UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

JAN 18 1994

MEMORANDUM

SUBJECT: Request for Removal Action Approval at the Lorentz Barrel and Drum Site, San Jose, CA, **Action Memo**

Site ID #: **4N**
CAD029295706
Category of Removal: **Non-Time Critical**
Nationally Significant or Precedent Setting: **No**

FROM: Darrin Swartz-Larson, Remedial Project Manager
South Bay Section

TO: Jeff Zelikson, Director
Hazardous Waste Management Division

I. PURPOSE

The purpose of this Action Memo is to request and document approval of the proposed non-time critical removal action described herein, for the Lorentz Barrel and Drum (LB&D) Site located in San Jose, California. Conditions presently exist at the site which, if not addressed by implementing the response action documented in this Action Memo, may lead to human exposure to hazardous substances and the additional off-site migration of contaminants which may pose an imminent and substantial endangerment to the public health or welfare or the environment.

The conditions at the site meet the criteria for initiating a removal action under Section 300.415 of the National Contingency Plan. The action will be conducted by Potentially Responsible Parties; therefore, the statutory limitations of one year and $2 million do not apply.

II. SITE CONDITION AND BACKGROUND

A. Site Description

1. Removal Site Evaluation

A site inspection in August, 1992, revealed several environmental threats that must be addressed in an expedited manner. EPA observed several leaking drums in deteriorating condition, friable asbestos littered about the facility, and many buildings and scrap piles that were in very poor condition. The drums and asbestos were addressed in a time-

critical removal action; however, the buildings and scrap piles remain, and are the subject of this Action Memo.

2. Physical Location

The LB&D site is located at 1515 South Tenth Street, San Jose, in Santa Clara County, about 13 miles southeast of the southern tip of San Francisco Bay. The LB&D site is defined as all land previously used for LB&D facility operations and all areas where contamination from the LB&D facility operations has come to reside. The LB&D site includes a contaminated shallow groundwater plume area and properties containing contaminated soil, structures, debris, and residues.

3. Site Characteristics

The LB&D property, neighboring Recycled Fibers, Inc. (RFI) property, and the surrounding area to the south and west are zoned for commercial/industrial use per the City of San Jose Planning Department. The predominant zoning within a 1-mile radius of the LB&D property is commercial/industrial. The residential and recreational district to the north and east of the LB&D property includes Spartan Stadium (San Jose State University [SJSU] football stadium), San Jose Municipal Stadium (City of San Jose), and SJSU recreation fields. The City of San Jose intends to maintain and further develop the recreational uses of land to the north and east of the LB&D site.

The closest residence to the LB&D property is the SJSU student housing on South Tenth Street, located approximately 700 feet north. Single family residential houses are located 1,100 feet north of the LB&D property. Less than 3,000 people are estimated to live within a 1-mile radius of the LB&D property.

The majority of the San Jose area developed from agricultural use to the current predominant residential/ commercial/industrial use. Review of a 1939 aerial photograph indicates that, prior to development of the LB&D and RFI properties, the nearest developments to the LB&D property consisted of Spartan Stadium to the northwest, SJSU tennis courts to the north, residential housing to the north, and railroad tracks to south.

A 1954 aerial photograph shows the LB&D drum reconditioning facility, including two warehouses. Other facilities on the original LB&D property included an auto wrecker in the southwest corner, California Roofing and Lou Jones Construction to the south of the LB&D facility, and Pacific Sandblast Service (PSS) to the north. Drums were stored on

most of the open areas at the former LB&D facility, including at least half of the property that is now owned by RFI.

Approximately 2.75 acres of the LB&D property have been paved with a tar and gravel mixture (chipped seal) to cover an area once used for drum storage. The paved area overlies soils which are discolored and potentially contaminated. A small portion of this 2.75 acres is covered by an asphaltic-concrete cover installed by LB&D. The remaining 2.5 acres of the LB&D property are unpaved but are covered by five buildings which housed the drum reconditioning facilities, several sumps, an open storage bin located adjacent to the processing facility, various piles of wood, rusted metal debris, numerous empty drums and numerous non-hazardous drums.

4. Release or Threatened Release into the Environment

The Lorentz family started recycling drums at the former LB&D facility in 1947, where operations continued until 1987. Drums for recycling were received from both private and public sources throughout California and Nevada. Private sources included over 3000 different companies and individuals, representing chemical, food, health care, electronics, paint, ink, and paper industries. Public sources included military bases, research laboratories, and county agencies. Many drums arrived at the LB&D facility containing residual aqueous wastes, organic solvents, acids, oxidizers, and oils.

