEL ON SCENE 12/8/88

EPA	0
TAT	2
ERCS	11
GALSON	1

C. WEATHER: SUNNY AND COLD TEMPERATURES IN THE UPPER 20'S IN THE AM, TO MID 40'S IN THE AFTERNOON.

II. ACTIONS TAKEN

- A. ERCS CONTINUES OVERPACKING DRUMS AND CONTAINERS ON THE FIRST FLOOR AND IN THE BASEMENT OF THE VISUAL PACKAGING BUILDING. 83 DRUMS AND CONTAINERS OVERPACKED TODAY. TOTAL OVERPACKED TO DATE IS 155.
- B. ERCS CLEANED AND FILLED DOCK AREA, SIDE RAIL WAS PLACED TO AID IN SAFETY.
- C. 175 30-GALLON DRUMS AND 103 55-GALLON OVERPACKS WERE DELIVERED TO SITE THIS DATE.

100311

D. GALSON RESEARCH REPRESENTATIVE DUTIES COMPLETE THIS DATE 12/8/88.

E. ERCS CONTINUING TO PROVIDE SITE SECURITY FOR COMMAND POST AND OPERATIONS AREA.

III. FUTURE PLANS

A. OSC TO CONTINUE WORKING WITH RP VERNON AND ENFORCEMENT STATEVILLE FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.

B. OSC WILL CONTINUE TO SEARCH FOR ALTERNATIVE TREATMENT TECHNOLOGIES FOR NEUTRALIZATION OF THE PCP CONTAMINATED WASTE.

C. ERCS TO CONTINUE DEMOBING GALSON'S EQUIPMENT AND PREPARING DRUMS FOR DISPOSAL.

D. OSC TO CONTINUE OFF-SITE ACTIVITY WITH R. VERNON (RP), PHILA. FIRE DEPT., AND PERSPECTIVE PURCHASER (A. WOLFE) OF THE BUILDING.

E. CHIEF JANDA OF THE PHILADELPHIA HAZ-MAT TEAM AND OTHER HAZ-MAT OFFICIALS WILL BE ON SITE 12/9/88 TO VIEW SITE ACTIVITIES.

PHILIP YOUNIS, OSC
US EPA, REGION III
PHILADELPHIA, PA

100312

To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Mon 12-Dec-88 15:08 EST Sys
163 (96)
Subject: BELFIELD AVE. POLREP #82
Mail Id: IPM-163-881212-136220137

POLREP #82
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA
ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION (1800 HOURS, FRIDAY, DECEMBER 9TH, 1988)

A. ESTIMATED COSTS TO DATE: COB 12/8/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$ 18.2 K	55 K
TAT	76.9 K	100 K
ERCS	722.0 K	800 K
EPA (INDIRECT)	41.0 K	111 K
-----	-----	-----
TOTAL	858.1 K.	1066 K

TOTAL PROJECT CEILING \$ 1,326,000

B. PERSONNEL ON SCENE:

EPA	1
TAT	2
ERCS	11

C. WEATHER: CLOUDY AND COLD. TEMPERATURES IN THE LOW TO MID 30'S.

II. ACTIONS TAKEN

- A. ERCS CONTINUES OVERPACKING DRUMS AND CONTAINERS ON THE FIRST FLOOR AND IN THE BASEMENT OF THE VISUAL PACKAGING BUILDING. 144 DRUMS AND CONTAINERS OVERPACKED TODAY. TOTAL OVERPACKED TO DATE IS 299.
- B. ERC'S CONTINUES TO DEMOBE GALSON RESEARCH EQUIPMENT THIS DATE 12/9/88.
- C. REBUILDING OF DOCK AREA BY ERCS ONGOING.
- D. ERCS CONTINUING TO PROVIDE SITE SECURITY FOR COMMAND POST AND OPERATIONS AREA.
- E. ERCS BEGAN PREPPING THE NON-PCP CONTAINER STORAGE AREA FOR OVERPACKS.

100313

- F. ERCS FINALIZED LIST OF CONTAINERS (X35) WHICH MUST STILL BE SAMPLED AND ANALYZED FOR WASTE COMPATIBILITY, ERCS WILL INCORPORATE THIS DATA INTO THE WASTE ANALYSIS SCHEME FOR TRANSPORT/DISPOSAL.
- G. OSC YOUNIS CONDUCTED A SITE TOUR WITH CITY OFFICIALS TO VIEW SITE OPERATIONS. INCLUDED IN THE VISIT WERE JOHN HADALLSKI (DEPT. MANAGING DIRECTOR) AND JERRY JANDA (CHIEF OF THE HAZ-MAT TEAM OF PHILADELPHIA). REPRESENTATIVES OF LICENSE AND INSPECTIONS, AND PUBLIC HEALTH WERE ALSO ONSCENE. CITY OFFICIALS OVERWHELMINGLY APPROVED OF SITE OPERATIONS BOTH PRESENT AND FUTURE.

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON AND ENFORCEMENT STEUTEVILLE FOR CLEAN UP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.
- B. OSC WILL CONTINUE TO SEARCH FOR ALTERNATIVE TREATMENT TECHNOLOGIES FOR NEUTRALIZATION OF THE PCP CONTAMINATED WASTE.
- C. ERCS TO CONTINUE DEMOBING GALSON'S EQUIPMENT AND PREPARING DRUMS FOR DISPOSAL.
- D. OSC TO CONTINUE TO OFF-SITE ACTIVITY WITH R. VERNON (RP), PHILA. FIRE DEPT., AND PERSPECTIVE PURCHASER (A. WOLFE) OF THE BUILDING.
- E. ERCS CHEMIST TO LOCATE SUITABLE T & D FACILITY FOR HAZARDOUS MATERIALS ONSITE.
- F. ERCS TO COLLECT ADDITIONAL SAMPLES FOR WASTE COMPATIBILITY DURING WEEK OF 12-12-88.

PHIL YOUNIS, OSC
U.S. EPA, REGION III
PHILADELPHIA, PA

100314

To: ERD/OERR (EPA5511)
 To: REGION03.TAT (EPA9322)
 To: S.JARVELA (EPA9341)
 To: RRC (EPA9374)
 From: RRC (EPA9374) Delivered: Tue 13-Dec-88 14:42 EST Sys 16
 Subject: BELFIELD AVE. POLREP #83
 Mail Id: IPM-163-881213-132331239

POLREP #83

BELFIELD AVENUE SITE

PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION (1800 HOURS, MONDAY, DECEMBER 12TH, 1988)

A. ESTIMATED COSTS TO DATE: COB 12/9/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$ 18.5 K	55 K
TAT	77.8 K	100 K
ERCS	728.4 K	800 K
EPA (INDIRECT)	41.5 K	111 K
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TOTAL	868.2 K	1066 K

TOTAL PROJECT CEILING \$ 1,326,000

B. ON 12/12/88 OSC PUT IN A P.R. TO INCREASE ERCS CEILING FROM \$800 K TO \$1050 K.

C. PERSONNEL ON SCENE:

EPA	1
TAT	2
ERCS	10

D. WEATHER: CLEAR AND COLD. TEMPERATURES IN THE 20'S.

II. ACTIONS TAKEN

A. ERCS CONTINUES OVERPACKING DRUMS AND CONTAINERS ON THE FIRST FLOOR AND IN THE BASEMENT OF THE VISUAL PACKAGING BUILDING. 29 DRUMS AND CONTAINERS OVERPACKED TODAY. TOTAL OVERPACKED TO DATE IS 328.

