



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

August 15, 2001

SR-6J

Richard Laubacher  
Senior Environmental Engineer  
Goodyear Tire and Rubber Company  
1144 East Market Street (D/453F)  
Akron OH 44316-0001

Subject: Completion of Demolition Activities, Fencing Needs, and Benzene Issue at IEL

Dear Mr. Laubacher:

I'd like to take this opportunity to discuss recent activities concerning the Industrial Excess Landfill (IEL) Superfund Site. Namely, the recent completion of demolition activities, the possible need for fencing to prevent vehicles parking on the newly planted area, and the benzene levels found around MW-13 and MW-14.

### Completion of Demolition Activities

USEPA Region 5 appreciates the effort your group expended to complete various site-related activities during the past few months. Although activities were undertaken, for the most part, in accordance with the approved work plan, we were disappointed to learn about the problems removing the 4,000-gallon UST inside the former Uniontown Tire Shop. We are especially concerned with the way VOC samples were collected, per Clayton's July 24, 2001 oversight report (enclosed). The integrity of the samples collected may have been compromised. In an effort to be as objective as possible, we request you provide this office your written opinion on this matter. To prevent this from happening in the future, requirements stipulated in the approved work plan must be followed its entirety.

### Maintenance of Cleared/Seeded Area

USEPA Region 5 recommends that a barrier of some sort (temporary fence/concrete barricade, etc.) be installed along the eastern edge of Cleveland Avenue to prevent vehicles from trespassing on the newly seeded area, formerly occupied by the 3 remaining buildings and USTs. Lake Township concurs with this recommendation and suggests installation proceed as soon as practicable. Please inform this office if you decide to go along with this recommendation.

### Benzene Issue

We received Sharp's July 31, 2001 correspondence related to the elevated levels of

benzene around MW-13 and MW-14. We will provide you a more complete response to your recommendations after we've had an opportunity to conduct some site investigations, hopefully in the very near future. In the meantime, you have or will soon receive a copy of letter, dated August 9, 2001 we sent to Sue Ruley, describing our strategy on the benzene issue. I'd like to make a few observations about the issue concerning these wells:

- The speculation on the condition of the wells is nothing new. As early as 1997 or 1998, our technical experts also surmised that these wells may have heaved, kinked, and/or bent. If my recollection is correct, this issue was discussed in a meeting between our respective parties in early 1998 in Twinsburg, Ohio, held primarily to discuss groundwater modeling efforts at the site;
- U.S. EPA has not used these wells since 1993 (we did obtain splits with you in 1998). I don't believe benzene was an issue at these wells during our 1990-1993 surveys as it is today. Our position was that the site was fully characterized to proceed toward implementing the remedy. We do not plan to conduct another round of sampling. We did take into account the disposition of these and other wells in the monitoring network once remedy implementation will ensue;
- One or more of these wells was targeted for abandonment during the remedial action phase, according to the previous design documents; and
- You talked about the fact that these wells were not double cased as they should have been. There is a plausible explanation for this - I don't believe the wells in question were designed to be used as long as they have been. As stated above, some of them were supposed to be abandoned. Those wells not abandoned would be rehabbed to meet the requirements of the long-term monitoring program that would be developed for the site.

U.S. EPA Region 5 appreciates your timely response on the issues discussed above. If you have any questions, please call me at (312) 886-6195.

Sincerely,



Ross del Rosario  
Remedial Project Manager

cc: Larry Antonelli, OEPA-Northeast District  
Tim Thurlow, ORC

520 South Main Street  
Suite 2444  
Akron, OH 44311-1072  
330.252.5100  
Fax 330.252.5105



July 24, 2001

Ms. Sue Ruley  
Lake Township Trustee  
12360 Market Avenue North  
Hartsville, Ohio 44632

**Clayton Project No.: 35-01004.00**

**Subject: Report on the Oversight of Demolition Activities and Underground Storage Tank Closure Conducted at the Industrial Excess Landfill located in Uniontown, Ohio.**

Dear Ms. Ruley:

Clayton Group Services, Inc. (Clayton), is pleased to present this report on the oversight of demolition activities and underground storage tank (UST) closure at the closed Industrial Excess Landfill (IEL) conducted between July 9 through July 14, 2001. The objective of the oversight was to provide an independent, professional opinion regarding activities conducted at the site. These activities observed by Clayton include the following:

- Demolition of the Uniontown Tire building and Antique Store;
- Removal of one, 4,000-gallon UST beneath the Uniontown Tire building; and
- Collection of appropriate soil samples during UST closure activities.