The LB&D facility operations consisted in part of emptying all residues, cleaning, resealing, repainting, and reselling the drums. Residues were removed from the drums by various methods, including caustic and acid washes, incineration, blasting with steel shot, and steam cleaning. Drums were then resurfaced, resealed, and repainted using various substances, including phenolic epoxy resins and rust inhibitors.

From the 1950s until some time between 1976 and 1978, a drainage ditch from the processing facility was utilized to drain wastes. The drainage ditch discharged to a large sump (approximately 30 by 80 feet) located in the northern corner of the LB&D property bounded by the corner of East Alma Avenue and South 10th Street. Aerial photographs of the LB&D site from that time period reveal the presence of liquids in the sump, drainage ditch, and various ponded areas. The sump discharged to the storm drain system. Between 1968 and 1971, the discharge was diverted to the sanitary sewer.

Previous investigations have indicated that discharge to the sanitary sewer ceased in 1983 or 1984. After 1984, liquid wastes were reportedly reduced in volume by evaporation, drummed, and disposed as hazardous waste along with incinerator ash, residual liquids, and sludge. Surface runoff was reportedly collected and recycled in the hot caustic wash cycle of the drum recycling process. As a result of the LB&D facility operations, a large variety of chemical residues from drums delivered to the LB&D site, as well as chemicals used by the LB&D facility in its drum reconditioning processes, have contaminated soil, structures, and shallow groundwater at and beneath the LB&D site. Contaminated groundwater has also migrated about 2,000 feet north of the LB&D property.

5. NPL Status

The LB&D site was placed on the NPL in 1989. The final ROD was signed in August, 1993, and negotiations for remedial design and remedial action may be initiated during 1994.

B. Other Actions to Date

1. Previous Actions

The LB&D facility ceased operations in 1987. In late 1987 and early 1988, the California Department of Toxic Substances Control (DTSC) and the U.S. Environmental Protection Agency (EPA) conducted emergency response actions at the LB&D site that included removal of 3,000 cubic yards of highly contaminated soils at the former main sump area and over 26,000 drums, some of which contained residues. At the conclusion of the removal action, the majority of the LB&D property was paved over.

In 1992, pursuant to a Consent Decree (CD) with EPA, a group of eleven PRPs, known as the Lorentz Shallow Groundwater Task Force (LSGTF), completed construction of and began operating a shallow groundwater extraction and treatment system. This system addresses the VOC contamination of groundwater beneath the LB&D site, as well as the plume that extends approximately 2000 feet north from the former main sump.

2. Current Actions

EPA plans to either implement the final ROD and pursue a cost recovery settlement with PRPs or negotiate with PRPs for implementation of the final ROD. The ROD includes a soil vapor extraction system for cleanup of the soil, and long-term monitoring of the deep aquifer groundwater.

C. State and Local Authorities' Roles

1. State and Local Actions to Date

Since 1981, there have been several environmental sampling studies at the LB&D site aimed at investigating the nature and extent of contamination. Over a period of 6 years, DTSC and LB&D collected soil and groundwater samples from on-site and off-site monitoring wells. In addition, the City of San Jose has been monitoring the site for trespassers.

2. Potential for Continued State/Local Response

The EPA Remedial program assumed the lead from the California Department of Health Services (DHS) in late 1987. The State continues to participate as a support agency.

III. THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT

A. Threats to Public Health and Welfare

Analysis of building surface wipe samples indicates that significant portions of the processing facility structure have pesticide and PCB contamination.

During the course of the RI/FS, the condition of the remaining structures and materials deteriorated and began to present further threats of releases of hazardous substances at the LB&D site. In addition, trespassers added to the threats of releases of hazardous substances by dismantling some of the facility structures and exposing asbestos covered piping.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of pollutants and contaminants from this site, if not addressed by implementing the response action selected in the Action Memo, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

The removal action will consist of the following elements:

- Planning
- Mobilization
- Debris removal
- Demolition and removal of buildings and process equipment

- Demolition and removal of sumps
- Site paving
- Demobilization

The scope of this removal action includes removal of several buildings, sumps, and debris stockpiles from the site. The specific structures and wastes addressed in this action are itemized in Table 1. All wastes specified in Table 1 will be removed and disposed off-site at the completion of the removal action. In addition, the site will be completely paved over.

