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U.S. Environmental Protection Agency Region II
Emergency and Remedial Response Division
Response and Prevention Branch

On-Scene Coordinator's Report
Wide Beach
PCB Contamination, Phase II
Town of Brant
Erie County, New York

OSC: Robert M. Cobiella, P.E.

Assistance Provided by:
Roy F. Weston, Inc.
SPILL PREVENTION & EMERGENCY RESPONSE DIVISION
In Association with ICF Technology Inc., C.C. Johnson & Malhotra, P.C., Resource Applications, Inc., Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.

TAT-02-F-03599

ON-SCENE COORDINATOR'S REPORT
PCB REMOVAL ACTION, PHASE II
WIDE BEACH, TOWN OF BRANT, ERIE COUNTY, NEW YORK

SITE IDENTIFICATION NUMBER: 46

Prepared For:
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U.S. Environmental Protection Agency, Region II
Edison, New Jersey 08837

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Robert M. Cobiella, P.E., OSC
Site Mitigation Section

Date of Release: JANUARY 13, 1988

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EXECUTIVE SUMMARY

In 1981, Erie County received a complaint from a Wide Beach resident that PCB contaminated oil may have been used for dust control on the local roads and that empty steel drums were located in a wooded area at Wide Beach.

In response to the complaint, sampling was initiated by Erie County. The extremely high PCB levels found were confirmed by an EPA Region II Field Investigation Team (FIT) and by a New York State Department of Environmental Conservation (NYSDEC) consultant, EA Engineering, at a later date.

The cause of the problem was that between 1968 and 1978 from 27,500 to 41,000 gallons of waste oil were applied to control dust on the gravel roads at the Wide Beach Community. It appears that part of the waste oil used was heavily contaminated with Aroclor 1254 PCB. The PCB levels found in homes at the site were among the highest ever encountered in this country; 1,000 ppm in ditches, and over 700 ppm in carpet dust in residences.

In May 1985, and at the request of the NYSDEC, the U.S. Environmental Protection Agency (EPA) initiated a removal action in defense of the health of the residents of Wide Beach.

The action consisted of paving over the areas of highest outdoor contamination, refurbishing the existing site drainage system where possible, limiting storm water runoff to the paved areas, installation of particulate filters in residential well water supply systems and decontamination of residences.

Samples were taken from six of the homes during this action both prior to and following seven to eight weeks of busy summertime occupancy. Based on the sampling results, it was concluded that the home decontamination action was effective in protecting the residents.

The final phase of this CERCLA removal action took place during November 1986 and consisted of unclogging and

reconditioning an existing storm drainage pipe running from the intersection of South Street and the Oval south to the swamp on the Cattaraugus Indian Reservation; the installation of two manholes/catch basins with locking covers; the resodding of the turf damaged during the operation; and the drumming and storing on site of the excavated PCB contaminated soil, vitrified clay pipe (VCP) fragments, and old catch basin parts for future disposal.

This second phase is the subject of this report.

WIDE BEACH, PCB CONTAMINATION

TOWN OF BRANT, NEW YORK

ON-SCENE COORDINATOR'S REPORT

REMOVAL ACTION, PHASE II

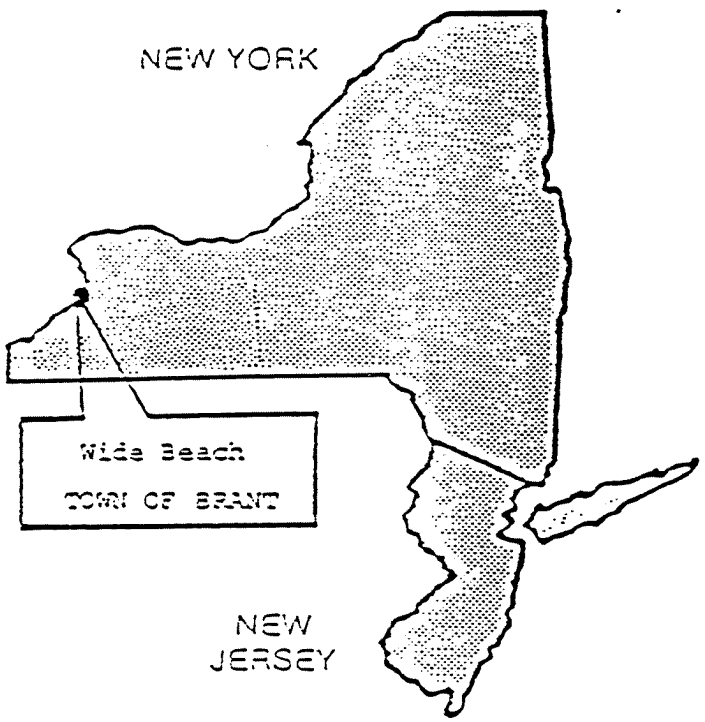
1.0 SUMMARY OF EVENTS

1.1. Site Description and Location:

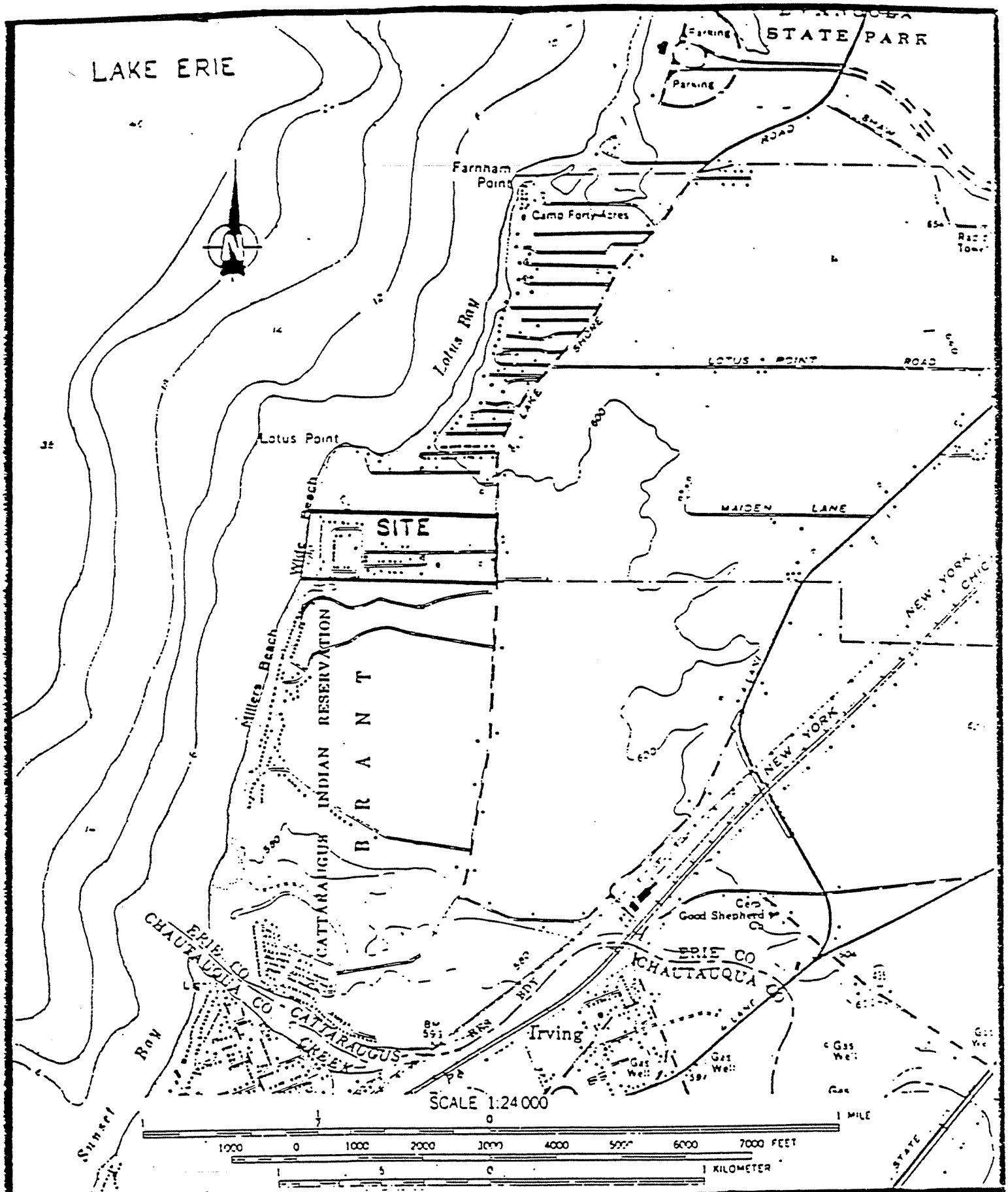
Wide Beach is a fifty-five (55) acre Erie County, New York, site comprising a long, narrow suburban development (Figure 1). The site includes one access road (Fox Road), one side road (South Street), one loop (the Oval) and fifty-nine (59) homes plus one small trailer, for a total of sixty (60) residences. There are also several empty lots. The terrain is quite flat, generally draining to the south into the Cattaraugus Indian Reservation and fronting on Lake Erie along its short west face (Figure 2).

1.2. Initial Situation:

Refurbishing existing site storm drains was undertaken during the initial removal action (Phase I).



WESTON	SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPA PM Robert M. Cobiella	FIGURE 1
	In association with ICF, Inc.,	TAT PM Rodolfo J. Hafner	LOCATION MAP



WESTON • SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPA PM: Robert M. Cobiella	FIGURE 2. SITE MAP
In association with ICF, Inc.,	TAT PM Rodolfo J. Hafner	WIDE BEACH TOWN OF BRANT, N.Y.

drainage system. However, one storm drain was not refurbished. That storm drain was located on Mr. Thomas Rusch's property and drained a sizeable area of the Wide Beach Community Site. The homeowner, Mr. Rusch, had refused EPA access to his property to recondition the drain. This denial resulted in the ponding of storm water upstream of the clogged drain, flooding portions of Fox and South streets, the Oval and the front, side and backyards of the Grabenstater and Hellman residences. The water reached the water wells at both homes, thus threatening their water supplies with surface water and PCB contamination.

The OSC took steps in the defense of the health of these Wide Beach homeowners by preparing an action memorandum requesting the reauthorization of funding, and exemption from the six months CERCLA time limit, for a removal action to refurbish the inoperative drain.

The removal action could not start on site until guaranteed access to the Rusch property had been obtained. The OSC conducted numerous telephone

conversations with the NYSDEC in order to lawfully force Mr. Rusch to provide access for EPA to refurbish the clogged drain.

The New York State DEC, by certified letter dated September 9, 1986, served notice on the Rusch's that, under the provisions of the Environmental Conservation Law and Eminent Domain Law of the State of New York, NYSDEC and its designees would enter the Rusch property, to mitigate a significant environmental health hazard at any time on, or after, October 1, 1986.