Sharp and Associates, Inc. (Sharp) managed the demolition field activities. However, Sharp did not manage the UST removal. The UST removal was managed by Eslich Wrecking and their environmental consultant the Joseph Jeffries Company. A summary of field activities follows. Selected pictures taken during site activities are included in Attachment A.

Mr. Ross del Rosario, Remedial Project Manager with the U.S. Environmental Protection Agency (USEPA), observed site activities July 9 and 10, 2001. Mr. Mitch Sweazy, Staff

Geologist with Clayton, provided oversight for activities conducted July 9 through 14, 2001.

### **Demolition of the Uniontown Tire Building and Antique Store**

Eslich Wrecking of Canton, Ohio conducted demolition activities. Sharp and Associates provided oversight of demolition activities for the PRPs. Demolition activities began July 9, 2001 with the partial removal of the Antique Store building.

A fibrous gray insulation not identified during the initial asbestos survey was encountered during the removal of the southern portion of the antique store. Demolition activities were therefore suspended and sampling of the material was conducted by Mr. Matt Miller, Geologist with Sharp and Associates. Mr. Miller is a certified asbestos hazard evaluation specialist with the State of Ohio. Asbestos samples were submitted to American Analytical Laboratories, located in Akron, Ohio for expedited analysis of the asbestos content of the material. Results of the sampling indicated the insulation material was not asbestos-containing.

Demolition of the antique store was continued on July 11, 2001. All building structures, including the foundation, were removed from the property. The basement area located on the north side of the antique store was filled with backfill obtained from Eslich's East Canton Facility. A sample of this fill material was not analyzed by Sharp prior to use at the site. However, Clayton's visual inspection of the fill material did not indicate that the material was contaminated.

Demolition of the Uniontown Tire building took place July 9 through the 12. All building structures, including the foundation, were removed from the property. General construction debris from the site is transported to Eslich's East Canton, Ohio landfill. Aggregate materials such as masonry block and footers were taken to Eslich's crusher facility in Akron, Ohio for recycling.

During excavation activities located in the south garage bay of the west portion of the building, an approximately two foot diameter, three foot deep catch basin filled with a black oil/water mixture was uncovered. It appeared this was located under a former drain in the garage area. A small amount of black oil stained soil was observed by Clayton around this catch basin. Eslich removed the impacted soil and catch basin from the site after mixing the material with other general construction debris from the site taken to Eslich's East Canton, Ohio landfill. At the time this activity took place, both representatives from Sharp and Clayton were briefly offsite for lunch. Mr. Zeke Secor, Senior Environmental Technician with Sharp, took one confirmatory sample from soil beneath the location of the former catch basin. The sample was placed on ice approximately twenty minutes after sampling and transported by Mr. Secor to Severn Trent Laboratory located in North Canton for analysis. The sample was analyzed for

volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and total petroleum hydrocarbons (TPH).

Once demolition of the buildings was complete, Eslich graded the property with topsoil. Topsoil was supplied from Eslich's Manchester Road facility. A sample of this topsoil was not analyzed by Sharp prior to use at the site. However, Clayton's visual inspection of the topsoil did not indicate the material was contaminated. Application of wild flower seeds was performed July 16, 2001.

### **Removal of Underground Storage Tanks (USTs)**

Removal activities associated with one 4,000-gallon UST were conducted on July 13, 2001. Excavation of the UST started by removing soil overburden from the tank. Soil was stockpiled on six millimeter (mm) thick plastic. Akron-Canton Waste Oil was used to attempt to remove the approximately four inches of product with a kerosene odor from inside the tank. However, during removal of the footer overlying the UST the previous day by Eslich, the UST was cut by the excavator. The subsequent cut allowed dirt from the surrounding area to enter into the UST and combine with the product in the tank. This formed a thick sludge that Akron-Canton Waste Oil was unable to pump from the tank using the equipment present. Akron-Canton Waste Oil personnel indicated that only approximately four-gallons of liquid were able to be removed from the tank.

Eslich resumed excavation activities by removing soil located on the west side of the UST to the bottom of the cavity. This was done to assist with quick removal of the UST once both The Joseph Jeffries Company (Jeffries) and Mr. Dave Phillips, Certified UST Inspector through the State of Ohio, arrived onsite.