B. REMOVAL OF GALSON'S RESEARCH EQUIPMENT COMPLETED THIS DATE 12/12/88.

C. ERCS REVIEWED ANALYTICAL WITH OSC AND TAT TO DETERMINE CRITERIA WHICH SHOULD BE CONSIDERED FOR IMPLEMENTATION OF ANY ADDITIONAL SAMPLING AND ALL TSD ARRANGEMENTS.

D. ERCS CONTINUING TO PROVIDE SITE SECURITY FOR COMMAND POST AND OPERATIONS AREA.

100315

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON AND ENFORCEMENT STEUTEVILLE FOR CLEAN UP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.
- B. OSC WILL CONTINUE TO SEARCH FOR ALTERNATIVE TREATMENT TECHNOLOGIES FOR NEUTRALIZATION OF THE PCP CONTAMINATED WASTE.
- C. OSC TO CONTINUE OFF-SITE ACTIVITY WITH R. VERNON (RP), PHILA. FIRE DEPT., AND POTENTIAL PURCHASER (A. WOLFE) OF THE BUILDING.
- D. ERCS CHEMIST TO CONTINUE TO SEARCH FOR SUITABLE T & D FACILITY FOR DISPOSAL OF HAZARDOUS WASTE.
- E. ERCS TO SAMPLE DRUMS AND CONTAINERS OF UNKNOWNNS FOR DISPOSAL OF MATERIALS IN RP VERNON'S WORK AREA.

PHIL YOUNIS, OSC
U.S. EPA, REGION III
PHILADELPHIA, PA

100316

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Wed 14-Dec-88 14:25 EST
Sys 163 (84)
Subject: BELFIELD AVE. POLREP #84
Mail Id: IPM-163-881214-129820908

POLREP #84
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA
ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION (1800 HOURS, MONDAY, DECEMBER 13TH, 1988)

A. ESTIMATED COSTS TO DATE: COB 12/10/88 - 12/12/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$ 18.8 K	55 K
TAT	79.0 K	100 K
ERCS	738.3 K	800 K
EPA (INDIRECT)	42.0 K	111 K
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TOTAL	878.1 K	1066 K

TOTAL PROJECT CEILING \$ 1,326,000

B. ON 12/12/88 OSC PUT IN A P.R. TO INCREASE ERCS CEILING FROM \$800 K TO \$1050 K.

C. PERSONNEL ON SCENE:

EPA	2
TAT	2
ERCS	11

D. WEATHER: SUNNY AND CLEAR. TEMPERATURES RANGING FROM UPPER TEEN'S TO MID 20'S.

II. ACTIONS TAKEN

A. ERCS CONTINUE OVERPACKING DRUMS AND CONTAINERS THROUGHOUT BUILDING. 24 DRUMS AND CONTAINERS OVERPACKED TODAY. 352 TOTAL DRUMS OVERPACKED TO DATE.

B. ERCS REVIEWED ANALYTICAL WITH OSC AND TAT TO DETERMINE CRITERIA WHICH SHOULD BE CONSIDERED FOR IMPLEMENTATION OF ANY ADDITIONAL SAMPLING AND ALL TSD ARRANGEMENTS.

C. ERCS CONTINUE TO "MAKE READY" THE VAULT FOR 100317 OF PCP CONTAMINATED DRUMS.

- D. ERCS CONSOLIDATED DRUMS THROUGHOUT THE BASEMENT AREA SO THEY CAN BE STAGED ON THE MAIN FLOOR.
- E. ERCS CONTINUING TO PROVIDE SITE SECURITY FOR COMMAND POST AND OPERATIONS AREA.
- F. OSC JACKSON ONSITE THIS DATE TO FAMILIARIZE HIMSELF WITH SITE HISTORY AND OPERATIONS. OSC JACKSON WILL NOW BE PREPARED TO DIRECT ACTIVITIES IN THE EVENT THAT OSC YOUNIS CAN NOT BE PRESENT.

III. FUTURE PLANS

- A. OSC TO CONTINUE WORKING WITH RP VERNON AND ENFORCEMENT STEUTENVILLE FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.
- B. OSC WILL CONTINUE TO SEARCH FOR ALTERNATIVE TREATMENT TECHNOLOGIES FOR NEUTRALIZATION OF THE PCP CONTAMINATED WASTE.
- C. OSC TO CONTINUE OFF-SITE ACTIVITY WITH R. VERNON (RP), PHILA. FIRE DEPT., AND POTENTIAL PURCHASER (A. WOLFE) OF THE BUILDING.
- D. ERCS CHEMIST TO CONTINUE TO SEARCH FOR SUITABLE T & D FACILITY FOR DISPOSAL OF HAZARDOUS WASTE.
- E. ERCS TO SAMPLE DRUMS AND CONTAINERS OF UNKNOWNNS FOR DISPOSAL OF MATERIALS IN RP VERNON'S WORK AREA.

PHIL YOUNIS, OSC
U.S. EPA, REGION III
PHILADELPHIA, PA

100318

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Thu 15-Dec-88 12:53 EST
Sys 163 (100)
Subject: BELFIELD AVE. POLREP #85
Mail Id: IPM-163-881215-115950065

POLREP #85
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION (1800 HOURS, WEDNESDAY, DECEMBER 14TH, 1988)

A. ESTIMATED COSTS TO DATE: COB 12/13/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$ 19.2 K	55 K
TAT	80.0 K	100 K
ERCS	743.7 K	1050 K
EPA (INDIRECT)	42.7 K	111 K
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TOTAL	885.6 K	1316 K

TOTAL PROJECT CEILING \$ 1,326,000

B. PERSONNEL ON SCENE:

EPA	2
TAT	2
ERCS	11

C. WEATHER: PARTLY CLOUDY. TEMPERATURES RANGING FROM THE MID 30'S TO THE UPPER 40'S.

II. ACTIONS TAKEN

- A. OSC RECEIVED NOTICE OF PROCUREMENT REQUEST APPROVAL FROM EPA REGIONAL OFFICE TO INCREASE ERCS CEILING BY 250 K.
- B. ERCS CONTINUE OVERPACKING DRUMS AND CONTAINERS THROUGHOUT BUILDING. 35 DRUMS AND CONTAINERS OVERPACKED TODAY. 387 TOTAL DRUMS OVERPACKED TO DATE.
- C. ERCS RM, ALONG WITH EPA OSC AND TAT, COMPLETED REVIEW OF ANALYTICAL DATA AND ARE NOW READY TO PREPARE DISPOSAL PROFILES FOR BULKED WASTE STREAMS.