1.2.1. Request for Action:

Please refer to 6.0 Appendix, for copies of pertinent documents.

1.3. Efforts to Obtain Response by Responsible Parties:

Attempts to secure removal by responsible parties predated the OSC involvement with the site by several years and are largely unknown to the OSC. As a result, no information regarding this subject will be included in this report. The site is also being investigated for remedial action.

1.4. The Organization of the Response:

All on site work was planned for completion, by the in place Emergency Response Cleanup Services (ERCS) Contractor, O.H. Materials Company (OHM), of Findlay, Ohio. The EPA Technical Assistance Team (TAT) contractor provided on site contractor monitoring during both Phase I and Phase II.

1.5. The Resources Committed:

On September 29, 1986, the OSC, Mr. Robert Cobiella, P.E. transmitted by mail to Mr. Robert Ohneck, Program Manager for O.H. Materials Company (ERCS

Contractor), the written delivery Order No. 6893-02-065, under Contract No. 68-01-6893. (See Appendix B for delivery order and pages 12 and 13 for financial information.)

1.6. Threat Abatement Action Taken:

On October 30, 1986, an informal initial meeting took place at the site. Attending were Messrs. Robert Cobiella, P.E., OSC; Mark Pane, U.S. EPA; Rodolfo Hafner, TAT II; James Feron, NYSDEC, M. G. McCargo and T. Scott, NYSDEC Environmental Conservation Officers; D. Kuhn and W. Less, SLC Consultants, Inc. subcontractors for the ERCS contractor.

The conservation officers talked with Mr. Rusch, who came out of his home to meet the OSC and Mr. Feron. Mr. Rusch subsequently granted EPA permission to enter his property and unclog and refurbish the drain.

After entrance to the property was granted, the OSC decided to start as soon as possible due to the approach of winter.

The work plan included: the cleaning and unclogging of the 8 inch VCP, refurbishing any section found plugged beyond repair; replacing the existing catch basins (barrels), one of which was plugged and buried; installing lockable manhole covers; and refurbishing grass areas damaged during the work.

Work at the site commenced on November 4, 1986, with the pumping of water out of the drainage ditch, located on Oval between Fox and South streets. The water was pumped across the street from where it could drain to the swamp through another drain.

The catch basin and the lower portion of the pipe were cleaned prior to digging out the buried barrel at the edge of Rusch's property near the corner of South and Oval. While digging out the barrel, it was discovered to be one third full of concrete, as were both pipes going in and out of the barrel. The pipe going down gradient from the barrel was also discovered to be hopelessly clogged about 70 feet downhill.

After several exploratory holes were dug, the pipe was located, dug out, and found to be clogged with grout. A monitoring well had been drilled through the drainage pipe. Five new sections of pipe were installed, so that the pipe would clear the well and the hole was backfilled. Two concrete casings were installed in place, instead of the barrels. The casings had holes cut to fit the pipes, the bottoms were filled with concrete and formed to create a channel, the 8" drainage pipes connected and a manhole frame with lockable cover installed.

The manhole on the other side of South Street was left in place with a temporary concrete cover until the new manhole frame arrived. Work continued on October 20, when the second manhole frame arrived on site. After this manhole frame was installed, leftover soil was removed, and sod was laid over the damaged grass areas.

1.7. Community Relations Activities:

All community relations activities were carried out during Phase I of this project. No community relations activities were needed during Phase II.

2.0 EFFECTIVENESS OF THE REMOVAL ACTION

2.1. By Responsible Party:

None provided.

2.2. By State, Local Forces and Private Groups, or Volunteers:

An investigation was conducted prior to any request for a removal under CERCLA. This activty was performed by EA Engineering, Science and Technology, Inc. under NYSDEC oversight. EA Engineering, Science and Technology, Inc. representatives were frequently present on site during Phase I of the removal action and reported on progress to the NYSDEC. They were helpful in locating sampling wells. No removal action was undertaken by any State or Local Government, nor by any responsible party or volunteer organization.

3.0 Problems Encountered

No significant problems were encountered, except for routine delays and minor setbacks normal to this type of work.

4.0 Recommendations

It is here recommended that the effectivness of this action in protecting the health of the residents and in limiting the migration of Arochlor 1254 from the site be evaluated carefully before this agency initiates any specific final remedy for this site.

5.0 FINAL FINANCIAL REPORT

A.	Total Funds Originally Authorized	$ 820,770
1.	Mitigation Contract Authorized Funding	742,490
B.	Expenditures for Mitigation Contracting	
1.	Obligated to O.H. Materials (KCS471)	317,950
2.	Expended KCS471 Funds	317,950
3.	Balance of KCS471 Funds	-0-
4.	Obligated to O.H. Materials (KCS485)	322,000
5.	Expended KCS485 Funds	322,000
6.	Balance of KCS485 Funds	-0-
7.	Obligated to O.H. Materials (KCS499)	30,000
8.	Expended KCS499 Funds	22,139
9.	Balance of KCS499 Funds	7,861
10.	Unobligated Authorized Funding	72,540
11.	Estimated Total Expenditures Thru 9/20/85 (Delivery Order No. 6893-02-023)	662,089
12.	Extramural (TAT) Estimated Costs	57,725
13.	Intramural EPA Estimated Costs	18,500
14.	Total Estimated Expenditures, Phase I and % of $1,000,000	$ 738,314 (73.8%)
15.	Funding Reauthorization of July 15, 1986	40,000
A.	Mitigation Contract Reauthorized Funding	30,000

16.	Expenditures for Phase II Mitigation Contracting	
	A. Obligated to O.H. Materials (KCS375)	30,000
	B. Expended KCS375 Funds	$ 11,908
	C. Balance of KCS375 Funds	18,092
17.	Unobligated Reauthorized Phase II Funding for Mitigation Contracting	-0-
18.	Phase II Extramural Costs To Date	4,140
19.	Estimated Phase II EPA Costs To Date	3,000
20.	Estimated Total (Phase I and Phase II) Mitigation Contracting Cost to Date	673,997
21.	Estimated Total (Phase I and Phase II) Extramural (TAT) Cost To Date	61,865
22.	Estimated Total (Phase I and Phase II) EPA Cost To Date	21,500
23.	Total Estimated Expenditure (Phase I And Phase II) To Date and % of $1,000,000	757,362 (75.7%)

Appendix A

Region II

Immediate Removal Funding Request For Wide Beach PCB Contamination Site, Town of Brant, Erie County, New York- ACTION MEMORANDUM

Robert M. Cobiella, On-Scene Coordinator
Response and Prevention Branch

5/13/85

Christoper J. Daggett
Regional Administrator

FINAL

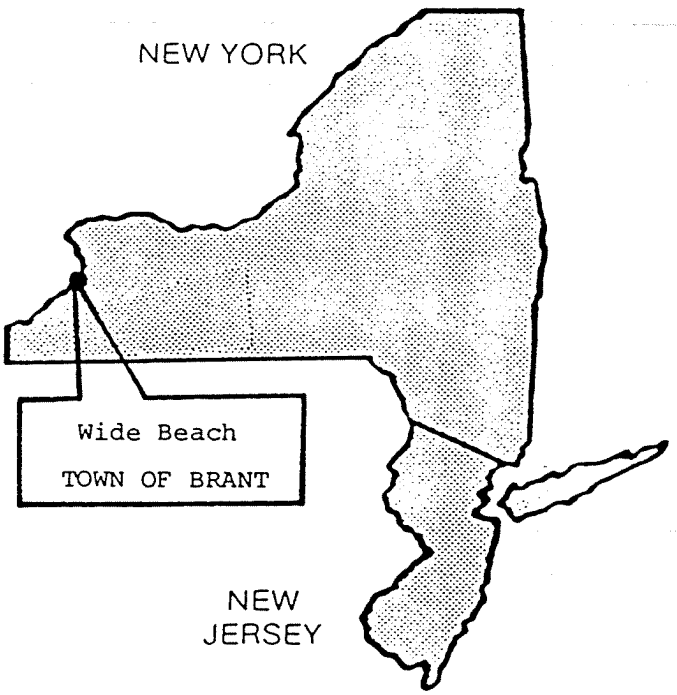
THRU: W. Librizzi, Director
Emergency and Remedial Response Division

I. PURPOSE:

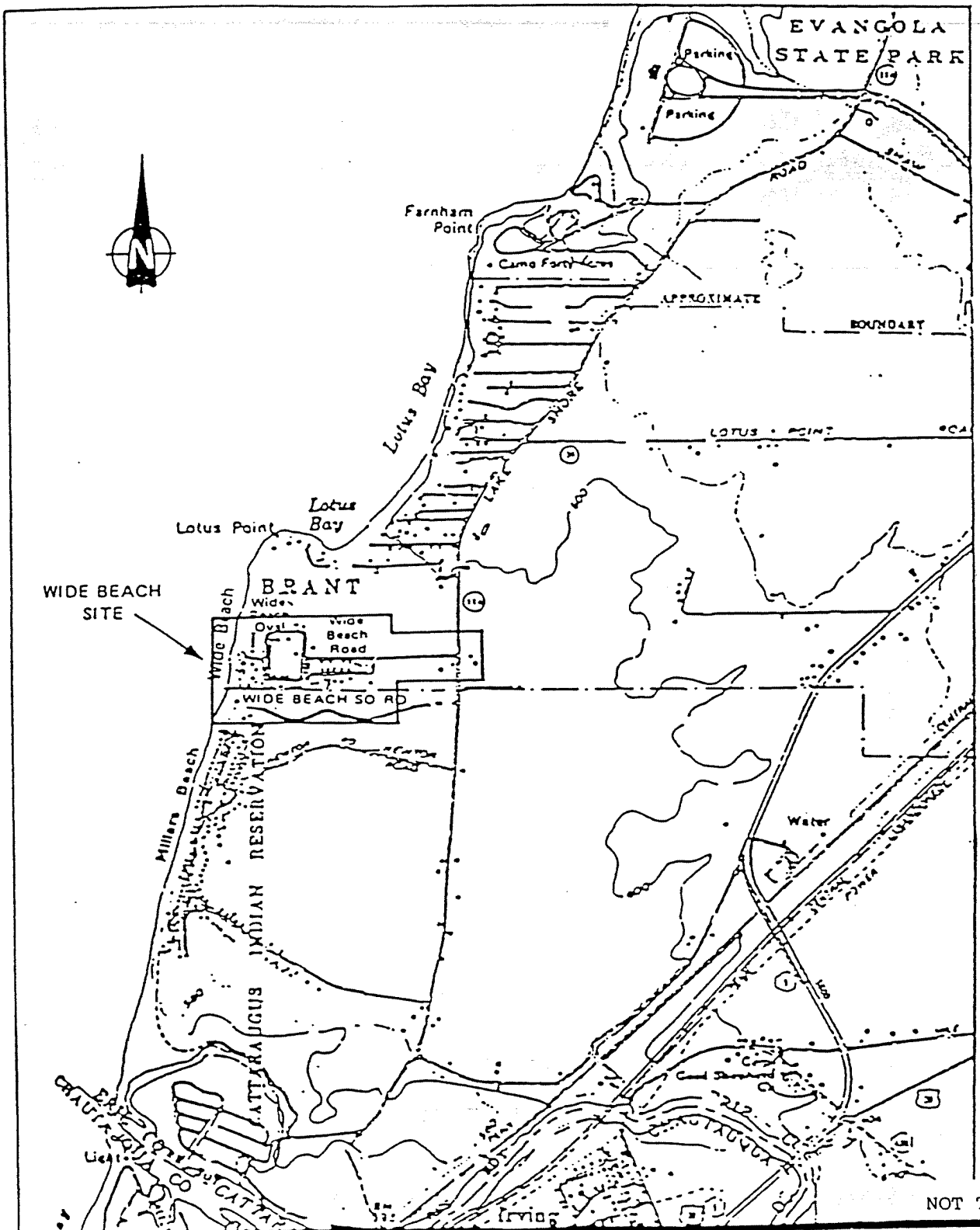
A Remedial Investigation Report (RIR) prepared for the New York State Department of Environmental Conservation (NYSDEC) was received March 28, 1985, by the U.S. EPA, Region II, from NYSDEC with the request that an immediate removal action be taken under the CERCL Act at Wide Beach.