This Action Memo documents EPA's chosen alternative as presented and discussed in the EE/CA written for this site. EPA's preferred alternative is Alternative A. This alternative proposes that all RCRA non-hazardous materials be disposed of in industrial waste landfills, and all RCRA hazardous wastes be disposed of in RCRA hazardous waste landfills. The various other alternatives are presented in the EE/CA.

2. Contribution to Remedial Performance

Upon completion of the removal, the property will be secured by boarding up the remaining warehouse, covering remaining drums of incinerator ash with a plastic covering, and paving over any exposed surface soils. In addition, the extent of sump excavations will be marked to delineate the boundary between original Lorentz soils and clean backfill. This removal action will facilitate implementation of the final remedy.

3. EE/CA

An Engineering Evaluation/Cost Analysis (EE/CA) has been written for this portion of the removal action, and is attached to this Action Memo. The EE/CA clearly delineates the options considered for the removal action.

4. Applicable or Relevant and Appropriate Requirements (ARARs)

ARARs are identified from information about specific chemicals at the site, specific features of the site location, and actions that are being considered as remedies. The attached ARARs are based on the range of activities to be undertaken during this action, specifically building demolition, sump removal, and debris disposal or recycling. All of the identified applicable requirements will be met.

5. Project Schedule

The project schedule is attached.

B. Estimated Costs

The PRPs have signed an Administrative Order on Consent to perform the work contained in this Action Memo. Estimated costs are presented in Table 2.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If response actions are delayed or not taken, the contamination will continue to spread and trespassers will continue to be exposed to the contamination and the physical dangers posed by the site.

VII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues associated with this site.

VIII. ENFORCEMENT

This removal action will be performed by the following group of seven PRPs: Eastman Kodak Company, Grace Sierra Horticultural Products Company, Hewlett Packard Company, Minwax Company, Inc., National Semiconductor Corporation, National Starch and Chemical Corporation, and Solvent Service Company, Inc. The group has agreed to reimburse all EPA oversight costs associated with the removal actions.

IX. RECOMMENDATION

Because conditions at the site meet NCP Section 300.415(b)(2) criteria for a removal action, I recommend your approval of the proposed removal action. I recommend your approval of funding of oversight of these response actions due to the nature of the threat described herein.

Approved: _____ Date: 1-18-94

Disapproved: _____ Date: _____

TABLE 1
PHASE II WASTE INVENTORY[1,2]

Buildings[3]

Building 1	Treatment Facility
Building 2	Processing Facility
Building 3	Shop and Bathrooms
Building 6	Storage Facility
Building 8	Storage Shed

Building 1 Inventory

- Leak Tester
- Metal Rack
- Boiler
- Stripper Unit Rollers and Rack
- Miscellaneous Scattered Debris

Building 2 Inventory

- Furnace
- Dryer
- Paint Booth 1
- Paint Booth 2
- Paint Booth 3
- Miscellaneous Scattered Debris
- Drum Stripper
- Drum Brusher
- Sand Blaster
- Baghouse
- Metal Trough

Building 3 Inventory

- Miscellaneous Scattered Debris

Building 7 Inventory

- Office furniture
- Cardboard boxes
- Plastic bags containing trash
- Metal and wood barrels containing trash
- Cable and cable spools
- Bicycles (two)
- Miscellaneous scattered debris

Site Debris

- Primary Debris Stockpile
- Building 6 Debris Stockpile
- Organic Debris[7]
- Miscellaneous Scattered Debris including:
  - Vehicles and Trailers[5]
  - Tank Stockpile[6]
  - Horizontal Cylindrical Tank
  - Oven Tank
  - Dumpster 1 (empty)
  - Dumpster 2 (empty)
  - Conveyor
  - Plant Material

Sumps

- Sumps 1 through 3
- Sumps 3a
- Sumps 4 through 13
- Sumps 13a
- Sumps 14 through 16
- Miscellaneous Sump Debris and Liquids