100319

- D. ERCS SAMPLED 30-34 DRUMS OF UNKNOWN MATERIAL TO DEVELOP SCHEME FOR DISPOSAL. SAMPLING EFFORTS WERE SOMEWHAT HINDERED DUE TO THE EXTREME COLD WEATHER WHICH CAUSED THE MATERIAL WITHIN THE DRUMS TO FREEZE.
- E. ERCS CONTINUES TO "MAKE READY" THE VAULT FOR STORAGE OF PCP CONTAMINATED DRUMS. APPROXIMATELY 134 OVERPACKS WILL BE PLACED IN THE VAULT DURING THE WEEK OF 12/19/88.
- F. A 1 1/4 TON DRUM LIFT WAS BROUGHT ON SCENE TO TAKE OVERPACKED DRUMS OFF OF ROOF AND STAGE ON THE MAIN FLOOR OF THE BUILDING. NOW ALL HAZARDOUS MATERIAL IS STAGED IN ONE AREA ON THE MAIN FLOOR.
- G. ERCS CONTINUING TO PROVIDE SITE SECURITY FOR COMMAND POST AND OPERATIONS AREA.

III. FUTURE PLANS

- A. PCP CONTAMINATED DRUMS TO BE PLACED IN VAULT FOR STORAGE BY WEEK OF 12/19/88.
- B. OSC TO CONTINUE WORKING WITH RP VERNON AND ENFORCEMENT STEUTEVILLE FOR CLEANUP ASSISTANCE. HOWEVER, THE OSC WILL NOT POSTPONE OR DELAY EPA PLANS TO ACCOMMODATE RP VERNON.
- C. OSC WILL CONTINUE TO SEARCH FOR ALTERNATIVE TREATMENT TECHNOLOGIES FOR NEUTRALIZATION OF THE PCP CONTAMINATED WASTE.
- D. OSC TO CONTINUE OFF-SITE ACTIVITY WITH R. VERNON (RP), PHILA. FIRE DEPT., AND POTENTIAL PURCHASER (A. WOLFE) OF THE BUILDING.
- E. ERCS CHEMIST TO CONTINUE TO SEARCH FOR SUITABLE T & D FACILITY FOR DISPOSAL OF HAZARDOUS WASTE.
- F. ERCS TO PRODUCE A DRUM LOG FOR SAMPLES OF UNKNOWN.
- G. ERCS TO CONTINUE OVERPACKING OF DRUMS AND CONTAINERS.
- H. A CONCRETE SLAB WILL BE PLACED IN THE LOADING DOCK OF THE BUILDING ON 12/15/88 FOR FINAL RESTORATION OF THE AREA.

PHIL YOUNIS, OSC
U.S. EPA, REGION III
PHILADELPHIA, PA

100320

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Fri 16-Dec-88 11:11 EST Sys
163 (108)
Subject: BELFIELD AVE. POLREP #86
Mail Id: IPM-163-881216-100660082

POLREP #86
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION (1800 HOURS, THURSDAY, DECEMBER 15TH, 1988)

A. ESTIMATED COSTS TO DATE: COB 12/14/88

	COST TO DATE	CEILING
EPA (DIRECT)	\$ 19.5 K	55 K
TAT	81.1 K	100 K
ERCS	749.9 K	1050 K
EPA (INDIRECT)	43.2 K	111 K
-----	-----	-----
TOTAL	893.6 K	1316 K
TOTAL PROJECT CEILING \$ 1,326,000		

B. PERSONNEL ON SCENE:

EPA	1
TAT	2
ERCS	11

C. WEATHER: MILD AND SUNNY. TEMPERATURES IN THE LOWER 40'S THROUGHOUT THE DAY.

II. ACTIONS TAKEN

- A. THE POTENTIAL BUYER OF THE SITE DISCUSSED WITH THE OSC THE POSSIBILITIES OF MOVING THE PCP CONTAINED MATERIAL OFF OF THE SITE TO THE PARKING AREA ACROSS THE STREET (ADJACENT TO COMMAND POST). OSC EXPLAINED TO THE BUYER THAT THE MATERIAL MUST BE STAGED ON-SITE "WHERE IT IS GENERATED" UNTIL AN APPROVED TSD FACILITY IS AVAILABLE.
- B. OSC AND ERCS RM DISCUSSED OPTIONS FOR SITE SECURITY FOR THE COMMAND POST AND WASTE CONTAINERS WITHIN BUILDING AFTER DEMOBILIZATION OF SITE. IT WAS DECIDED THAT SITE SECURITY WILL REMAIN UNCHANGED (GUARDS AND DOGS).
- C. ERCS DISCOVERED AN 8 oz. JAR OF MEK PEROXIDE WHICH IS MODERATELY TOXIC AND SHOCK SENSITIVE. ERCS CONTACTED THEIR CORPORATE OFFICE TO ACQUIRE INFORMATION REGARDING PROPER HANDLING METHODS FOR THIS MATERIAL.
- D. ERCS RESAMPLED APPROXIMATELY 30 PCP CONTAINERS TODAY TO ADD TO THE ORIGINAL DEPLETED SAMPLES THAT GALSON RESEARCH HAD USED IN THEIR SIMULATION. THESE SAMPLES WILL BE STORED IN THE VAULT IN THE EVENT THAT ADDITIONAL ANALYTICAL IS NECESSARY.

100321

- E. OSC RECEIVED NOTICE OF PROCUREMENT REQUEST APPROVAL FROM EPA REGIONAL OFFICE TO INCREASE ERCS CEILING BY 250 K.
- F. ERCS CONTINUE OVERPACKING DRUMS AND CONTAINERS THROUGHOUT BUILDING. 10 DRUMS AND CONTAINERS OVERPACKED TODAY. 397 TOTAL DRUMS OVERPACKED TO DATE.
- G. ERCS RM, ALONG WITH EPA OSC AND TAT, COMPLETED REVIEW OF ANALYTICAL DATA AND ARE NOW READY TO PREPARE DISPOSAL PROFILES FOR BULKED WASTE STREAMS.
- H. ERCS CONTINUES TO "MAKE READY" THE VAULT FOR STORAGE OF PCP CONTAMINATED DRUMS. APPROXIMATELY 134 OVERPACKS WERE PLACED IN THE VAULT THIS DATE.
- I. A CONCRETE SLAB WAS PLACED IN THE LOADING AREA THIS DATE. THIS COMPLETES THE RESTORATION OF THIS AREA.
- J. ERCS CONTINUING TO PROVIDE SITE SECURITY FOR COMMAND POST AND OPERATIONS AREA.

III. FUTURE PLANS

- A. PCP CONTAMINATED DRUMS TO BE SECURED IN VAULT FOR STORAGE BY WEEK OF 12/19/88.
- B. OSC WILL CONTINUE TO SEARCH FOR ALTERNATIVE TREATMENT TECHNOLOGIES FOR NEUTRALIZATION OF THE PCP CONTAMINATED WASTE.
- C. OSC TO CONTINUE OFF-SITE ACTIVITY WITH R. VERNON (RP), PHILA. FIRE DEPT., AND POTENTIAL PURCHASER (A. WOLFE) OF THE BUILDING.
- D. ERCS CHEMIST TO CONTINUE REVIEW OF ANALYTICAL, BULKING SCHEME PROPOSAL, AND T & D ARRANGEMENTS FOR DISPOSAL OF NEW PCP WASTE.
- E. ERCS TO PRODUCE A DRUM LOG FOR SAMPLES OF UNKNOWNNS.
- F. ERCS TO CONTINUE OVERPACKING OF DRUMS AND CONTAINERS.
- G. ALL NON-PCP WASTE CONTAINERS WILL BE OVERPACKED AND STAGED (ON THE MAIN FLOOR OF BUILDING) BY 12/22/88.