Aroclor 1254, a polychlorinated biphenyl (PCB) is the primary contaminant at Wide Beach. The PCB has been identified at levels above 50 ppm in the gravel roadways, up to 0.16 ppb in domestic wellwater, up to 93 ppb in surface runoff water, up to 0.246 mg/m^3 in air and up to 770 ppm in residential vacuum cleaner dust. These high levels in the residential rugs and carpets tend to indicate a concentration of the (oily) PCB within the residences, in a manner that insures unacceptable contact with and exposure of the residents to PCB. Such exposure may result in deleterious liver, central nervous system, skin and reproductive system effects, plus a potentially elevated cancer risk, as indicated by animal studies and human incident studies (see RIR Chapt. 7). As a result of this significant and immediate threat to human health, an immediate removal action under CERCLA is recommended to protect the threatened residents.

The Department of Health and Human Services' Center for Disease Control (CDC) has reviewed the available data regarding Wide Beach and urges advancement of the schedule for mitigative action at the site. A copy of the CDC letter is attached hereto.



WESTON	SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPA PM Robert M. Cobiella	FIGURE 1
In association with ICF, Inc., Jacobs Engineering, Inc., & Tetra Tech, Inc		TAT PM Rodolfo J. Hafner	LOCATION MAP



WESTON SPILL PREVENTION & EMERGENCY RESPONSE DIVISION		EPA PM Robert M. Cobiella	FIGURE 2; SITE MAP
In association with ICF, Inc., Jacobs Engineering, Inc., & Tetra Tech, Inc		TAT PM Rodolfo J. Hafner	Wide Beach Town of Brant

II. BACKGROUND:

A. Site Setting and Description:

Wide Beach is a 55 acre suburban residential development on the Lake Erie shoreline in the Town of Brant. The site includes 60 homes, with an approximate winter population of 45 persons, swelling to a summer high of 120 residents.

The site is quite flat, comprising a long east-west area with short side along the Lake Erie shore, one access road (Fox Street) from Old Lake Shore Road, an oval near the beach and one side street (South Street). The roads were originally, and are still, gravel surfaced. It is bounded on the south by the Cattaraugus Indian Reservation and on the north by the Lotus Point development.

Sampling on the site was initiated by Erie County in the Fall of 1981. High PCB levels in the road beds were then confirmed by EPA's Region II Field Investigative Team (FIT) 1983 sampling program and further confirmed by EA Engineering in August, 1984, during the remedial investigation phase of this project. The problem was slated for remedial action under CERCLA.

B. Quantity and Types of Substances Present:

PCB (Aroclor 1254) is the major contaminant found on this site. It is estimated that between 27,500 and 41,000 gallons of waste oil were applied to the gravel roads at Wide Beach.

The oil was intended to control dust. It appears that part, if not all, the waste oil used was heavily contaminated with PCB. Two drums of oil found on-site in 1981 were sampled and found to contain up to 28 ppm PCB.

PCBs are considered toxic and carcinogenic, as evidenced by the EPAs inclusion of PCB in its list of designated hazardous substances, by the EPA's publication of a low (12.5 ppb) 10 day SNARL for PCB, and by publication of initial and final cancer risk levels of 0.02 ng and 0.079 ng PCBs respectively.

C. This site is on the National Priorities List. New York State requested on March 25, 1985, that EPA undertake an immediate removal action under CERCLA at Wide Beach.

III. THREAT

A. Threat of Public Exposure:

All 47 homes sampled (vacuum dust) at Wide Beach in August, 1984 were found contaminated with PCB. PCB are believed to be entering the homes from the roads and drainage swales as airborne dust and as particulates attached to clothing, footgear and pets. It is reasonable to assume that the remaining 13 unsampled homes, being next to contaminated homes and likewise open to contamination from the same source by the same route, are also contaminated. Public exposure to PCB at this site is more than a threat; it is a certainty.

The primary route of uptake at this site is by direct indoor contact and by inhalation and ingestion of contaminated dust. As a result, water quality is not a deciding factor, although it does present a concern, relative to levels found here.

In addition to direct contact with PCB contaminated dust in rugs, carpets and air in the homes, residents are threatened by potential exposure to PCB in their yards (gardening) and PCB in road dust airborne and ingested by deposition onto food (picnics) or in outdoor air by breathing vapors or particulates.

B. Evidence Of Extent Of Release:

Since all homes sampled and all road samples taken contain PCB, the site can be considered widely contaminated. The 13 road surface samples taken in 1982 ranged from a 153.6 ppm high to a 2.3 ppm low, and averaged 56.4 ppm. Seventy-one samples from the roads, taken in 1983, all contained PCB, to a high of 226 ppm.

C. Previous Actions To Abate Threat:

Actions at this site have been confined to investigative efforts. No field action intended to mitigate the contamination has been initiated.

D. Remedial Action:

A Remedial Program is underway for Wide Beach, and the Remedial Investigation Study is complete. The feasibility study is currently scheduled to be completed by July, 1985, and remedial action can be

expected to start about August, 1986. This schedule, while appropriate for long term mitigation, can result in re-contamination of the homes unless the source of dust is controlled.

IV. ENFORCEMENT:

Six letters requesting information have been sent out and three notice letters have been sent out to Wide Beach Homeowners' Assn., Niagara Transformer Corporation and one transporter. It is anticipated that new notice letters will be sent in the near future.

V. PROPOSED ACTION AND COSTS:

A. Objective Of The Action:

The proposed removal action is intended to limit or reduce the residents' exposure to PCB. Since the routes of contaminant uptake available at this site include air, water and direct contact, mitigation of the threat requires that all three routes be considered.

B. Alternatives For Action:

The primary source of PCB at Wide Beach is the road system. Full mitigation of the threat from this source might involve removal of the entire roadbed, drainage swales, driveway surface and portions of some front yards, disposal of the contaminated material and replacement of the removed facilities. Since the areal extent of the above is on the order of 20,000 sq. yds., and the depth of excavation can be assumed to be 24", the material to be removed should be about 13,335 cubic yards, or about 30,000 wet tons. The cost of such action should be on the order of $6.7 million.

A second alternative involves placing 4" thick asphaltic paving on the site roads and 2" thick on parking spaces and driveways, with gravel sub-base as required, followed by decontamination of the 60 homes. The estimated cost of this action is $498,770 It is expected that this action will significantly limit/prevent migration of PCB and mitigate human exposure. It is possible that his approach may become an intergral part of the final remedial solution for Wide Beach.

Alternatives other than asphaltic paving have been considered; (1) soil cementing could be used to fix the PCB in place and prevent migration, at a cost estimated at about $600,000. This alternative has the disadvantage of being dusty work, and dispersing PCB laden dust; (2) membrane placement, either alone or in combination with asphaltic or soil cement paving, might be used to attempt to limit PCB migration, but membranes are not considered likely to withstand road traffic over a 2 year period unless used in addition to paving and at extra cost.

The above alternatives were each considered and cost estimated in a sequence beginning with removal or cover for the primary source of PCB followed by dry vacuuming, acetic acid (10%) or detergent vacuuming of the 60 homes and installation of particulate filters on the wellwater supplies.

The selections of alternatives for this action have been discussed with other OSCs, with Remedial Action personnel, with the ERCS contractor, with NYSDEC, with the CDC representative and with the U.S. Army COE Superfund Branch in Kansas City, Mo.

C. Recommended Action:

Asphaltic paving on all roadways (3"), paths (2"), driveways and parking spaces (2"), over existing or added gravel base material; followed by dry vacuuming all 60 homes, cleaning all rugs and carpets; replacement of all air conditioning filters and installation of dual cartridge particulate filters on all wellwater supply systems is the recommended course for a removal action at Wide Beach.

D. Estimated Costs:

From the plot plan of the Wide Beach development prepared for NYSDEC by EA Engineering, confirmed by the OSC's visual inspection of 4/12 and 4/13/85, the estimated units of work and cost are as follows:

1.	Road paving, 13,000 s.y. @ $8.613/s.y.=	$ 111,970
2.	Emulsion seal, 20,000 s.y. @ $1.38 =	27,600
3.	Road gravel, 1,300 s.y. @ $1.20 =	1,560

4.	Driveway paving, 7,000 s.y. @ $3.50	=	$ 24,500
5.	Driveway gravel, 7,000 s.y. @ $1.20	=	8,400
6.	House cleaning, 60 ea. @ $555	=	33,300
7.	Particulate filters, 60 ea. @ $100	=	6,000
	SUBCONTRACT SUBTOTAL	=	$ 213,330
8.	ERCS labor + 15% O.T.	=	44,550
9.	ERCS equipment	=	15,000
10.	ERCS hazmat and perdiem costs	=	26,000
11.	ERCS subcontract 8% override	=	17,070
12.	Mobilize and demobilize	=	2,000
	CONTRACT FUNDING SUBTOTAL (BARE)	=	$ 317,950
13.	Extramural (TAT) wages	=	40,000
14.	Extramural travel	=	4,190
15.	EPA COSTS		15,000
	ESTIMATE SUBTOTAL	=	$ 377,140
16.	Known contingencies (15%)	=	56,570
	ESTIMATE SUBTOTAL		$ 433,710
17.	Unknown contingencies (15%)		65,060
	ESTIMATED TOTAL COST		$ 498,770

Costs for disposal of dust are included in Item #6, above.

