U.S. ENVIRONMENTAL PROTECTION AGENCY

Superior Barrel and Drum - Removal Update

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: Removal Update
HazCat Complete
Superior Barrel and Drum
Elk, NJ
Latitude: 39.6930670 Longitude: -75.1345550

From:	Keith Glenn, OSC/Environmental Scientist
Date:	11/24/2013
Reporting Period:	November 18, 2013 through November 24, 2013

Current Activities

The collection of aliquots for HazCat purposes was completed during the operational period. HazCat field screening analysis of samples was also completed. Composite samples were generated of neutral liquids in preparation for bulking activities. Additionally, all mercury was extracted from process equipment located around the incinerator.

Site personnel continued to move compromised totes out of the on-site structure and secure them in stable containers. Materials continued to be segregated by hazard class in designated cells located throughout the property.

EPA continued to work with numerous partners including the Gloucester County Fire Marshal's Office, HazMat Team, NJDEP, U.S. Fish and Wildlife, and local officials. NJDEP personnel continued weekly visitations and communication with Elk Township officials also continued. Security personnel continued to patrol the site during non-operational hours.

Response Actions to Date

On November 18, 2013 the structural engineer submitted a report indicating the on-site structure was safe to be utilized for removal activities. Site managers designed warming cells to be built inside the structure for use during colder weather. This room-within-a-room will house the HazCat samples, bulking samples and containers that need to be transferred to DOT approved containers.

Additionally, the EPA held meetings with the surrounding property owners to discuss on-going operations. EPA's On-Scene Coordinator addressed concerns such as press coverage, vandalism, potential migration of contamination, and future sampling opportunities.

Collection of aliquots for HazCat purposes was completed on November 19, 2013. This includes all drums extracted from tractor trailers, all totes inside the structure, and all containers that were found in the open environment. All HazCat field analysis was completed on November 22, 2013. Results have been tabulated in various databases which aid in the generation of bulking schemes.

The laboratory selected to perform analysis of composites visited the site on November 22, 2013 to meet with on-site managers and chemists. The representative was given a tour of the sample processing area and was shown aliquots collected from various containers. This was to aware the laboratory of the various different materials they will be analyzing. Additionally, composite samples were generated from two separate neutral liquid waste streams, N1 and N3. Both classifications represent neutral liquids with N1 potentially containing just water and N3 potentially consisting of water and an organic layer in 50% of the column. A composite for the neutral series represent 35 containers from each sub-class. Samples were transported to the laboratory and will be analyzed for a host of parameters.

Additionally on November 22, 2013, field personnel inspected the incinerator that was used for burning drums during the reconditioning process. Numerous mercury containing switches were found throughout the equipment. All mercury bulbs were removed from the switches and properly stored in anticipation for future disposal.

The Action Memorandum was approved by the Region Administrator on November 22, 2013.

Throughout the operational period the Removal Support Team (RST) continued to deploy and monitor perimeter air monitoring devices. RST also continued working with sampling crews and on-site chemists to maintain integrity of the field sampling and analytical logs. Information gathered from these sheets was entered into Response Manager, a database holding all information from each container. Response Manager allows on-site managers to determine bulking schemes.

Progress Metrics

The numbers below represent an approximation of individual containers that have been through the hazardous characterization field screening system. Many containers had multiple phases of materials which required multiple HazCats to identify the nature of each phase.

	Number of Aliquots for HazCat Collected[1]	Number of Confirmatory Samples*	Number of Surface Soil Samples*	Number of Surface Water Samples*
Cumulative Total	1966	79	36	4

[1]Several containers were opened but aliquot and sample collection was not possible. This count does not include those containers.*Does not include duplicate samples or MS/MSDs for QA/QC.

The hazard class listed below is also an approximation based on information available at the time. Many samples were re-evaluated based on multiple phases and properties exhibited.

Haz Class	Acid	Neutral	Potential Oil	Flammable	Oxidizer	Base	Other	HazCat Complete
Cumulative Total	96	1228	257	369	31	116	12	1966

Waste Stream	Sub-Class	Composite Samples Collected
Neutral		
	N1	1
	N2	0
	N3	1
	N4	0
	N5	0
	N6	0
	N7	0
FLAMMABLE		
	F1	0
	F2	0
	F3	0
	F4	0
	F5	0
	F6	0
	F7	0
	F8	0

Anticipated Activities
Collaboration between EPA, NJDEP, FWS, County, and local officials will continue throughout the removal activities of the Superior Barrel and Drum Site.

During the next operational period containers located inside the structure will be removed. Those that are other than neutral and found to be damaged will have contents transferred into secured containers. Construction of the warming cells will commence. Additionally, bulking schemes will continue to be developed based on the HazCat results. Composite samples will be collected and analyzed by an off-site NELAC accredited laboratory. Neutral liquids are being viewed as the first candidate since this represents approximately 50% of wastes currently on-site. This will also aid the development of tactical operations on addressing the more hazardous materials.

Planned Response Activities
During the next operational period field crews will continue to segregate materials into appropriately designated areas based on hazard class. This will create a more organized operation. The priority is the containers located inside the structure. These containers must be moved in order for construction to commence on the warming cells.

Field chemists and T&D coordinators will continue to develop the bulking schemes based on waste class. Personnel are focused with the neutral liquids as a primary means of establishing operational protocols. Once identified, small amounts of container content will be combined in the on-site laboratory and monitored for any reactions. If confirmed that no reactions have occurred, the composite sample will be sent to the laboratory and analyzed for a host of hazardous parameters. These results will aid in the proper disposal of materials.

The supplier of propane for Superior Barrel and Drum was contacted for the removal and recycling of propane tanks found on-site. The supplier will make arrangements with site managers for the removal of tanks in the next few weeks.

As short term goals are accomplished, operations will move into consolidating materials, waste removal, container destruction, inspection of potentially buried underground storage tanks and drums, and performance of additional soil investigations.