Mr. Floyd Fernandez, Environmental Assessment Specialist with Jeffries, arrived onsite at 11:30 am. Mr. Fernandez measured the lower explosive limit (LEL) inside the UST. Mr. Fernandez indicated the LEL was zero. Mr. Bill Jeffries, with Jeffries, and Mr. Phillips arrived at 12:00 p.m.

The UST was removed by Eslich from the cavity and placed in an Eslich dump truck. Eslich personnel indicated the tank would be taken to their maintenance shop, cut open, cleaned, and recycled. During the removal of the placement of the tank into the bed of the dump truck a one millimeter (mm) diameter hole was identified on the bottom of the tank. This hole was located on the former north end of the tank. A stream of black liquid with a kerosene odor was release from the hole into the bed of the dump truck. Eslich personnel used absorbent towels to catch the liquid and rotated the tank until the hole was no longer at the bottom.

The UST was in fair condition. Pitting was observed on the lower portions of the tank. One, one mm hole was observed on the bottom of the north side of the tank. This hole

appeared to be caused by removal activities. Additionally, a one-foot hole caused by excavation activities of the footer was located on the south side of the tank. It did not appear that contents in the tank were released from this large hole.

Once the tank was removed, Eslich removed the majority of the backfill material from the UST cavity. Backfill and native soils on the side of the tank consisted of a light brown, sorted medium grained sand with some pebbles. Native material beneath the tank consisted of light tan silty clay. It appeared native soil was used as fill material during the installation of the USTs and therefore was not discernable from the native material at the sides of the excavation.

Product and vent lines associated with the tank were removed during excavation activities. Because the lines extended less than six feet from the tank, samples beneath the lines were not collected. A single pump associated with this tank was removed during a previous phase of UST removals at the site. One sample was collected from beneath this pump during the previous phase.

During excavation activities, a greenish colored silty clay was observed beneath the north end of the tank. It was unclear if this was a natural discoloration of the soil or contamination. The discoloration was approximately two square feet and one foot deep. This discolored soil was removed from the cavity and placed on six mil plastic separated from the previously excavated material. Additional soil material beneath the discolored area was removed in an attempt to ensure removal possibly contaminated soil from the cavity. A total of one to two yards of soil was removed in association with the discolored soil.

Mr. Jeffries was informed by Clayton of special sampling that was outlined in the Work Plan by Sharp, dated December 2000. Mr. Jeffries indicated he would submit the samples for VOCs, SVOCs, and TPH analysis in addition to the required BUSTR analytical. Mr. Jeffries indicated samples would be transported to Caschem for analysis.

Mr. Jeffries collected the closure samples. Samples were initially collected in resealable bags. Mr. Jeffries indicated the samples in the resealable bags were screened using a photo ionization detector (PID). Mr. Jeffries indicated readings for all screened samples were zero. However, Clayton did not observe the screening activity. The amount of time between sampling and screening may not have allowed sufficient time for proper volatilization of organics using the PID screening method.

A total of eight stockpile samples were collected and screened. Six of these samples were taken from the overlying material prior to the removal of the UST. Because this practice does not adequately address materials most likely impacted from a release, Clayton requested two additional samples be taken from excavated fill material once the tank was removed. Mr. Jeffries informed Clayton that he would submit one of the

samples from the excavated fill material beneath the tank. Clayton did not observe sampling of the two stockpile samples from the fill material beneath the tank. However, Mr. Jeffries stated he collected these samples by filling one jar for VOCs and one resealable bag for PID screening as requested by Clayton.

One sample was collected from the discolored soil excavated from beneath the north side of the tank. The sample was collected in one jar for VOCs and one resealable bag for PID readings. No odor was noticed from the discolored soil.

Three samples were collected from native soil beneath the UST. Samples were collected from the ends and middle of the tank. The samples were collected by lowering Mr. Jeffries into the cavity using the excavator bucket. Mr. Jeffries used a dedicated steel spade to collect the samples. These samples were placed in resealable bags for PID screening. Once screened, a sample selected from beneath the north end was placed in sample jars for laboratory analysis. Mr. Jeffries indicated all PID readings were zero. It was decided to submit the north end sample to confirm possible contamination in the discolored soil was completely removed.