E. Schedule:

The field action can be initiated within ten days of approval of fund authorization. Paving of roads can be completed within a seven week period. Paving on driveways, paths and parking locations is scheduled complete within nine weeks of field action start. Household cleaning and filter installation should be complete and the field action concluded with twelve weeks of field start.

A prerequisite for successful completion of the work items scheduled will be timely agreement by the homeowners to allow and facilitate access to their properties.

It is anticipated that agreement will be reached with local or county government to provide short-term maintenance of the new pavement pending start of a remedial action.

VI. RECOMMENDATIONS:

Conditions at Wide Beach meet the criteria for an immediate removal under 40 CFR 300.65(a) of the National Oil and Hazardous Substance Contingency Plan in that the

existing documented contamination of private residences and properties by Aroclor 1254 at unacceptably high levels presents an immediate and significant risk to human health.

Responsible parties identified to date have not come forward to provide an adequate measure of protection to the public. Immediate response assistance will not be otherwise provided on a timely basis.

Since conditions at the site meet the NCP Section 300.65 criteria for an Immediate Removal, I recommend your approval of this immediate removal request to allow completion of this action at Wide Beach, Town of Brant, Erie County, New York. The estimated cost of this action is $498,770, of which $420,490 (contingencies included) are estimated mitigation contract costs.

Your authority to approve these funds is pursuant to Alvin Alm's April 14, 1984 memorandum, Delegation Number 14-1-A.

Disapproval:_____ Date:_____

Approval:_____ Date:_____

To Be Issued Upon Approval:

cc: W. Librizzi, 2ERR
F. Rubel, 2ERR-RP
G. Zachos, 2ERR-RP
R. Ogg, 2ERR-SIC
G. Pavlou, 2ERR-NYCRA
J. Marshall, 20EP
W. Mugdan, 20RC-WTS
R. Gherardi, 20PM-FIN
S. Wolfe, 2IG
P. Flynn, WH-548B (EXPRESS MAIL)
T. Fields, WH-548
W. Hedeman, WH-548
N. Nosenchuck, NYSDEC

Appendix B

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

EPA DELIVERY ORDER FOR EMERGENCY RESPONSE CLEANUP SERVICES

(This delivery order is issued subject to all terms and conditions of the contract identified in Block 2.)

1. DATE OF ORDER	2. CONTRACT NUMBER	3. ORDER NUMBER
9/29/86	68-01-6893	6893-02-065

4. TIME OF INITIAL ORDER *(If initial order was verbal) (Specify Time Zone)*	5. DELIVERY ORDER CEILING AMOUNT *(Obligated Amount)*
9/29/86 ☐ AM 1400 ☒ PM	$30,000

6. ACCOUNTING AND APPROPRIATION DATA

Appropriation Number	Document Control No.	Account Number	Object Class
68/20X8145	KCS375	PSFA02KE46	25.35

7a. ISSUED TO: CONTRACTOR *(Name, Address, and ZIP Code)*	8a. ISSUED BY: ORDERING OFFICE *(Name, Address, and ZIP Code)*
O.H. Materials P.O. Box 551 Findlay, OH 45839-0551	Response & Prevention Branch Emergency & Remedial Response Divis. U.S. EPA Region II Edison, N.J. 08837

7b. PROGRAM MANAGER *(Name and Phone Number)*	8b. EPA REGION/USCG DISTRICT	8c. ZONE
Robert Ohneck 800-338-4508	2	I

7c. RESPONSE MANAGER *(Name and Phone Number)*	8d. ON-SCENE COORDINATOR *(Name and Phone Number)*
John Copus 800-338-4508	Robert M. Cobiella (201)321-6646

9. RESPONSE LOCATION *(Site Name and/or Address and ZIP Code)*	10. CONTRACTOR REQUIRED ON SITE *(Date and Time) (Specify Time Zone)*	11. REQUIRED WORK COMPLETION DATE
Wide Beach Community Town of Brant Erie County New York	To be arranged ☐ AM ☐ PM	December 12, 1986

12. STATEMENT OF WORK

The Contractor shall furnish the necessary personnel, materials, services, facilities, and otherwise do all things necessary for or incident to the performance of the work set forth below:

Refurbish the storm drain system running from the intersection of South Street and Oval South to the swamp, and composed of 8"Ø V.C. pipe and two manholes/catch basins. Refurbishment shall consist of unclogging the pipe(by rotary cutter), repairing the pipe if required, replacing the two catch basins, and providing secure(locking) frames and covers on each to prevent unwitting public contact with PCB contaminated silt. Pumping may be required during all or part of this work.

13. ORDERING OFFICER

NAME/TITLE	SIGNATURE	DATE
Robert M. Cobiella On-Scene Coordinator	Robert M. Cobiella	9/29/86

EPA Form 1900-59 (11-83)

CONTRACTING OFFICER

Appendix C

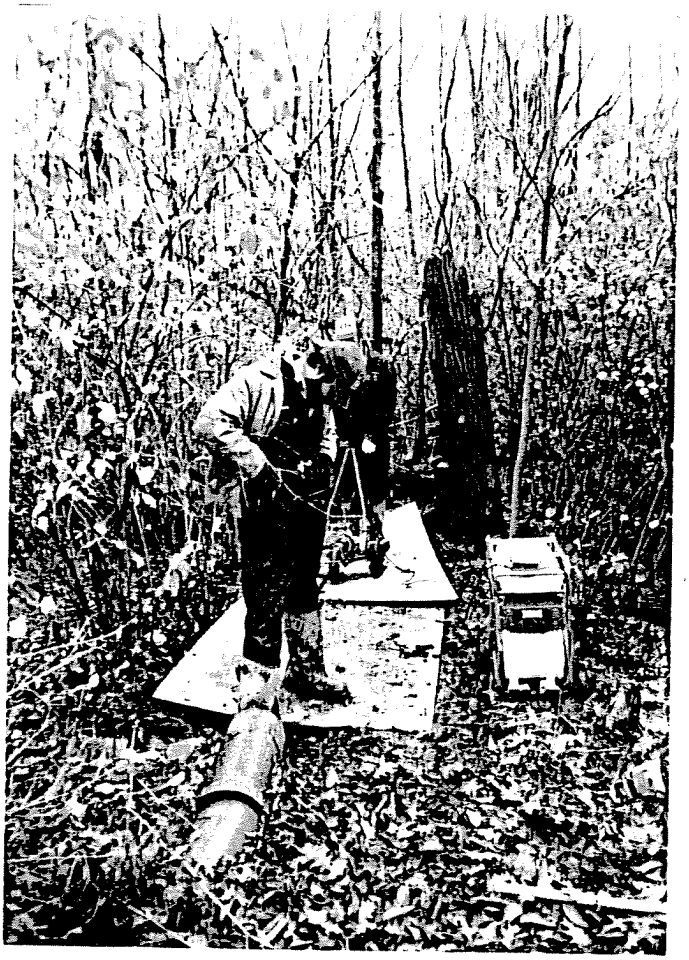


Photo #1 Roto Rooter cleaning of 8 inch pipe draining into swamp area.

Photo #2 Cutting concrete plug out of 8 inch drain to enable area drainage. Photo looks north.

Photo #3 Refurbished 8 inch drain. Existing sampling well is left of the drain. Photo looks north.

Photo #4 Finished northwest corner of south street showing one of the new manholes, drainage ditch and newly sodded area. Photo looks north.

Appendix D

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: October 8, 1986

Region II
Response and Prevention Branch
Edison, New Jersey 08837

201-548-8730 - Commercial & FTS
24-Hour Emergency

TO: C. Daggett, EPA II
J. Marshall,EPA II
S. Luftig, EPA II
F. Rubel, EPA II
G. Zachos, EPA II
B. Sprague, EPA II
M. Randol, EPA II
G. Pavlou, EPA II
S. Dorrler, ERT
ERD Washington (FAX)
NRT
N.Nosenchuck, NYSDEC
TAT

POLREP NO: 12
INCIDENT/SITE NO: 46
POLLUTANT: PCB (Aroclor 1254)
CLASSIFICATION: NPL Site
SOURCE: Wide Beach Community
LOCATION: Town of Brant, Erie County, N.Y.
AMOUNT: Unknown
WATER BODY: Not Applicable

1. SITUATION/ACTION TAKEN:

A. The Environmental Protection Agency (EPA) initiated a CERCLA removal action in May, 1985, for the purpose of protecting the residents of Wide Beach from potential significant adverse health risk resulting from direct contact with extremely high (up to 1000 ppm) concentrations of PCB (Aroclor 1254) present on site. Section 104 (c) of CERCLA, and Section 300.65 (b) (3) of the NCP limit Federal removal actions to six months in duration. Since the initial removal action at the Wide Beach site began in mid-May, 1985, the six month time frame, therefore, expired approximately mid-November, 1985.

B. A portion of the removal action, as originally planned, was the refurbishment of the existing site storm drainage system. The rationale for this work was that severe ponding could lift PCB contaminated soil from unpaved areas and could transport PCB in dust onto paved areas and into water supply wells. This rationale is still valid.

C. All but one of the existing site storm drains were refurbished. The storm drain that remains non-functional is, unfortunately, the outfall piping draining a sizeable portion of the site, leading from the corner of South Street, at Oval, south to the swamp. The disabled portion of the outfall line is on the property of a homeowner (Mr. Rusch) who, during the removal action, refused EPA access to his property to refurbish the drain. As a result, storm water ponds in the area upstream of the clogged drain, flood-

ing portions of Fox and South streets and the Oval, and of the front, side and back yards at the Grabenstaater and Hellman homes. The water wells at both these homes are thus also threatened.

D. At the request of NYSDEC, an Action Memorandum was prepared requesting reauthorization of funding, and exemption from the Six-month CERCLA time limit, in order to enable removal action in defense of public health, to refurbish the non-functional drain. This Action Memorandum was approved by the Regional Administrator on July 15, 1986. Field activity can not start on-site until guaranteed access to the Rusch property has been obtained. Total funding reauthorized is $40,000, of which $30,000 is for estimated mitigation contracting.

E. NYSDEC, by certified letter dated September 9, 1986, has served notice on the Ruschs that, under the provisions of the Environmental Conservation Law and the Eminent Domain Procedure Law of the State of New York, DEC will enter the Rusch property, to mitigate a significant environmental hazard, at any time on or after October 1, 1986.

F. On this basis, the EPA OSC has notifed the ERCS Contractor, obligated $30,000 for the work to be done via Delivery Order No. 6893-02-065, and processed the required Procurement Request, all as of September 29, 1986. The contractor, O.H.Materials Co., has been required to make the necessary arrangements to start work on-site during the last week of October, 1986. In addition, the OSC has arranged to have a NYSDEC conservation officer present during the refurbishment work in order to enforce the right of entry.