PHIL YOUNIS, OSC
U.S. EPA, REGION III
PHILADELPHIA, PA

100322

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Tue 20-Dec-88 8:41 EST
Sys 163 (70)
Subject: BELFIELD SITE POLREP # 87
Mail Id: IPM-163-881220-078210425

POLREP #87
BELFIELD AVENUE SITE
PHILADELPHIA, PHILADELPHIA CO. , PA.

ATTN. CHARLES KLEEMAN, STEVE JARVELA, TIM FIELDS

I. SITUATION (1800 HOURS, FRIDAY , DECEMBER 16, 1988)

A. ESTIMATED COSTS TO DATE: COB 12/15/88

	COST TO DATE	CEILING
EPA (DIRECT)	19.87 K	55 K
EPA (INDIRECT)	43.82 K	111 K
TAT	82.14 K	100 K
ERCS	758.74 K	1050 K
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TOTAL	904.57 K	1316 K

TOTAL PROJECT CEILING \$ 1,326,000

B. PERSONNEL ON SCENE:

EPA 1
TAT 2
ERCS 11

C. WEATHER: SUNNY AND COLD. TEMPERATURES IN THE UPPER 30'S

II. ACTIONS TAKEN

- A. OH MATERIALS, NORTHEAST REGIONAL HEALTH AND SAFETY MANAGER, KEVIN McMAHON, AND DIVISIONAL MANAGER, JOSEPH FEEYTI ON SCENE THIS DATE.
- B. OH, FEYTI MET WITH OSC, YOUNIS, TO DISCUSS PAST, PRESENT AND FUTURE OBLIGATIONS OF OH MATERIALS, TO EPA AT THE BELFIELD AVENUE SITE. THE MAJOR PROBLEMS DISCUSSED WERE THE LACK OF ACCESSIBILITY OF OH OFFICE STAFF AND THE LACK OF FOLLOW UP FROM OH OFFICE STAFF DURING TRANSPORT AND DISPOSAL ARRANGEMENTS.
- C. ERCS SECURED "VAULT", WHICH CONTAINS 134 DRUMS OF PCP CONTAMINATED MATERIAL, BY CEMENTING THE DOOR SHUT USING CEMENT BLOCKS.
- D. ERCS COMPLETED STAGING OF OVERPACKED DRUMS INTO THE "CAGED" AREA.

100323

III. FUTURE PLANS

- A. OSC WILL CONTINUE TO SEARCH FOR ALTERNATIVE TREATMENT TECHNOLOGIES FOR NEUTRALIZATION OF THE PCP CONTAMINATED WASTE.
- B. ERCS TO PRODUCE A DRUM LOG FOR SAMPLES OF UNKNOWNNS.
- C. ERCS CHEMIST TO CONTINUE TO SEARCH FOR SUITABLE T & D FACILITY FOR DISPOSAL OF HAZARDOUS WASTE.
- D. ERCS TO MOBE-IN DRUM CRUSHER EQUIPMENT FOR PROCESSING OF EMPTY CONTAINERS (DEC. 19, 1988).
- E. ERCS WILL CONTINUE TO PROVIDE SITE SECURITY UNTIL T&D IS COMPLETE.
- F. ALL REMAINING GALSON "PRODUCT DRUMS" WILL BE TRANSPORTED OFF SITE ON DEC. 19, 1988.
- G. ERCS TO COMPLETE PREPPING OF STAGED AREA FOR NON-PCP CONTAINERS.
- H. ERCS TO COMPLETE ALL SITE RESTORATION WORK (SIDEWALKS, BUILDING STRUCTURE, ECT.) WEEK OF DEC. 19, 1988.
- I. ERCS TO DELIVER A WORK PLAN TO EPA FOR THE TREATMENT AND DISPOSAL OF THE MEK PEROXIDE CONTAINER. THE SOLUTION WILL BE TREATED AND DISPOSED OF BY ERCS PENDING EPA APPROVAL ON DEC. 20, 1988.

PHIL YOUNIS, OSC
U.S. EPA, REGION III
PHILADELPHIA, PA

100324

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Thu 22-Dec-88 9:51 EST
Sys 163 (45)
Subject: POLREP 88 FOR BELFIELD AVE. SITE
Mail Id: IPM-163-881222-088720280

POLREP #88
BELFIELD AVENUE SITE
CERCLA REMOVAL PROJECT
PHILADELPHIA, PHILADELPHIA CO., PA
ATTN: STEVE JARVELA, CHARLIE KLEEMAN, AND TIM FIELDS

I. SITUATION (1800 HRS, MONDAY, 12/19/88)
A. PERSONNEL ON SCENE: EPA-1; TAT-2; ERCS-8,
B. WEATHER: CLEAR AND COOL; TEMPS IN THE HIGH 30'S TO MID
40'S;

C. ESTIMATED COST TO DATE: (COB - 12/16/88)

AGENCY	COST TO DATE	CEILING
EPA		
DIRECT	20.1 K	55 K
INDIRECT	44.4 K	111 K
TAT	82.9 K	100 K
ERCS	763.6 K	1050 K
TOTALS	\$ 911.0 K	\$ 1316 K

(TOTAL PROJECT CEILING - \$ 1,326,000)

II. ACTIONS TAKEN:

- ERCS DEVELOPED PLAN FOR DISPOSAL OF APPROXIMATELY ONE OUNCE OF METHYL ETHYL KETONE PEROXIDE.
- ALL MATERIAL BELONGING TO GALSON RESEARCH LOADED ONTO TRACTOR TRAILER FOR TRANSPORT TO LOCATIONS DETERMINED BY GALSON. DESTINATIONS INCLUDE BAYONNE NJ, SYRACUSE NY, AND MIDLAND MI.
- ORIGINAL SLIDING DOOR OF "VAULT" SECURED IN CLOSED POSITION BY LOCK AND CHAIN.
- ERCS GATHERED DRUMS FROM VARIOUS LOCATIONS ON ALL THREE FLOORS OF THE SITE IN PREPARATION OF DRUM CRUSHING OPERATION, PLANNED FOR 12/20/88.

III. FUTURE PLANS

- ERCS TO TREAT/DISPOSE OF METHYL ETHYL KETONE PEROXIDE IN ACCORDANCE WITH THE RESPECTIVE WORKPLAN. TAT TO PERFORM AIR AND SAFETY MONITORING.
- ERCS TO CRUSH ALL "RCRA EMPTY" DRUMS AND PLACE THEM IN THE ROLL OFF FOR LATER DISPOSAL.
- OSC TO CONTINUE TO SEARCH FOR ALTERNATIVE TREATMENT TECHNOLOGIES FOR THE DISPOSAL OF PCP CONTAMINATED WASTE.
- ERCS TO ARRANGE FOR THE RETURN OF ALL RENTAL EQUIPMENT.