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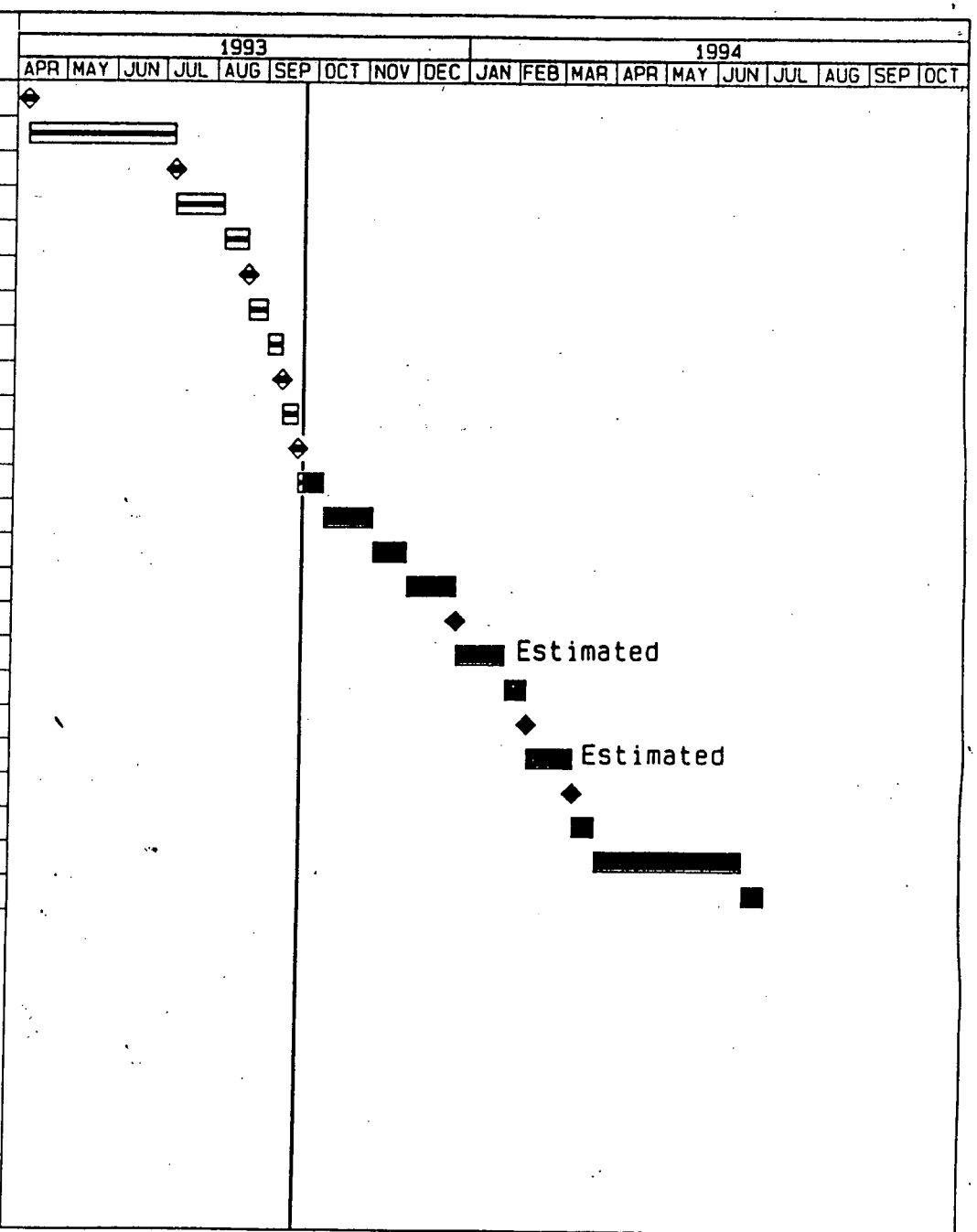
1. Site buildings, process equipment, and debris that are within the scope of the removal action.
2. See Figures 4 and 5 for locations of the buildings, sumps and debris stockpiles at the Site.
3. Building Nos. 1, 2, 3, and 7 also contain process equipment and/or miscellaneous scattered debris that is included in the removal action inventory. Building Nos. 6 and 8 do not contain such wastes. Demolition and removal of Building No. 7 is not included within the scope of the Removal Action.
4. The Building 7 inventory listed in the Table is preliminary and is subject to change based on the conduct of a detailed inventory of the contents of the Building.
5. Includes the following:
   - 1 truck with trailer
   - 1 car
   - 2 trailer beds
   - 2 truck cabs
   - 1 trailer
   - 1 forklift
6. Tank stockpile includes seven tanks.
7. Vegetation that will be generated by preparing exposed soil surfaces for paving. Includes grasses, shrubs, trees, etc.