II. FINANCIAL SITUATION

A. Total Funds Originally Authorized	$ 820,770
1. Mitigation Contract Authorized Funding	742,490
B. Expenditures for Mitigation Contracting	
1. Obligated to OH Materials (KCS471)	317,950
2. Expended KCS471 Funds	317,950
3. Balance of KCS471 Funds	-0-
4. Obligated to OH Materials (KCS485)	322,000
5. Expended KCS485 Funds	322,000
6. Balance of KCS485 Funds	-0-
7. Obligated to OH Materials (KCS499)	30,000
8. Expended KCS499 Funds	22,139
9. Balance of KCS499 Funds	7,861

C. Unobligated Authorized Funding	72,540
D. Estimated Total Expenditure Thru 9/20/85 (Delivery Order No. 6893-02-023)	662,089
E. Extramural (TAT) Estimated Costs	57,725
F. Intramural EPA Estimated Costs	18,500
G. Total Estimated Expenditure, Phase I and % of $1,000,000	$ 738,314 (73.8%)
H. Funding Reauthorization of July 15, 1986	$ 40,000
1. Mitigation Contract Reauthorized Funding	30,000
I. Expenditures For Phase II Mitigation Contracting	
1. Obligated to OH Materials (KCS375)	30,000
2. Expended KCS375 Funds	-0-
3. Balance of KCS375 Funds	30,000
J. Unobligated Reauthorized Phase II Funding For Mitigation Contracting	-0-
K. Phase II Extramural Costs to Date	-0-
L. Estimated Phase II EPA Costs to Date	200
M. Estimated Total (Phase I and Phase II) Mitigation Contracting Cost to Date	662,089
N. Estimated Total (Phase I and Phase II) Extramural (TAT) Cost to Date	57,725
O. Estimated Total (Phase I and Phase II) EPA Cost to Date	18,700
P. Total Estimated Expenditure (Phase I and Phase II) to Date and % of $1,000,000	738,514 (73.9%)

III. FUTURE PLANS AND RECOMMENDATIONS

A. Proceed to mobilize the contractor on-site.

B. Refurbish the storm drain system as planned and authorized.

C. Demobilize the contractor upon completion of the authorized action.

FINAL POLREP_____ FURTHER POLREPS FORTHCOMING X

SUBMITTED BY Robert M. Cobiella

Robert M. Cobiella
On-Scene Coordinator
Response & Prevention Branch

DATE RELEASED 10/10/86

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: November 4, 1986

Region II
Response and Prevention Branch
Edison, New Jersey 08837

201-548-8730 - Commercial & FTS
24-Hour Emergency

TO: C. Daggett, EPA II
J. Marshall,EPA II
S. Luftig, EPA II
F. Rubel, EPA II
G. Zachos, EPA II
B. Sprague, EPA II
M. Randol, EPA II
G. Pavlou, EPA II
S. Dorrler, ERT
ERD Washington (FAX)
NRT
N.Nosenchuck, NYSDEC
TAT

POLREP NO: 13
INCIDENT/SITE NO: 46
POLLUTANT: PCB (Aroclor 1254)
CLASSIFICATION: NPL Site
SOURCE: Wide Beach Community
LOCATION: Town of Brant, Erie County, N.Y.
AMOUNT: Unknown
WATER BODY: Not Applicable

1. SITUATION:

A. At the request of NYSDEC, an Action Memorandum was prepared requesting reauthorization of funding, and exemption from the six month CERCLA time limit, for the refurbishment of a storm drain which was deliberatly disabled by a resident of the site (Mr. Rusch). This event occurred before the initial removal action was completed.

B. The non-functional storm drain is, unfortunately, the outfall piping draining a sizeable portion of the site. As a result, storm water ponds in the area upstream of the clogged drain, flooding nearby properties and threatening water wells in that area.

C. Since Mr. Rusch had continually denied EPA access to his property, legal actions were initiated against him. NYSDEC, by certified letter dated September 9, 1986, served notice on the Ruschs that, under the provisions of the Environmental Conservation Law and the Eminent Domain Procedure Law of the State of New York, DEC will enter the Rusch property, to mitigate a significant environmental hazard, at any time on or after October 1, 1986.

D. On this basis, the EPA OSC has notified the ERCS Contractor, obligated $30,000 for the work to be done via Delivery Order No. 6893-02-065, and processed the required Procurement Request, all as of September 29, 1986. The contractor, O.H. Materials Co., has been required to make the necessary arrangements to start work on-site during the last week of October, 1986.

In addition, the OSC has arranged to have a NYSDEC conservation officer present during the refurbishment work in order to enforce the right of entry.

II. ACTION TAKEN:

A. On October 29, 1986, a site survey was held to plan out phase II of the cleanup operation. Members of EPA, TAT, NYSDEC and ERCS were in attendence. NYSDEC conservation officers were also present to insure that the Rusch family did not impede cleanup activities.

B. Following EPA/TAT efforts to locate suppliers of the necessary drainage materials (e.g. manholes, manhole covers etc.) it was agreed that mobilization would be on November 4, 1986.

III. FINANCIAL SITUATION

A. Total Funds Originally Authorized	$ 820,770
1. Mitigation Contract Authorized Funding	742,490
B. Expenditures for Mitigation Contracting	
1. Obligated to OH Materials (KCS471)	317,950
2. Expended KCS471 Funds	317,950
3. Balance of KCS471 Funds	-0-
4. Obligated to OH Materials (KCS485)	322,000
5. Expended KCS485 Funds	322,000
6. Balance of KCS485 Funds	-0-
7. Obligated to OH Materials (KCS499)	30,000
8. Expended KCS499 Funds	22,139
9. Balance of KCS499 Funds	7,861

10.	Unobligated Authorized Funding	72,540
11.	Estimated Total Expenditure Thru 9/20/85 (Delivery Order No. 6893-02-023)	662,089
12.	Extramural (TAT) Estimated Costs	57,725
13.	Intramural EPA Estimated Costs	18,500
14.	Total Estimated Expenditure, Phase I and % of $1,000,000	$ 738,314 (73.8%)
15.	Funding Reauthorization of July 15, 1986	$ 40,000
	a. Mitigation Contract Reauthorized Funding	30,000
16.	Expenditures For Phase II Mitigation Contracting	
	a. Obligated to OH Materials (KCS375)	30,000
	b. Expended KCS375 Funds	-0-
	c. Balance of KCS375 Funds	30,000
17.	Unobligated Reauthorized Phase II Funding For Mitigation Contracting	-0-
18.	Phase II Extramural Costs to Date	-0-
19.	Estimated Phase II EPA Costs to Date	1,265
20.	Estimated Total (Phase I and Phase II) Mitigation Contracting Cost to Date	662,089
21.	Estimated Total (Phase I and Phase II) Extramural (TAT) Cost to Date	59,165
22.	Estimated Total (Phase I and Phase II) EPA Cost to Date	19,765
23.	Total Estimated Expenditure (Phase I and Phase II) to Date and % of $1,000,000	741,019 (74.1%)

IV. FUTURE PLANS AND RECOMMENDATIONS

A. Proceed to mobilize the contractor on-site.

B. Phase II will consist of the following:

1. Clearing the existing storm drain line of debris and repairing it as needed.

2. Installing two complete manhole assemblies on this storm line. One of these manholes will be on the Rusch property.

3. Placing an adjusting ring on another manhole cover so that it matches the existing pavement.

C. Demobilize the contractor upon completion of the authorized action.

FINAL POLREP_____ FURTHER POLREPS FORTHCOMING X

SUBMITTED BY Robert M. Cobiella
Robert M. Cobiella
On-Scene Coordinator
Response & Prevention Branch

DATE RELEASED 11/6/86

U.S. ENVIRONMENTAL PROTECTION AGENCY

POLLUTION REPORT

DATE: December 17, 1986

Region II
Response and Prevention Branch
Edison, New Jersey 08837

201-548-8730 - Commercial & FTS
24-Hour Emergency

TO: C. Daggett, EPA II
J. Marshall,EPA II
S. Luftig, EPA II
F. Rubel, EPA II
G. Zachos, EPA II
B. Sprague, EPA II
M. Randol, EPA II
G. Pavlou, EPA II
S. Dorrler, ERT
ERD Washington (FAX)
NRT
N.Nosenchuck, NYSDEC
TAT

POLREP NO: 14
INCIDENT/SITE NO: 46
POLLUTANT: PCB (Aroclor 1254)
CLASSIFICATION: NPL Site
SOURCE: Wide Beach Community
LOCATION: Town of Brant, Erie County, N.Y.
AMOUNT: Unknown
WATER BODY: Not Applicable

1. SITUATION:

A. At the request of NYSDEC, an Action Memorandum was prepared requesting reauthorization of funding, and exemption from the six month CERCLA time limit, for the refurbishment of a storm drain which was deliberatly disabled by a resident of the site (Mr. Rusch). This event occurred before the initial removal action was completed.

B. The non-functional storm drain is, unfortunately, the outfall piping draining a sizeable portion of the site. As a result, storm water ponds in the area upstream of the clogged drain, flooding nearby properties and threatening water wells in that area.

C. Since Mr. Rusch had continually denied EPA access to his property, legal actions were initiated against him. NYSDEC, by certified letter dated September 9, 1986, served notice on the Ruschs that, under the provisions of the Environmental Conservation Law and the Eminent Domain Procedure Law of the State of New York, DEC will enter the Rusch property, to mitigate a significant environmental hazard, at any time on or after October 1, 1986.

D. On this basis, the EPA OSC has notified the ERCS Contractor, obligated $30,000 for the work to be done via Delivery Order No. 6893-02-065, and processed the required Procurement Request, all as of September 29, 1986. The contractor, O.H. Materials Co., has been required to make the necessary arrangements to start work on-site during the last week of October, 1986.

In addition, the OSC has arranged to have a NYSDEC conservation officer present during the refurbishment work in order to enforce the right of entry.

II. ACTION TAKEN:

A. On November 4, 1986 the ERCS contractor was mobilized to initiate Phase II of the removal action. Several sections of the drain line were cleared before encountering the first obstruction.

B. In the presence of EPA, TAT and ERCS, Mr. Rusch freely admitted that he deliberately disabled the drain line on his property by filling it with cement. This obstruction was removed through excavation.

C. On November 5, 1986 Erie County Highway Department added an adjusting ring to one of the existing manhole covers which raised it to street level.

D. A second drain line obstruction was discovered. The source of this obstruction was a NYSDEC installed monitoring well which inadvertently intersected the buried line. The mortar used to secure the well flowed into the drain line, encompassing the entire eight inch diameter of the line, for approximately ten inches on either side of the well.

E. On November 6, 1986 the second obstruction was cleared by replacing the clogged sections of the line. New sections were installed consistent with the existing grade, by-passing the monitoring well.

F. The remaining sections of the drain line were then cleared of all debris.

G. On November 7, 1986 the complete manhole assembly was installed on the Rusch property. This consisted of a 3' x 3' x 3' concrete catch basin, a matching lid, a steel manhole cover and drain line connections. The manhole cover was locked and the perimeter sealed with cement to prevent sabotage.