PHIL YOUNIS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

100325

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Wed 21-Dec-88 13:05 EST
Sys 163 (66)
Subject: BELFIELD POLREP #89
Mail Id: IPM-163-881221-117891204

POLREP # 89
BELFIELD AVENUE SITE
CERCLA REMOVAL PROJECT
PHILADELPHIA, PHILADELPHIA CO., PA
ATTN: STEVE JARVELA, CHARLIE KLEEMAN, AND TIM FIELDS

- I. SITUATION (1800 HRS., TUESDAY, 12/20/88)
- A. PERSONNEL ON SCENE: EPA-1; TAT-2; ERCS-8.
 - B. WEATHER: CLEAR AND COOL; TEMPERATURES IN THE HIGH 40'S TO MID 50'S.
 - C. ESTIMATED COSTS TO DATE: (COB-12/19/88)
- | AGENCY | COSTS TO DATE | CEILING |
|----------|---------------|---------|
| EPA | | |
| DIRECT | 20.5 K | 55 K |
| INDIRECT | 44.9 K | 111 K |
| TAT | 83.7 K | 100 K |
| ERCS | 783.2 K | 1050 K |
| TOTALS | 932.3 K | 1316 K |
- (TOTAL PROJECT CEILING - \$ 1,326,000)

II. ACTIONS TAKEN

- A. SMALL HOLE IN FENCE ON SOUTH PERIMETER SECURED.
- B. TWO TON FORK LIFT DEMOED THIS DATE.
- C. SMALL CONTAINERS IN BASEMENT OF VISUAL PACKAGING OVERPACKED.
- D. OSC YOUNIS, CONTACTED CAPT. MC ALEER OF PHILADELPHIA HAZARDOUS MATERIALS TEAM TO INVITE HIM TO VIEW SITE BEFORE DEMOBILIZATION.
- E. CEMENT BLOCKS, EXTRA OVERPACKS, AND ELECTRICAL SUPPLIES DEMOED FROM SITE TO O.H. MATERIAL'S WINSOR SHOP.
- F. BRICKWORK REPAIRED ON FRONT (NORTH) SIDE OF BUILDING.
- G. SECOND AND FINAL LAYER OF CEMENT PUT ON SMALL HOLE IN PCP VAULT.
- H. ROLL OFF DUMPSTER ARRIVED ON SITE THIS DATE.
- I. APPROXIMATELY 50 DRUMS CRUSHED AND LOADED ONTO ROLLOFF DUMPSTER.
- J. METHYL ETHYL KETONE PEROXIDE TREATED AND DESTROYED THIS DATE.

III. FUTURE PLANS

- A. MEMBERS OF PHILADELPHIA HAZMAT TEAM TO VIEW SITE 12/21/88.
- B. ALL REMAINING SAMPLES OF UNKNOWN MATERIAL TO BE SHIPPED OUT FOR WASTE CHARACTERIZATION ANALYSIS.
- C. ALL PERSONNEL AND EQUIPMENT EXCEPT COMMAND POST, WATER COOLER, TRASH DUMPSTER, PORT-A-POT, ROLL OFF DUMPSTER AND SECURITY GUARDS TO BE DEMOED THIS DATE.
- D. ERCS TO CONTINUE RESEARCH FOR A SUITABLE TREATMENT AND DISPOSAL FACILITY.
- E. ERCS TO ARRANGE FOR 24 HOUR SECURITY UNTIL T&D IS COMPLETE.

PHIL YOUNIS, OSC
U.S. EPA, REGION III
PHILADELPHIA, PA

100326

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Thu 29-Dec-88 15:40 EST Sys
163 (49)
Subject: POLREP90 FOR BELFIELD AVE.
Mail Id: IPM-163-881229-141060510

POLREP #90
BELFIELD AVENUE SITE
CERCLA REMOVAL PROJECT
PHILADELPHIA, PHILADELPHIA CO., PA
ATTN: STEVE JARVELA, CHARLIE KLEEMAN, AND TIM FIELDS

- I. SITUATION (1800 HRS, WEDNESDAY, 12/21/88)
A. PERSONNEL ON SCENE: EPA-1; TAT-2; ERCS-8.
B. WEATHER: CLEAR AND COOL; TEMPS IN THE HIGH 30'S TO MID 40'S;
C. ESTIMATED COST TO DATE: (COB - 12/20/88)

AGENCY	COST TO DATE	CEILING
EPA		
DIRECT	20.82 K	55 K
INDIRECT	45.47 K	111 K
TAT	84.54 K	100 K
ERCS	789.89 K	1050 K

TOTALS	\$ 940.72 K	\$ 1316 K
(TOTAL PROJECT CEILING - \$ 1,326,000)		

II. ACTIONS TAKEN:

- A. DECONTAMINATION TRAILER DEMOED TO O.H. MATERIAL'S SHOP IN WINSOR MD.
B. 50 KW GENERATOR DEMOED FROM SITE BY SYLVAN TRUCKING.
C. BOBCAT, FORK LIFT, AND TWO SMALL GENERATORS DEMOED FROM SITE BY HERTZ RENTALS.
D. TAT AND O.H. MADE WALK THRU OF SITE FOR FINAL EVALUATION, BEFORE TEMPORARY DEMOBILIZATION.
E. COPY MACHINE DEMOED FROM COMMAND POST.
F. CAPT. J. MCALEER OF THE PHILADELPHIA HAZARDOUS MATERIAL TEAM AND CHIEF J. JANDA OF THE PHILADELPHIA FIRE DEPARTMENT WERE ESCORTED BY OSC YOUNIS WALKED THRU SITE TO REVIEW PROGRESS TO DATE AND TO SEE FIRST HAND THE LOCATION OF THE PCP MATERIAL WHICH IS REMAINING ON SITE.
G. TAT AND O.H. MATERIALS DEMOED EVERYTHING FROM COMMAND POST EXCEPT WATER COOLER, TELEPHONE, AND TABLES, AND CHAIRS.

III. FUTURE PLANS

- A. ERCS TO ARRANGE FOR TRANSPORT AND DISPOSAL OF NON-PCP OVERPACKED MATERIAL.
B. OSC YOUNIS TO CONTINUE RESEARCH FOR AN ALTERNATIVE TREATMENT TECHNOLOGY FOR PCP CONTAMINATED WASTE.

PHIL YOUNIS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

100327

To: ERD/CERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Thu 19-Jan-89 15:31 EST Sys 1
Subject: POLREP 91 FOR BELFIELD AVE. SITE
Mail Id: IPM-163-890119-139650973

POLREP #91
BELFIELD AVENUE SITE
CERCLA REMOVAL PROJECT
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: STEVE JARVELA, CHARLIE KLEEMAN, AND TIM FIELDS

I. SITUATION (1800 HRS, WEDNESDAY, 1/18/89)

- A. PERSONNEL ON SCENE: EPA-1; TAT-2; ERCS-5.
- B. WEATHER: CLEAR AND COOL; TEMPS IN THE HIGH 40'S.
- C. ESTIMATED COST TO DATE: (COB - 1/18/89)

AGENCY	COST TO DATE	CEILING
EPA		
DIRECT	20.6 K	55 K
INDIRECT	45.7 K	111 K
TAT	86.2 K	100 K
ERCS	819.7 K	1050 K
TOTALS	\$ 972.2 K	\$ 1316 K

(TOTAL PROJECT CEILING - \$ 1,326,000)

- D. ERCS PERSONNEL ON SCENE TO COLLECT SAMPLES FROM NON-PCP DRUMS IN ORDER TO GET NEW COMPOSITE SAMPLES, AS REQUIRED BY TSD FACILITIES. THE RESPONSE MANAGER WAS INFORMED LAST WEEK THAT THE ORIGINAL SAMPLES HAD BEEN NEARLY 100% SPENT BY THE LABORATORY, AND THAT MORE SAMPLE VOLUME WAS NEEDED.