Clayton did not observe the packaging of the samples for storage and transportation to the laboratory. Excavated material from the tank cavity, with the exception of soil associated with discoloration, was used to fill the tank cavity.

Discolored soil excavated from the cavity was wrapped in six mil plastic and stockpiled approximately twenty feet east of the former Uniontown Tire building. Pending the analytical results from a sample taken from the material, the soil may be spread out on the property or transported offsite for proper disposal.

Based on observations during the removal of the UST, it does not appear a significant release from the UST has occurred. However, Clayton is concerned with the integrity and validity of the VOC samples collected during removal activities. Because samples for VOCs were not collected directly into jars for laboratory analysis, it is possible volatilization of VOCs exceeding regulatory levels may have occurred. Mr. Jeffries indicated this would not be a problem due to the rapid PID screening and placement of the sample into jars. However, this offers the additional concern samples were not given enough time to volatilize prior to PID screening.

## Summary

Sharp and Jeffries are presently preparing a BUSTR closure report detailing UST activities conducted June 11 through 15, 2001 and July 15, 2001. Clayton will review these reports for accuracy based upon our oversight of activities.

Report on Oversight of On-site Activities  
Industrial Excess Landfill, Uniontown, Ohio  
Clayton Project Number: 35-01004.00

July 24, 2001  
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Based on Clayton's oversight of closure activities associated with the removal of one, 4,000-gallon UST formerly located beneath the southwest corner of the Uniontown Tire building, the UST removal work plan was not followed. VOC screening and sample collection did not ensure the integrity of the samples collected. Additionally, removal of the tank with product inside does not adhere to Ohio Department of Transportation (ODOT) guidelines.

Although signs of a significant release from the UST were not observed during removal activities, the integrity of confirmatory sampling may not be adequate to detect VOCs above regulated levels.

It has been a pleasure assisting you on this project. If you have any questions regarding this summary letter report, please do not hesitate to contact us at 330-252-5100.

Sincerely,



Mitch Sweazy  
Staff Geologist



Thomas P. Shalala, CPG, CP, CHMM  
Manager, Environmental Services  
Northeast Ohio Office

cc: Richard Laubacher- Goodyear Tire & Rubber  
Dave Herbert- Herbert and Benson  
Joe Towarnicky - Sharp and Associates  
Ross del Rosario - USEPA  
Larry Antonelli - Ohio EPA  
Betsy Cuthbertson - US Congress  
Bill Franks - Stark County Board of Health  
Bob Downing - Akron Beacon Journal  
Brad Davis - Canton Repository  
Joy Dingman - Hartville News

Attachments: Photographs



**Attachment A**

**Photographs**



Clayton Project No. 35-01004.00	<b>Description</b>	Demolition of Uniontown Tire Building.	<b>1</b>
	<b>Site Name</b>	Industrial Excess Landfill, Uniontown, Ohio	<b>Date</b> 07/9-15/01
	<b>Client</b>	Lake Township	



Clayton Project No. 35-01004.00	<b>Description</b>	Collection of sample beneath former catch basin.	<b>2</b>
	<b>Site Name</b>	Industrial Excess Landfill, Uniontown, Ohio	<b>Date</b> 07/9-15/01
	<b>Client</b>	Lake Township	





Clayton Project No. 35-01004.00	<b>Description</b>	Sampling of LEL in UST.	<b>3</b>
	<b>Site Name</b>	Industrial Excess Landfill, Uniontown, Ohio	<b>Date</b>
	<b>Client</b>	Lake Township	07/9-15/01



Clayton Project No. 35-01004.00	<b>Description</b>	Placement of UST in dump truck.	<b>4</b>
	<b>Site Name</b>	Industrial Excess Landfill, Uniontown, Ohio	<b>Date</b>
	<b>Client</b>	Lake Township	7/9-15/2001





<b>Clayton Project No.</b> 35-01004.00	<b>Description</b>	Sampling beneath UST.	<b>5</b>
	<b>Site Name</b>	Industrial Excess Landfill, Uniontown, Ohio	<b>Date</b> 07/9-15/01
	<b>Client</b>	Lake Township	



<b>Clayton Project No.</b> 35-01004.00	<b>Description</b>	Completed demolition and grading activities.	<b>6</b>
	<b>Site Name</b>	Industrial Excess Landfill, Uniontown, Ohio	<b>Date</b> 07/9-15/01
	<b>Client</b>	Lake Township	