H. The second manhole assembly was partially installed. Absence of the steel manhole cover delayed completion.

I. On November 20, 1986, following delivery of the cover, the second manhole assembly was completed.

J. Completed restoration work included soil removal, grading and laying 2,000 square feet of sod over disrupted areas.

III. FINANCIAL SITUATION

A. Total Funds Originally Authorized	$ 820,770
1. Mitigation Contract Authorized Funding	742,490

B. Expenditures for Mitigation Contracting

1.	Obligated to OH Materials (KCS471)	317,950
2.	Expended KCS471 Funds	317,950
3.	Balance of KCS471 Funds	-0-
4.	Obligated to OH Materials (KCS485)	322,000
5.	Expended KCS485 Funds	322,000
6.	Balance of KCS485 Funds	-0-
7.	Obligated to OH Materials (KCS499)	30,000
8.	Expended KCS499 Funds	22,139
9.	Balance of KCS499 Funds	7,861
10.	Unobligated Authorized Funding	72,540
11.	Estimated Total Expenditure Thru 9/20/85 (Delivery Order No. 6893-02-023)	662,089
12.	Extramural (TAT) Estimated Costs	57,725
13.	Intramural EPA Estimated Costs	18,500
14.	Total Estimated Expenditure, Phase I and % of $1,000,000	$ 738,314 (73.8%)
15.	Funding Reauthorization of July 15, 1986	$ 40,000
	a. Mitigation Contract Reauthorized Funding	30,000
16.	Expenditures For Phase II Mitigation Contracting	
	a. Obligated to OH Materials (KCS375)	30,000
	b. Expended KCS375 Funds	11,908
	c. Balance of KCS375 Funds	18,092

17. Unobligated Reauthorized Phase II Funding For Mitigation Contracting	-0-
18. Phase II Extramural Costs to Date	4,140
19. Estimated Phase II EPA Costs to Date	3,000
20. Estimated Total (Phase I and Phase II) Mitigation Contracting Cost to Date	673,997
21. Estimated Total (Phase I and Phase II) Extramural (TAT) Cost to Date	61,865
22. Estimated Total (Phase I and Phase II) EPA Cost to Date	21,500
23. Total Estimated Expenditure (Phase I and Phase II) to Date and % of $1,000,000	757,362 (75.7%)

IV. FUTURE PLANS AND RECOMMENDATIONS

A. Soil excavated during the removal will be drummed and moved to a storage area on site.

B. Demobilize ERCS upon completion of the authorized action.

FINAL POLREP_____ FURTHER POLREPS FORTHCOMING X

SUBMITTED BY Mark P. Pane for
Robert M. Cobiella
On-Scene Coordinator
Response & Prevention Branch

DATE RELEASED 12/18/86

LAST POLREP IS UNAVAILABLE

Appendix E

TAT-02-F-01418

COMMUNITY RELATIONS PLAN

PCB CONTAMINATION SITE

WIDE BEACH, NEW YORK

Prepared By:
Chris Marlowe
Weston/SPER Division
Edison, New Jersey 08837

Prepared For:
Robert M. Cobiella, OSC
Emergency and Remedial Response Division
Response and Prevention Branch, U.S. EPA
Site Mitigation Section
Edison, New Jersey 08837

COMMUNITY RELATIONS PLAN

WIDE BEACH PCB CONTAMINATION SITE

TOWN OF BRANT, ERIE COUNTY, NEW YORK

I. BACKGROUND AND KEY ISSUES:

A. Site Setting and Description:

Wide Beach is a 55 acre suburban residential development on the Lake Erie shoreline in the Town of Brant. The site includes 60 homes, with an approximate winter population of 45 persons, swelling to a summer high of 120 residents.

The site is quite flat, comprising a long east-west area with short side along the Lake Erie shore, one access road (Fox Street) from Old Lake Shore Road, an oval near the beach and one side street (South Street). The roads were originally, and are still, gravel surfaced. It is bounded on the south by the Cattaraugus Indian Reservation and on the north by the Lotus Point development.

Sampling on the site was initiated by Erie County in the Fall of 1981. High PCB levels were identified and confirmed by EPA's Region II Field Investigative Team (FIT) 1983 sampling program and further confirmed by EA Engineering in August, 1984.

B. Quantity and Types of Substances Present:

Aroclor 1254, a polychlorinated biphenyl (PCB), is the major contaminant found on this site. It is estimated that between 27,500 and 41,000 gallons of waste oil were applied to the gravel roads at Wide Beach.

The oil was intended to control dust. It appears that part, if not all, of the waste oil used was heavily contaminated with PCB. Two drums of oil found on-site in 1981 were sampled and found to contain up to 28 ppm PCB.

C. This site is on the National Priorities List.

II. THREAT

A. Threat of Public Exposure:

PCB enters the homes attached to footgear, clothing and pets, and as airborne dust. The roads and drainage swales on the site are the source.

All 47 homes sampled (vacuum dust) at Wide Beach in August, 1984, were found contaminated with PCB. It is reasonable to assume that the remaining 13 unsampled homes, being next to contaminated homes and likewise open to contamination from the same source by the same route, are also contaminated. Public exposure to PCB at this site is more than a threat; it is a certainty.

In addition to direct contact with PCB in rugs, carpets and air in the homes, residents are threatened by potential exposure to PCB in their yards (gardening) and PCB in road dust outdoors, airborne and ingested by deposition onto food (picnics) or in outdoor air by breathing vapors or particulates.

B. Evidence Of Extent Of Release:

Since all homes sampled and all road samples taken contain PCBs, the site can be considered widely contaminated. The 1982 road surface samples ranged from a high of 153.6 ppm to a low of 2.3 ppm, and averaged 56.4 ppm. Seventy-one samples from the roads, taken in 1983, all contained PCB, with a highest concentration of 226 ppm, see Figure 3.

C. Previous Actions To Abate Threat:

Actions at this site have been confined to investigative efforts involving sampling actions. No field action intended to mitigate the contamination has been initiated.

III. PROPOSED ACTION:

A. Objective Of The Action:

The proposed removal action is intended to limit or reduce the residents' exposure to PCB. Since the routes of contaminant uptake available at this site include air, water and direct contact, mitigation of the threat requires that all three routes be considered.

B. Alternatives For Action:

The primary source of PCB at Wide Beach is the road system. Full mitigation of the threat from this source might involve removal of the entire roadbed, drainage swales, driveway surface and portions of some front yards, disposal of the contaminated material and replacement of the removed facilities. Since the areal extent of the above is on the order of 20,000 sq. yds., and the depth of excavation can be assumed to be 24", the material to be removed should be about 13,335 cubic yards, or about 30,000 wet tons. The cost of such action should be on the order of $6.7 million. Mitigation without removal is a second alternate action. This alternative involves placing asphaltic paving on all roads, driveways and parking areas, with gravel sub-base provided as required. The estimated cost of this alternative is $435,100.

Alternatives other than asphaltic paving have been considered; (1) soil cementing could be used to fix the PCB in place and prevent migration, at a cost estimated at about $600,000. This alternative has the disadvantage of creating, and dispersing PCB laden dust; (2) membrane placement, either alone or in combination with asphaltic or soil cement paving, might be used to attempt to limit PCB migration, but membranes are not considered likely to withstand road traffic over a 2 year period.

The above alternatives were each considered and cost estimated in a sequence beginning with removal or cover for the primary source of PCB followed by vacuuming of the 60 homes and installation on the wellwater supplies.

C. Recommended Action:

Asphaltic paving on all roadways (3"), paths (2"), driveways and parking spaces (2"), over existing or added gravel base material; followed by dry vacuuming all 60 homes, cleaning all rugs and carpets; replacement of all air conditioning filters and installation of dual cartridge particulates filters on all wellwater supply systems is the recommended course for removal action at Wide Beach.

D. Objectives of the Community Relations Plan:

The plan is designed to:

1. Provide accurate understandable information to local citizens, elected officials, and the media.
2. Integrate the local government, State and Federal response.
3. Assist public acceptance of the chosen response actions.
4. Enlist the assistance of local officials, as needed.

The officials and groups for whom this plan is designed are: local citizens, citizens groups, school principals, local businesses, elected officials, local, State, and Federal agencies working in association with Region II EPA.

The information will be supplied by EPA's Office of External Programs, New York City with the cognizance of the Office of the Regional Administrator.

C. Community Relations Activities:

TIME	ACTIVITY	PURPOSE	STAFF	HOURS
Upon authorization of funding	1. Meeting with State and local officials	To discuss community relations needs	OSC OEP Rep TAT*	24 24 24
Upon authorization of funding as needed	2. Press release	To brief community and press. Provide community with information on progress of the removal action	OSC OEP Rep	24 24

*TAT stands for the U.S. EPA authorized contractor, Technical Assistance Team, Roy F. Weston, Inc.

TIME	ACTIVITY	PURPOSE	STAFF	HOURS
	3. Fact sheet	To provide information for affected/interested public on activity at key decision points	OSC OEP Rep	24 24
	4. Briefings	To inform State and local officials about on-going developments at the site	OSC OEP Rep	24 24
	5. Public meetings	To discuss the need for response and review key decision points, explain the clean up method and respond to citizen concerns	OSC OEP Rep	24 24
When system operating	6. Site tours	Local elected officials, local and State government officials	OSC	24

D. List of Key Officials and Contacts:

Federal Agencies	Telephone
EPA Site Mitigation Section	
Robert Cobiella, OSC	(201) 321-6646
EPA Office of External Programs	
Jim Marshall	(212) 264-4913
Rich Cahill	(212) 264-8504
Herman Phillips	(212) 264-1044
Lillian Johnson	(212) 264-2515
Federal Officials	
Senator Alfonse M. D'Amato	(202) 224-6542 (518) 463-2244
Senator Daniel P. Moynihan	(202) 224-4451 (212) 661-5150
Federal Officials	
Representative Jack W. Kemp	(716) 846-4123
New York State Agencies	
New York State Department of Environmental Conservation	
Hazardous Waste Program (Inland Albany Office)	(518) 457-9538
Hazardous Waste Program (Region 9)	(716) 847-4590
New York State Department of Health	(716) 847-4500
New York State Police	(716) 373-2550
New York State Officials	
Senator Willam Stokowski	(716) 826-3344
Assemblyman Frances Pardum	(716) 826-1878
Erie County Agencies	
Health Department	(716) 649-4225
Erie County Officials	
County Executive Edward Rutkowski	(716) 846-8500

Town of Brant

Supervisor Willam A. Fricano		(716) 549-0282
Highway Department		(716) 549-4770
Fire Department	(Emergency)	(716) 549-3600
	(David Piro)	(716) 549-3103
Police	(Emergency)	(716) 549-3600
	(Chief)	(716) 549-4040

Media Contacts

Buffalo Evening News Burton Freed	(716) 372-8375
Evans Journal	(716) 549-1234

Appendix F

General Site Safety Plan
Weston/SPER Division

PCB Cleanup
Wide Beach Site
Wide Beach, New York

Region II
TDD #2-8504-10
April 26, 1985

TABLE OF CONTENTS

A. INCIDENT DESCRIPTION

1. Name of Site:

Wide Beach Site
EPA ID #46
Wide Beach, New York

2. Type of Incident:

Recent sampling at the site uncovered contamination of the area by PCBs.