II. ACTIONS TAKEN

- A. ERCS MOBED TO SITE AT 0700 HOURS THIS DATE TO PREPARE FOR COLLECTION OF SAMPLES FOR TSD FACILITIES.
- B. OSC YOUNIS AND ERCS RM DISCUSSED CONTACTING THE CITY OF PHILADELPHIA WASTE WATER DIVISION ABOUT PUMPING APPROXIMATELY 250 GALLONS OF ADDITIONAL CONTAMINATED, NON-HAZARDOUS WASTE WATER FROM THE SITE INTO A NEARBY SANITARY SEWER. ANALYTICAL DATA FROM THE WASTE WATER WAS SUBMITTED PREVIOUSLY TO THE WASTE WATER DIVISION AND APPROVED FOR DISCHARGE.

100328

C. TAT PROVIDED CONTRACTOR MONITORING, AIR MONITORING,
AND PHOTODOCUMENTATION DURING SAMPLING.

D. PROSPECTIVE BUYER, H. WOLFE, WAS ON SCENE THIS DATE TO
INQUIRE ABOUT SITE ACTIVITIES.

E. A LOCAL MANUFACTURER WAS ON SCENE THIS DATE TO SPEAK WITH
OSC YOUNIS ABOUT PURCHASING SILICONES AND POWDERS IN THE
BUILDING WHICH HAVE ALREADY BEEN OVERPACKED AND AWAITING
DISPOSAL. OSC EXPLAINED THAT THE PRODUCT/MATERIAL HAD BEEN
EXPOSED TO HIGH TEMPERATURES AND SEVERE WEATHERING
CONDITIONS AND MAY NO LONGER BE USEFUL AS PRODUCT. THE
MANUFACTURER REQUESTED INFORMATION ON HOW TO OBTAIN OTHER
CONTAINERS IN THE BUILDING THAT EPA IS NOT INVOLVED WITH.
HE WAS GIVEN RF VERNON'S TELEPHONE NUMBER AND WAS TOLD TO
MAKE ARRANGEMENTS THROUGH HIM AS LONG AS IT DOES NOT
INTERFERE WITH THE EPA REMOVAL.

F. ERCS COLLECTED 53 INDIVIDUAL SAMPLES FOR TSD PROFILES
AND COMPLETED THE COMPOSITE SAMPLING OF CYANIDE WASTE
STREAM.

III. FUTURE PLANS

A. ERCS TO ARRANGE FOR TRANSPORT AND DISPOSAL OF NON-PCP
OVERPACKED MATERIAL.

B. OSC YOUNIS TO CONTINUE RESEARCH FOR AN ALTERNATIVE
TREATMENT TECHNOLOGY FOR PCP CONTAMINATED WASTE.

C. ERCS TO FINISH COMPOSITE SAMPLING OF WASTE STREAMS FOR
WASTE PROFILES AND T&D.

D. ERCS TO DISPOSE OF CONTAMINATED WASTE WATER ON JANUARY
19-20, 1989.

PHIL YOUNIS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

100329

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: S.JARVELA (EPA9341)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Fri 20-Jan-89 15:37 EST Sys 1
Subject: POLREP 92 FOR BELFIELD AVE. SITE
Mail Id: IPM-163-890120-122610887

POLREP #92
BELFIELD AVENUE SITE
CERCLA REMOVAL PROJECT
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: STEVE JARVELA, CHARLIE KLEEMAN, AND TIM FIELDS

I. SITUATION (1900 HRS, THURSDAY, 1/19/89)

- A. PERSONNEL ON SCENE: EPA-1; TAT-2; ERCS-5.
- B. WEATHER: CLEAR AND COOL; TEMPS IN THE LOW 40'S.
- C. ESTIMATED COST TO DATE: (COB - 1/19/89)

AGENCY	COST TO DATE	CEILING
EPA		
DIRECT	22.0 K	55 K
INDIRECT	47.2 K	111 K
TAT	88.7 K	100 K
ERCS	822.9 K	1050 K

TOTALS	\$ 980.8 K	\$ 1316 K

(TOTAL PROJECT CEILING - \$ 1,326,000)

- D. ERCS PERSONNEL ON SCENE TO COLLECT SAMPLES FROM NON-PCP DRUMS IN ORDER TO GET NEW COMPOSITE SAMPLES, AS REQUIRED BY TSD FACILITIES. THE RESPONSE MANAGER WAS INFORMED LAST WEEK THAT THE ORIGINAL SAMPLES HAD BEEN NEARLY 100% SPENT BY THE LABORATORY, AND THAT MORE SAMPLE VOLUME WAS NEEDED.

II. ACTIONS TAKEN

- A. ERCS PERSONNEL COMPLETE GATHERING COMPOSITE SAMPLES OF ACIDS, BASE NEUTRAL LIQUIDS AND SOLIDS, AND ORGANICS FOR WASTE PROFILES/TSD FACILITIES.
- B. ERCS RM MAKES ARRANGEMENTS FOR ANOTHER RT TO BE BROUGHT ONSITE TO ASSURE THAT COMPOSITE SAMPLES ARE COMPLETED BY COB TOMORROW, 1/20/89.
- C. TAT PROVIDED CONTRACTOR MONITORING, AIR MONITORING, AND PHOTO DOCUMENTATION DURING SAMPLING.

100330

III. FUTURE PLANS

- A. ERCS TO ARRANGE FOR TRANSPORT AND DISPOSAL OF NON-PCP OVERPACKED MATERIAL.
- B. OSC YOUNIS TO CONTINUE RESEARCH FOR AN ALTERNATIVE TREATMENT TECHNOLOGY FOR PCP CONTAMINATED WASTE.
- C. ERCS TO FINISH COMPOSITE SAMPLING OF WASTE STREAMS FOR WASTE PROFILES AND T&D.
- D. ERCS TO DISPOSE OF CONTAMINATED WASTE WATER ON JANUARY 20, 1989.

PHIL YOUNIS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

LD0331

To: ERD/OERR (EPA5511
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA7374)
From: RRC (EPA9374) Delivered: Tue 21-Feb-89 10:45 EST Sys
163 (44)
Subject: POLREP 93 FOR BELFIELD AVE.
Mail Id: IPM-163-890221-096860797

POLREP #93
BELFIELD AVENUE SITE
CERCLA REMOVAL PROJECT
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: STEVE JARVELA, CHARLIE KLEEMAN, AND TIM FIELDS

I. SITUATION (1800 HRS, FRIDAY, 1/20/89)

- A. PERSONNEL ON SCENE: EPA-1; TAT-2; ERCS-6.
- B. WEATHER: COOL, OVERCAST AND WINDY; TEMPS IN THE 40'S.
- C. ESTIMATED COST TO DATE: (COB - 1/19/89)

AGENCY	COST TO DATE	CEILING
EPA		
DIRECT	22.0 K	55 K
INDIRECT	47.2 K	111 K
TAT	88.7 K	100 K
ERCS	827.9 K	1050 K

TOTALS	\$ 985.8 K	\$ 1316 K

(TOTAL PROJECT CEILING - \$ 1,326,000)

- D. ERCS PERSONNEL ON SCENE TO COLLECT SAMPLES FROM NON-PCP DRUMS IN ORDER TO GET NEW COMPOSITE SAMPLES, AS REQUIRED BY TSD FACILITIES. THE RESPONSE MANAGER WAS INFORMED LAST WEEK THAT THE ORIGINAL SAMPLES HAD BEEN NEARLY 100% SPENT BY THE LABORATORY, AND THAT MORE SAMPLE VOLUME WAS NEEDED.

