U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Dewey Loeffel Landfill (Tributary T11A) - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #2**
Dewey Loeffel Landfill (Tributary T11A)
A223
Nassau, NY
Latitude: 42.5599974 Longitude: -73.5722330

To: Keith Glenn, Region 2, ERRD, RPB
Joe Rotola, USEPA Region 02

From: David Rosoff, OSC
Date: 11/17/2017
Reporting Period: 10/11 - 11/17/2017

1. Introduction

1.1 Background

Site Number:	A223	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	PRP	**Incident Category:**	Removal Action
NPL Status:	NPL	**Operable Unit:**	2
Mobilization Date:	10/9/2017	**Start Date:**	10/9/2017
Demob Date:		**Completion Date:**	
CERCLIS ID:	NYD000512335	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

PCB contamination in sediment and soil of Tributary T11A

1.1.2 Site Description

The Dewey Loeffel Landfill Superfund Site ("Site") was listed on the NPL in 2011. The site includes an inactive hazardous waste disposal area (the “Landfill”) and the releases from it into nearby surface drainageways, including the former Mead Road Pond, Tributary T11A, Valatie Kill, Valley Stream, Smith Pond and Nassau Lake, and an underlying groundwater aquifer. The landfill/groundwater and surface drainageways are being addressed under two separate RI/FSs. Under the current project schedule, EPA is scheduled to issue a ROD for the surface drainageways in 2021. The discussion in this Pollution Report is focused on the removal action for Tributary T11A. Information on the status of the landfill and groundwater investigations and cleanup can be found documented in other locations.

1.1.2.1 Location

The former Dewey Loeffel Landfill is located along Mead Road in the Town of Nassau, Rensselaer County, New York, and is situated within a low-lying, 19.6-acre easement between two wooded hills. The Dewey Loeffel Landfill Site includes a former hazardous waste disposal area and its associated releases to several bodies of water and tributaries, including the former Mead Road Pond, Tributary T11A, Valatie Kill, Nassau Lake and an underlying groundwater aquifer. The Landfill itself is approximately 11 acres in size. The surrounding areas are mostly undeveloped, wooded land, although there are some residences to the north, southeast, south, southwest and west of the Site and a summer sleep-away camp is located to the south of the Site. It is estimated that there are at least 50 homes within a one-mile radius of the Site.

Tributary T11A (“T11A”) is part of the Western Drainageway emanating from the Landfill and flows from the Mead Road Pond area to the Valatie Kill. T11A is a small stream that flows northwesterly through a steep-sided, wooded ravine. The tributary is about 1,900 feet long and slopes at an approximate 7 percent grade. T11A often has low and, in the upper reach, intermittent flow rates, although the flow is highly variable based on precipitation and snowmelt events.

T11A flows through three private properties with the same owner. The three properties are largely wooded and contain an ATV trail and access road that run parallel to T11A. The former access road and ATV trail coexist along the upper portion of T11A and only the former access road extends parallel to the downstream portion of T11A. The ATV trail and access road run approximately 50-150 feet to the north of T11A. From the access road/ATV trail, access is generally more challenging in the upstream portion due to steep slopes and is more easily accessible near T11A’s confluence with the Valatie Kill. The T11A area is not currently posted as containing contamination nor is it fenced to restrict access to the stream bed and banks.

1.1.2.2 Description of Threat

From approximately 1952 to 1968, the Landfill was operated by Richard Loeffel (until his death in 1959), his son Dewey Loeffel, and companies owned by the Loeffels. Approximately 46,000 tons of industrial and/or hazardous waste were transported to and disposed of at the Site by Loeffel's Waste Oil and Removal

Service Company, Inc., and Marcar Oil, Inc., companies owned by Mr. Loeffel. The waste included, but was not limited to, volatile organic compounds ("VOCs") (including benzene, toluene, xylene, methyl-ethyl ketone, trichloroethylene, chlorobenzene, 1,2-dichlorobenzene, 1,4-dichlorobenzene, 1,1-dichloroethane, 1,2-dichloroethylene, and/or vinyl chloride), waste oils, sludges, and liquid and solid resins and polychlorinated biphenyls ("PCBs"). Wastes were deposited by the General Electric Company (“GE”), Schenectady Chemicals, Inc. (now SI Group, Inc.), and Bendix Corporation (now Honeywell International, Inc.).