3. Response Objectives:

TAT personnel on stand-by for potential Immediate Removal Action, air mnitoring and sampling support at this site. TAT would monitor contractor activity during Removal Action.

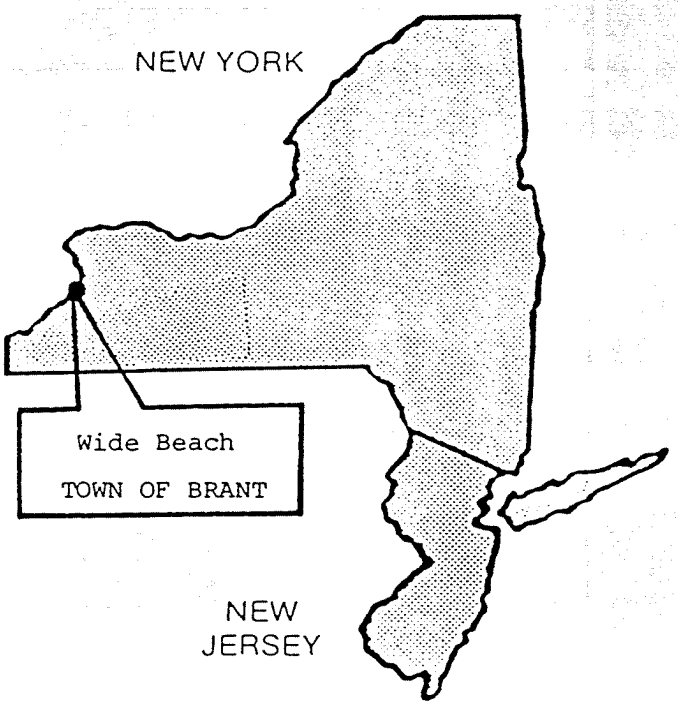
All persons coming onto the Wide Beach site shall be subject to the following safety requirements, at the direction of the OSC. No one, whether federal, state, or contractor employee shall be required to follow any directions which are in violation of their own agency or corporate safety policy.

All persons entering this site shall read this safety plan and sign the Acknowledgement Form posted in the Command Post signifying that they have read and understood the plan. All personnel on-site shall be directly responsible to the OSC and shall be subject to his orders.

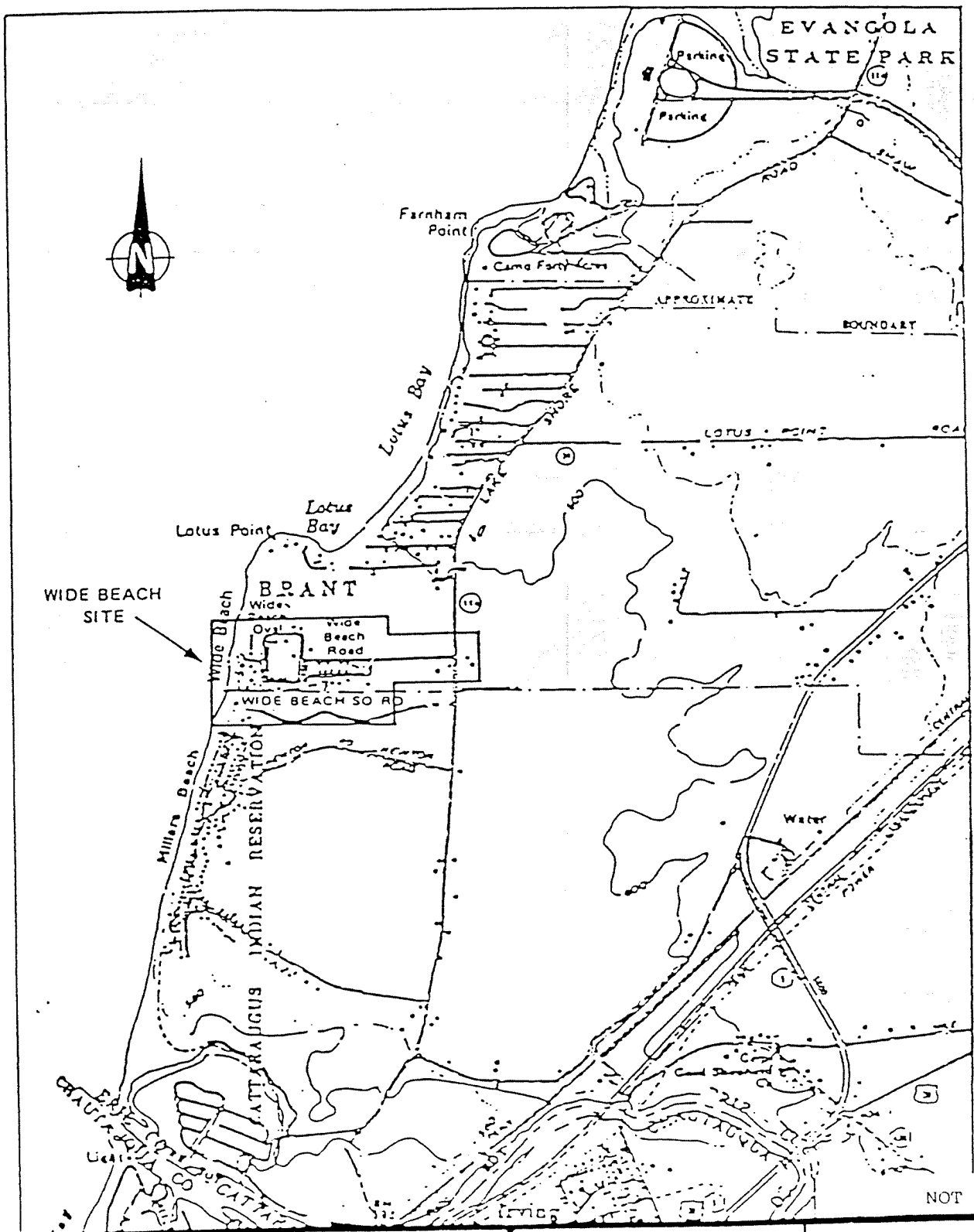
The main safety concerns on the Wide Beach site are dusts created by the cleanup effort, and dermal contact with the same materials. Heat stress is also considered to be a major health consideration at this site.

4. Hazard Level

Aroclor 1254, a polychlorinated biphenyl (PCB) is the primary contaminant at Wide Beach. The PCB has been identified at levels above 50 ppm in the gravel roadways, up to 0.16 ppb in domestic wellwater, up to 93 ppb in surface runoff water, up to 0.246 mg/m^3 in air and up to 770 ppm in residential vacuum cleaner dust. These high levels in the residential rugs and carpets tend to indicate a concentration of the (oily)



WESTON	SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPA PM Robert M. Cobiella	FIGURE 1
In association with ICF, Inc., Jacobs Engineering, Inc., & Tetra Tech, Inc.		TAT PM Rodolfo J. Hafter	LOCATION MAP



WESTON	SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPA PM: Robert M. Cobiella	FIGURE 2; SITE MAP
In association with: ICF Inc., Jacobs Engineering, [illegible] Scientech Inc.		[illegible]: Robert J. Hafner	Wide Beach Town of Brant

PCB within the residences, in a manner that insures unacceptable chronic contact with and exposure of the residents to PCBs. Such exposure may result in deleterious liver, central nervous system, skin and reproductive system effects, plus a potentially elevated cancer risk, as indicated by animal studies and human incident studies (see RIR Ch. 7).

B. Site Description

1. Site/Location

Wide Beach is a 55 acre suburban residential development on the Lake Erie Shorelines in the Town of Brant. The site includes 60 homes, with an approximate winter population of 45 persons, swelling to a summer high of 120 residents.

The site is quite flat, comprising a long east-west area with a short side along the Lake Erie shore, one access road (Fox Street) from Old Lake Shore Road, an oval near the beach and one side street (South Street). The roads were originally, and are still, gravel surfaced. It is bounded on the south by the Cattaraugus Indian Reservation and on the north by the Lotus Point Development.

Sampling on the site was initiated by Erie County in the Fall of 1981. High PCB levels identified then were confirmed by EPA's Region II Field Investigative Team's (FIT) 1983 sampling program and further confirmed by EA Engineering in August, 1984.

C. MATERIAL DESCRIPTION:

1. Chemical Name:

PCBs (Aroclor 1254) is the major contaminant found on this site. It is estimated that between 27,500 and 41,000 gallons of waste oil were applied to the gravel roads at Wide Beach.

The oil was intended to control dust. It appears that part, if not all, the waste oil used was heavily contaminated with PCBs. Two drums of oil found on site in 1981 were sampled and found to contain up to 28 ppm PCBs.

2. Characteristics:

This form of PCB will remain tightly bound to the medium in which it is found, under normal conditions. Volatilization of the PCBs is very low and is not anticipated to be a major consideration in safety planning. PCBs will, however, remain attached to particles of dust and thereby become a potential respiratory or dermal hazard.

3. Toxicity:

*TLV-.5 to 1.0 mg/m^3 (dependent on chlorine content)
IDLH-5 to 10 mg/m^3 (dependent on chlorine content) *TLVs are based on a 10 hour time weighted average.

NIOSH has recommended that PCBs be treated as an occupational carcinogen.

4. Exposure Symptoms:

Immediate results of PCB exposure are irritations of the eyes or skin. Itching, swelling, and redness of the face may occur just prior to chloracne. Symptoms such as chloracne can be passed on from an exposed person through contact with his clothing or hands, etc. Long term symptoms and effects of exposure include liver damage.

D. PERSONNEL PROTECTION:

1. Medical:

No TAT personnel will be allowed on site unless they have had a complete (Weston authorized) physical examination within the past year and have accordingly been certified for TAT work.

2. Work Site:

Personal protection and decontamination zones will be required at any time contaminated dust is expected to be created by cleanup operations. Minimal dermal protection should be utilized at all times.

Minimum dermal protection shall consist of neoprene boots, disposable booties, surgical gloves, saranex coveralls, and neoprene or viton gloves. Contact with

contaminated material is to be avoided when at all possible.

The minimum respiratory protection allowed (when required) shall consist of NIOSH approved cartridge or canister masks equipped with approved filters which are designed for the removal of pesticides (GM pest).