II. ACTIONS TAKEN

- A. ERCS PERSONNEL COMPLETE GATHERING COMPOSITE SAMPLES OF THE NON-PCP WASTE ON SITE.
- B. ERCS RM WORKING ON DISPOSAL FOR EACH WASTE STREAM CONTAINED IN THE NON-PCP WASTES.
- C. TAT PROVIDED CONTRACTOR MONITORING, AIR MONITORING, AND PHOTODOCUMENTATION DURING SAMPLING.

III. FUTURE PLANS

- A. ERCS TO ARRANGE FOR TRANSPORT AND DISPOSAL OF NON-PCP OVERPACKED MATERIAL.
- B. OSC YOUNIS TO CONTINUE RESEARCH FOR AN ALTERNATIVE TREATMENT TECHNOLOGY FOR PCP CONTAMINATED WASTE.

PHIL YOUNIS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

100332

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA7374)
From: RRC (EPA9374) Delivered: Tue 21-Feb-89 10:46 EST Sys
163 (44)
Subject: POLREP 94 FOR BELFIELD AVE.
Mail Id: IPM-163-890221-097040638

POLREP #94
BELFIELD AVENUE SITE
CERCLA REMOVAL PROJECT
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: STEVE JARVELA, CHARLIE KLEEMAN, AND TIM FIELDS

I. SITUATION (1200 HRS, MONDAY, 1/30/89)

- A. BELFIELD AVE. SITE IS CURRENTLY SHUT DOWN AND AWAITING DISPOSAL APPROVAL OF THE NON-PCP WASTE.
- B. 24-HOUR SECURITY IS BEING MAINTAINED DURING THIS SHUT DOWN PERIOD.
- C. ESTIMATED COST TO DATE: (COB - 1/29/89)

AGENCY	COST TO DATE	CEILING
EPA		
DIRECT	22.5 K	55 K
INDIRECT	48.1 K	111 K
TAT	88.7 K	100 K
ERCS	827.9 K	1050 K

TOTALS	\$ 987.2 K	\$ 1316 K
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(TOTAL PROJECT CEILING - \$ 1,326,000)

II. ACTIONS TAKEN

- A. ERCS RM HAD A MEETING ON SITE WITH A REP. FROM THERMALKEM ON 1/23/89 TO DISCUSS DISPOSAL ARRANGEMENTS. THE THERMALKEM REP. STATED THAT DISPOSAL ARRANGEMENTS CAN BE COMPLETED BY MID-MARCH.
- B. ERCS RM SENT THE WASTE PROFILES TO OSC YOUNIS ON 1/27/89.
- C. DISPOSAL ARRANGEMENTS HAVE BEEN MADE FOR THE WASTE SOLIDS TO GO TO CHEM WASTE MANAGEMENT IN EMELE, AL. THE LIQUID AND SLUDGE MATERIALS WILL BE MANIFESTED TO THERMALKEM IN ROCK HILL, SC.

III. FUTURE PLANS

- A. UPON FULL APPROVAL OF DISPOSAL, THE ERCS CREW WILL BE MOBED TO SITE AND THE WASTE TRANSPORTED TO THE DISPOSAL FACILITIES. THIS IS ESTIMATED TO TAKE PLACE BY MID-MARCH.
- B. OSC YOUNIS TO CONTINUE RESEARCH FOR AN ALTERNATIVE TREATMENT TECHNOLOGY FOR PCP CONTAMINATED WASTE.

PHIL YOUNIS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

100333

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)

From: RRC (EPA9374) Delivered: Thu 30-Mar-89 7:57 EST Sys 16

(31)

Subject: POLREP 95 FOR BELFIELD AVE. SITE
Mail Id: IPM-163-890330-071611107

POLREP #95
BELFIELD AVENUE SITE
CERCLA REMOVAL PROJECT
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: STEVE JARVELA, CHARLIE KLEEMAN, AND STAN LASKOWSKI

I. SITUATION (0800 HRS, THURSDAY, 3/30/89)

- A. ALL PCP CONTAMINATED MATERIAL IS SECURED ON SITE IN A SEALED CEMENT VAULT. THOSE MATERIALS AWAITING DISPOSAL ARE FENCED IN, SECURED AND GUARDED 24 HOURS IN THE BUILDING.

II. ACTIONS TAKEN

- A. ON MARCH 17, 1989 OSC YOUNIS LEARNED THAT T&D OPERATIONS WERE STILL ON-GOING AND ADDITIONAL FACILITIES WOULD BE PROFILED DUE TO REJECTIONS FROM THERMALKEM. AS A COST SAVING MEASURE THE OSC ORDERED ERCS TO DEMOBILIZE THE COMMAND POST AND DOWN SCALE SECURITY. THE OSC STRESSED TO ERCS THAT MAXIMUM CONCENTRATION SHOULD BE PLACED TOWARD PROFILING AS MANY FACILITIES AS POSSIBLE TO EXPIDITE ARRANGEMENTS FOR T&D.

III. FUTURE PLANS

- A. OSC YOUNIS TO COORDINATE WITH ERCS ON A REGULAR BASIS TO EXPIDITE T&D PROCESSES.

PHIL YOUNIS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

100334

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: RRC (EPA9374)
From: REGION03.TAT (EPA9322) Delivered: Tue 13-June-89 14:40 EDT
Sys 163 (71)
Subject: POLREP 96 BELFIELD AVE.
Mail Id: IPM-163-890613-132070689

POLREP #96
BELFIELD AVENUE SITE
CERCLA REMOVAL PROJECT
PHILADELPHIA, PHILADELPHIA CO., PA
ATTN: STEVE JARVELA, CHARLIE KLEEMAN, AND STAN LASKOWSKI

- I. SITUATION (1700 HRS, SATURDAY, 6/10/89)
A. TRANSPORTATION AND DISPOSAL OF NON-PCF WASTE OCCURRED ON FRIDAY AND SATURDAY, 6/9&10/89. EPA AND TAT WERE ON SITE TO OVERSEE CONTRACTOR OPERATIONS AND DOCUMENT SITE ACTIVITIES.
B. ESTIMATED COSTS TO DATE: COB 6/10/89

	COST TO DATE	CEILING
EPA INDIRECT	\$ 49 K	111 K
EPA DIRECT	24 K	55 K
TAT	91 K	100 K
ERCS	975 K	1050 K
	-----	-----
TOTAL	1139 K	1316K