Between 1989 and 2002, several sediment and soil sampling events were conducted in T11A under NYSDEC. A remedial action was implemented by GE for T11A in 2002-2003 pursuant to a remedy selected by NYSDEC, which included the removal of fine-grained sediment from the tributary, but did not call for the removal of floodplain soils. Prior to remedial action in 2002, PCB concentrations in the sediments of T11A ranged up to a maximum concentration of 230 parts per million (ppm). In October 2002 through January 2003, approximately 760 cubic yards of PCB-contaminated sediment was excavated from the stream bed using a combination of vacuum trucks, hand excavation and limited machine excavation with a small, tracked excavator. During this project, an access road was constructed along the northern bank of T11A overlooking the stream and a telescoping boom crane was employed to lower equipment into the tributary. Excavated sediment was placed in steel boxes lowered into the tributary and removed by the crane. This was a very surgical operation designed to avoid removing trees and shrubs from the stream bank. Removal of the tree canopy would have allowed sunlight to reach the stream, warm its waters and reduce its value as a nursery for fingerling trout. Extensive habitat restoration was performed following remedial efforts, including the construction of dams, weirs and pools to promote fish habitat.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In five separate sampling events from 2009 to 2014, EPA, NYSDEC and GE collected 58 sediment samples and 256 soil samples from T11A. A summary of the results is provided in the table below. Elevated PCB concentrations are generally concentrated into 4 hotspot areas of T11A floodplain soils.

Tributary T11A Post-Remediation Total PCB Results (2009-2014)				
Location	No. of Samples	Min (mg/kg)	Mean (mg/kg)	Max (mg/kg)
Sediment	58	0.19	4.7	22.6
Soil	256	ND	29	1,340

Elevated levels of PCBs (i.e., greater than 50 ppm) were detected in 23 floodplain soil samples up to a maximum of 1340 ppm. The maximum concentration of PCBs detected in T11A sediment was 22.6 ppm. The elevated PCB concentrations in floodplain soils of T11A are concentrated into 4 general hotspot areas.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On September 7, 2017 EPA approved General Electric’s proposal (dated September 6, 2017) to conduct additional removal activities under existing AOC CERCLA 02-2012-2005 (Paragraph 47f). Specifically this work will be to assess and fully remediate the PCB contamination in Tributary 11A.

2.1.2 Response Actions to Date

GE's contractors mobilized to the field on October 9, 2017 to begin habitat assessment work. Between 11/6 and 11/17 GE's contractors sampled over 180 locations resulting in the collection of over 400 samples. Intervals sampled included 0-6", 6-12", 12-18" and 18-24" where possible. Deeper samples will be held for analysis pending the results from shallower intervals. Samples will be analyzed for PCBs. Results are expected by early to mid December.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

GE has proposed to address contamination in Tributary 11A under the existing Removal AOC. Paragraph 47.f of the Removal Settlement Agreement is being utilized to conduct the PCB-impacted sediment and bank soil removal action.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities

The removal action will consist of the excavation and appropriate disposal of PCBs to a 1 ppm clean up level in Tributary T11A. The results of the pre-removal action design sampling will help delineate the extent of contamination and support the drawing of excavation cut lines. In addition, it is hoped that the results support the use of the 50 year floodplain as the maximum extent of > 1 ppm PCB contamination and thus allow it to serve as the extent of horizontal excavation.

2.2.1.1 Planned Response Activities

GE will Submit a Data Summary Report that will:

- Provide a summary, tables and figures presenting the analytical results for all samples collected
- Provide a figure depicting stream morphology and bank vegetation.

The anticipated submittal of this report to EPA is thirty days after GE receives the final sampling data from the laboratory.

GE will submit a Removal Action Design Report that will:

- Provide the bounds of removal, schedule, general removal techniques, construction monitoring program,transportation and disposal of the materials, backfill, restoration, removal documentation approach, and Post-Removal Monitoring Plan (including restoration criteria and a habitat restoration inspection, maintenance and reporting schedule) that will focus on T11A restoration work. It is anticipated that significant in-stream features will be generally recreated, to the extent feasible.

The anticipated submittal of this report to EPA is sixty days after USEPA's approval of the Data Summary Report.

Implementation of the Removal Action construction will be accomplished by GE in accordance with USEPA-approved Removal Action Design Report. Implementation is anticipated to take approximately 5 months, starting ninety days after EPA's approval of the Removal Action Design Report (Target start time in June 2018). A **Construction Completion Report** will be submitted by GE providing a summary of the work completed under this removal action, and provide an as-built record of the removal and restoration. Anticipated submittal of this report to EPA is Ninety days after the completion of construction. GE will submit **Post-Removal Monitoring Plan Reports** in accordance with USEPA-approved Post-Removal Monitoring Plan.

2.2.1.2 Next Steps

Analysis of the samples collected this past week will be complete in early to mid December. Preliminary data will be shared with EPA. A formal report will be submitted early next year.

2.2.2 Issues

Winter weather may become an issue for any additional sampling that may be required based on the results of the most recent sampling.

2.3 Logistics Section

EPA has utilized very limited Contractor oversight from Louis Berger, Inc. for the field work so far.

2.4 Finance Section

2.4.1 Narrative

This is an RP lead Removal Action. There is no expectation of extramural costs to be incurred.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

NYSDEC is cooperating with EPA to oversee GE's performance of this removal action. NYSDEC will participate in regular conference calls with GE and EPA during the work and is involved in reviewing and commenting on GE's submittals.

4. Personnel On Site

OSC Rosoff
RPM Battipaglia

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.