REMOVAL ACTION
ARARs
LORENTZ BARREL & DRUM SITE

Requirements	Comments
ACTION-SPECIFIC Toxic Substance Control Act (TSCA) (15USC 2605 [e]) (40 CFR Part 761 Subparts D and G) Status: Applicable	Off-site disposal of non-liquid PCBs at concentrations of 50 ppm or greater after 1978 shall be in a TSCA-approved incinerator, a TSCA landfill, or a TSCA-approved alternative method with equivalent performance to incineration.
Standards Applicable to Generators of Hazardous Waste (22 CCR Division 4.5 Chapter 12) Status: Applicable	Generation of hazardous waste shall comply with the generator standards. A waste classification of the debris material on site is required to determine if the waste is hazardous or non-hazardous. The waste must be classified using knowledge of the specific waste characteristics and the toxicity characteristic procedures set forth in 22 CCR Division 4.5, Chapter 11, Article 3.
Bay Area Air Quality Management District (BAAQMD) Rules and Regulations Regulation 6 Regulation 7 Regulation 8, Rule 15 Status: Applicable	Local air pollution control rules and regulations are established to achieve and maintain state and federal ambient air quality standards through the federally approved State Implementation Plan. BAAQMD regulations limit emissions through limitations or standards placed on particulate matter emission rates and concentrations, visible emissions and opacity (Regulation 5), odorous substances (Regulation 7), and organic compounds (Regulation 8). Specifically, Regulation 8, Rule 15, specifies the types of asphalt which may be used and the percent of petroleum solvent they may contain in paving material or in paving and maintenance operations which is applicable to the alternatives involving capping of soils on Site.
Land Disposal Restrictions (22 CCR Division 4.5, Chapter 18) Status: Applicable	Land disposal restrictions (LDRs) are applicable to this Removal Action. Once the Phase II wastes have been characterized, LDR standards will be determined. LDR notifications will be completed indicating the applicable treatment standards, and shipped with the wastes to off-site Treatment Storage Disposal Facilities.
Tank Systems (22 CCR Division 4.5, Chapter 14, Article 10) Status: Applicable	Article 10 requirements include design and performance standards for tank systems that are used for transferring, storing, or treating hazardous waste. If hazardous waste debris are to be decontaminated by a process involving tank systems as illustrated in Figure 12, Article 10 requirements would be applicable to the design and operation of the decontamination system.
Miscellaneous Units (22 CCR Division 4.5, Chapter 14, Article 16) Status: Applicable	Article 16 requirements include design and performance standards for miscellaneous units that are used for transferring, storing, or treating hazardous waste. If hazardous waste debris are to be treated by decontamination (see Figure 12), Article 16 requirements would be applicable to the design and operation of the decontamination system.

ACTIVITY DESCRIPTION	EARLY START	EARLY FINISH	ORIG DUR
Receipt of Phase 1a Sampling Results	8APR93A	8APR93A	0
Prepare Draft EE/CA	8APR93A	6JUL93A	90
Submit Draft EE/CA to EPA	7JUL93A		0
EPA Reviews Draft EE/CA	7JUL93A	5AUG93A	30
Prepare Revised EE/CA	6AUG93A	20AUG93A	15
Submit Revised EE/CA to EPA		20AUG93A	0
EPA Reviews Revised EE/CA	21AUG93A	1SEP93A	12
Prepare Final EE/CA	2SEP93A	10SEP93A	9
Submit Final EE/CA to EPA		10SEP93A	0
EPA Reviews Final EE/CA	11SEP93A	20SEP93A	10
EPA Approves Final EE/CA		20SEP93A	0
Prepare Public Comment Advertisement	21SEP93A	6OCT93	16
Public Comment Period	7OCT93	5NOV93	30
EPA Action Memorandum	6NOV93	26NOV93	21
Prepare Draft Work Plan	27NOV93	26DEC93	30
Submit Draft Work Plan to EPA		26DEC93	0
EPA Reviews Draft Work Plan	27DEC93	25JAN94	30
Prepare Final Work Plan	26JAN94	8FEB94	14
Submit Final Work Plan to EPA		8FEB94	0
EPA Reviews Final Work Plan	9FEB94	8MAR94	28
EPA Approves Final Work Plan		8MAR94	0
Mobilization	9MAR94	22MAR94	14
Removal Action	23MAR94	20JUN94	90
Demobilization	21JUN94	4JUL94	14



Plot Date 24SEP93
Data Date 24SEP93
Project Start 8APR93
Project Finish 4JUL94

Activity Bar/Early Dates
Critical Activity
Progress Bar
Milestone/Flag Activity

LBD3

Sheet 1 of 1

FIGURE 1
LORENTZ BARREL AND DRUM
REMOVAL ACTION SCHEDULE

-----PROJECT SCHEDULE-----

Date	Revision	Checked	Approved
9/93			JH