TOTAL PROJECT CEILING=\$1,326,000

II. ACTIONS TAKEN

- A. OSC ONSITE TO SIGN HAZARDOUS WASTE MANIFESTS AND DIRECT CONTRACTOR OPERATIONS. ERCS CREWS ON SITE USING HAND TRUCKS AND LIFT GATE TRUCK TO LOAD DRUMS ONTO VEHICLE FOR TRANSPORT.
B. TAT PERFORMED ONSITE CONTRACTOR MONITORING, PHOTO DOCUMENTATION AND UPDATED AND MAINTAINED SITE FILE.
C. TWO SHIPMENTS OF HAZARDOUS WASTE WERE TRANSPORTED OFFSITE, FRIDAY 6/9/89. A ROLLOFF BOX OF CRUSHED DRUMS AND CONTAMINATED PROTECTIVE CLOTHING WAS TRANSPORTED TO GSX OF PINWOOD, SC; THE SECOND SHIPMENT CONSISTED OF DRUMS CONTAINING WASTE PCB, ACID LIQUIDS, OXIDIZER LIQUIDS, FLAMMABLE SOLIDS, ORGANIC SOLIDS, BASE NEUTRALS, CYANINE SOLIDS AND PEROXIDE LIQUIDS. THE SECOND SHIPMENT (TOTALING 98 DRUMS) WAS SENT TO ENSCO, EL DORADO, ARKANSAS FOR INCINERATION.
D. ON SATURDAY, 6/10/89, THREE TRUCKS LOADS OF DRUMS CONTAINING BASE NEUTRAL LIQUIDS, CN LIQUIDS, FLAMMABLE ORGANIC LIQUIDS AND ORGANIC LIQUIDS WERE TRANSPORTED TO CALDWELL SYSTEMS (LENOIR, NC) FOR DISPOSAL. CALDWELL SYSTEMS PROVIDES VARIOUS DISPOSAL METHODS INCLUDING TREATMENT, FUEL BLENDING AND INCINERATION.
E. THERE ARE APPROXIMATELY 20 DRUMS OF CORROSIVE SOLIDS AND MERCURY BASED PESTICIDES THAT REMAIN ON SITE AWAITING DISPOSAL ARRANGEMENTS AND APPROVALS.

III. FUTURE PLANS

- A. OSC YOUNIS TO COORDINATE WITH ERCS ON A REGULAR BASIS TO EXPIDITE T&D FOR THE REMAINING DRUMS ON SITE.
B. ERCS TO MAINTAIN SECURITY THROUGH "SAFE PET" CORPORATION BY PROVIDING GUARD DOG SECURITY.

PHIL YOUNIS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

100335

To: ERD/OERR (EPA5511)
To: RRC (EPA9374)
From: RRC (EPA9374) Delivered: Fri 13-Oct-89 10:40 EDT Sys
Subject: POLREP 97 FOR BELFIELD AVE. SITE
Mail Id: IPM-163-891013-096120095

~~POLREP #87~~
~~BRIDGE AVENUE SITE~~
CERCLA REMOVAL PROJECT
PHILADELPHIA, PHILADELPHIA CO., PA

ATTN: GREGG CRYSTALL, CHARLIE KLEEMAN, TIM FIELDS

I. SITUATION (1700 HRS, WEDNESDAY, 10/11/89)

A. TRANSPORTATION AND DISPOSAL OF NON-PCP WASTE OCCURRED THIS DATE. EPA AND TAT WERE ON SITE TO OVERSEE CONTRACTOR OPERATIONS AND DOCUMENT SITE ACTIVITIES.

B. ESTIMATED COSTS TO DATE: COB 10/11/89

	COST TO DATE	CEILING
EPA INDIRECT	\$ 49 K	111 K
EPA DIRECT	24.1 K	55 K
TAT	91.2 K	100 K
ERCS	985 K	1050 K
	-----	-----
TOTAL	1149 K	1316K
TOTAL PROJECT CEILING=\$1,326,000		

II. ACTIONS TAKEN

- A. OSC ONSITE TO SIGN HAZARDOUS WASTE MANIFESTS AND DIRECT CONTRACTOR OPERATIONS. ERCS CREW ON SITE USING HAND TRUCKS AND LIFT GATE TRUCK TO LOAD DRUMS ONTO VEHICLE FOR TRANSPORT.
- B. TAT PERFORMED ONSITE CONTRACTOR MONITORING, PHOTO DOCUMENTATION AND UPDATED AND MAINTAINED SITE FILE.
- C. A SHIPMENT OF 25 DRUMS OF HAZARDOUS WASTE SOLIDS AND ONE DRUM OF A MERCURY BASED PESTICIDE WERE TRANSPORTED OFF SITE TO ENSCO, INC. IN ELDORADO, ARK. A LOAD OF SEVEN DRUMS OF CORROSIVE LIQUID WERE TRANSPORTED TO CHEM WASTE MANAGEMENT, INC. OF NEWARK, NJ. ONE DRUM OF FLAMMABLE LIQUID WAS TRANSPORTED TO FRONTIER CHEMICAL WASTE PROCESS, INC. IN NIAGARA FALLS, NY.

III. FUTURE PLANS

- A. ALL OF THE PCP CONTAMINATED MATERIAL REMAINS ON SITE IN A CEMENT VAULT WHICH IS LOCKED. OSC YOUNIS TO WORK WITH TAT AND ERCS ON DISPOSAL AND/OR TREATMENT METHODS FOR THIS WASTE.

PHIL YOUNIS, OSC
U.S. EPA REGION III
PHILADELPHIA, PA

100336

To: ERD/OERR (EPA5511)
To: REGION03.TAT (EPA9322)
To: C.KLEEMAN (EPA9340)
To: P.YOUNIS (EPA9347)
To: RRC (EPA9374)
From: P.YOUNIS (EPA9347) Delivered: Mon 13-Nov-89 14:47 EST Sys
Subject: POLREP 98 AND FINAL, BELFIELD AVENUE
Mail Id: IFM-163-891113-133170987

POLREP #98 AND FINAL
BELFIELD AVENUE SITE
CERCLA REMOVAL PROJECT
PHILADELPHIA, PHILADELPHIA COUNTY, PA

ATTN: GREGG CRYSTALL, CHARLIE KLEEMAN, TIM FIELDS

I. SITUATION (1700 HOURS, TUESDAY 10/24/89)

- A. ALL CONTAMINATED MATERIALS HAVE BEEN TRANSPORTED OFF SITE FOR DISPOSAL EXCEPT THOSE CONTAMINATED WITH PENTA-CHLOROPHENOL (PCP).
- B. ALL CONTAINERS WITH PCP-CONTAMINATED WASTE HAVE BEEN OVERPACKED AND SECURED IN A CEMENT VAULT ON SITE. AT PRESENT, THERE ARE NO DISPOSAL FACILITIES APPROVED FOR THE TREATMENT/DISPOSAL OF PCP-CONTAMINATED WASTE.

II. FUTURE PLANS

- A. BECAUSE ALL PCP-CONTAMINATED WASTE HAS BEEN SECURED ON SITE AND OFF-SITE TREATMENT/DISPOSAL IS NOT POSSIBLE, NO FURTHER REMOVAL ACTIONS CAN BE TAKEN. OSC WILL REFER SITE TO REMEDIAL.
- B. TAT TO PREPARE OSC REPORT.

PHIL YOUNIS, OSC
U.S. EPA, REGION III
PHILADELPHIA, PA

100337