3. Air Monitoring:

On the first visit before any work is done on-site, the site will be thoroughly screened for radition (Radiac) and organic vapors (HNU and OVA). Once the presence of radiation has been ruled out, periodic HNU or OVA surveys will be made of the area daily.

4. Heat Stress Monitoring:

All supervisors should ensure that their personnel are briefed on the hazards, symptoms, and treatment of heat related problems.

For monitoring the body's recuperative ability to excess heat, one or more of the following techniques should be used as a screening mechanism. Monitoring of personnel wearing impervious clothing should commence when the ambient temperature is 70°F or above. Frequency of monitoring should increase as the ambient temperture increases or as slow recovery rates are indicated. When temperatures exceed 85°F, workers should be monitored for heat stress after every work period.

a) Heart rate (HR) should 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 stays the same. If the pulse rate is 100 beats per minute at the beginning of the next rest period, the following work cycle should be shortened by 33%.

b) Body temperature should be measured orally with a clinical thermometer as early as possible in the resting period. Oral temperature (OT) at the beginning of the rest period should not exceed 99°F. If it

does, the next work period should be shortened by 10 minutes (or 33%), while the length of the rest period stays the same. However, if the OT exceeds 99.7°F at the beginning of the next period, the following work cycle should be further shortened by 33%. OT should be measured again at the end of the rest period to make sure that it has dropped below 99°F.

c) Body water loss (BWL) due to sweating should be measured by weighing the worker in the morning and in the evening. The clothing worn should be similar at both weighings; preferably the workers should be nude. The scale should be accurate to plus or minus 1/4 lb. BWL should not exceed 1.5% of the total body weight. If it does, the worker should be instructed to increase his daily intake 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 in sweat as well.

d) Good hygienic standards must be maintained by frequent change of clothing and daily showering. Clothing should be permitted to dry during rest periods. Persons who notice skin problems should immediately consult medical personnel.

Effects of Heat Stress:

If the body's physiological processes fail to maintain a normal body temperature because of excessive heat, a number of physical reactions can occur ranging from mild (such as fatigue, irritability, anxiety, and decreased concentration, dexterity, movement) to fatal. Standard reference books should be consulted for specific treatment.

Heat-Related Probems Are:

-Heat Rash: Caused by continuous exposure to heat and humid air and aggravated by chafing clothes. Decreases ability to tolerate heat as well as being a nuisance.

-Heat Cramps: Caused by profuse perspiration with inadequate fluid intake and chemical replacement (especially salts). Signs: muscle spasm and pain in the extremities and abdomen.

-Heat Exhaustion: Caused by increased stress or various organs to meet increased demands to cool the body. Signs: shallow breathing, pale, cool, moist skin, profuse sweating; dizziness and lassitude.

-Heat Stroke: The most severe form of heat stress. Body must be cooled immediately to prevent severe injury and/or death. Signs and symptoms are: red, hot, dry skin; no perspiration; nausea; dizziness; and confusion, strong, rapid pulse; and coma.

5. Wet Weather:

Wet weather operations shall require disposable rainsuits be worn by all personnel.

6. Personnel Hygiene:

No one shall be permitted to eat, drink or smoke within the site, and shall thoroughly wash hands and face with soap and water before doing so outside the site. Individuals shall wash hands with soap and water before urinating. All footwear, once worn inside the site, shall remain on site until completion of the field work. At the end of each day, disposable clothing shall be removed and disposed of in 55-gallon metal drums. Individuals are expected to thoroughly shower, as soon as possible, after leaving the job site at the end of the day.

7. Damaged Personnel Protection Equipment:

In the event clothing is ripped or torn, work shall stop and the clothing shall be removed and replaced as soon as possible. In the event of direct skin contact, the affected area shall be washed immediately with soap and water. There shall be a person stationed in the decontamination area to help people put on and remove the protective gear.

8. Exposure:

Should an exposure occur, the individual will receive medical attention and an accident report shall be filed, following guidelines set down in the Weston Health and Safety Plan.

9. Site Access:

No one shall enter on-site working areas without permission from the person in charge at the command post. Personnel manning the decontamination line are responsible to check that people entering the "hot zone" are properly dressed and those exiting the "hot zone" follow the decontamination procedures provided in the following pages.

10. Emergency Preparedness:

All Region II TAT personnel going on-site shall be familiar with the most direct route to the nearest hospital. One person in the command post shall have readily available a vehicle exclusively for emergency use. In addition, copies of the site health and safety plan will be readily accessible at the command post.

E. DECONTAMINATION PROCEDURES:

A decontamination area will be set up and all entry to and exit from the site will be through this area. In the decontamination area will be a soap and water wash and water rinse for the boots and gloves. Also, a 55-gallon drum or plastic interim container will be placed in the area for disposal of overalls and gloves. In addition, an industrial first-aid kit will be located in the decontaminatin area.

The 20 by 20 foot area located next to the command post truck is provided as a decontamination area. Individuals within the site shall remove all disposable clothing at this point before exiting the area. Because of possible dust on disposable clothing, the decontamination person shall wear protective clothing, gloves and face mask while assisting people in removal of exposed articles. All disposable items shall be placed in 55-gallon metal drums with lids.

In an effort to reduce the volume of contaminated trash and rinse water, team members are to make a conscious effort to minimize the amount of equipment and supplies brought inside the site.

All personnel entering and exiting the "hot zone" shall pass through the decontamination zone. Figure 3 provides the decontamination sequence for this site.

The personnel decontamination sequence is as follows:

a) Samples and equipment are dropped on plastic sheets.

b) At the "hot-line", exiting workers stop for personnel decontamination. Standing in a tub, booties, and saranex coveralls and outer gloves are washed with soapy water and rinsed with clean water.

c) Disposable booties and tape removed and placed in 55-gallon drums or lined garbage cans inside the "hot zone". As each booty is removed, the individual steps into the "decontamination zone". Team members will then place outer gloves into the same 55-gallon drum used for booties. Spent decontamination solutions are poured into a 55-gallon drum used solely for decon solutions.

d) Once inside the D-CON Zone, the entry team will receive a complete second detergent and clean water sponge rinse as his/her arms are held upward to prevent contamination of inner gloves.

e) The entry team member will then remove and discard the saranex coveralls.

f) The entry team member will then remove neoprene boots, mask and surgical gloves.

g) Cotton coveralls, socks, underclothing, etc. are removed in the "D-CON" side of the change house. Individuals shower, and dress on the clean side and exit site.

The procecdure for decontamination station closure shall be as follows:

a) Decontamination personnel shall be responsible for closing the station at the end of each work day.

PERSONNEL DECONTAMINATION PROCEDURE

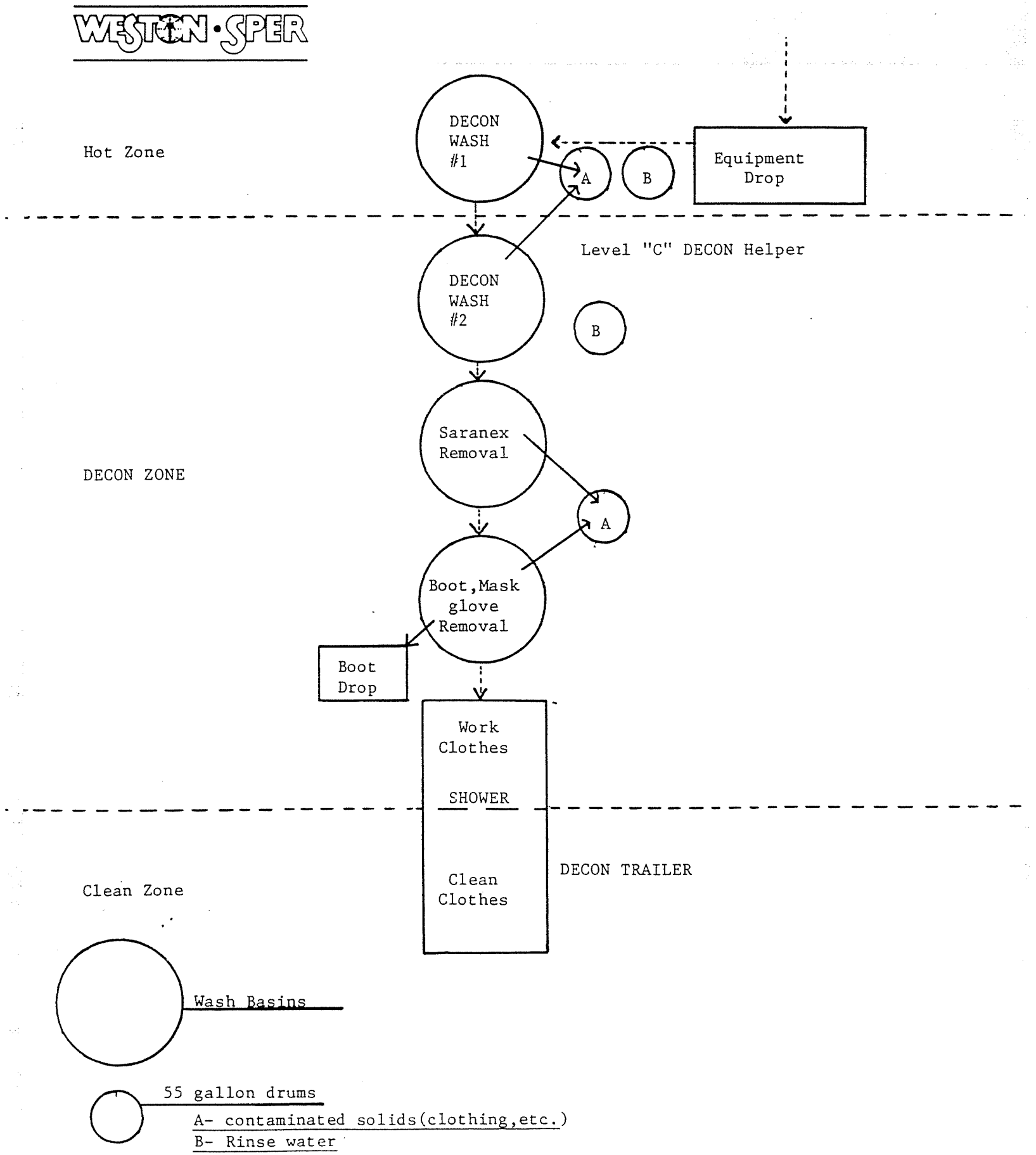


FIGURE 3

b) All solid wastes such as plastic tarps, bags, and tyveks shall be drummed in a 55-gallon drum for solids and the drum shall be closed at the end of the day.

c) All contaminated decontamination solutions shall be disposed of in a 55-gallon drum for liquids. Drums shall be closed at the end of each work day in case of rain or vandalism at night.

d) Drums shall be secured at night to prevent exposure to area residents.

e) Full drums shall be transported off-site to an appropriate disposal facility by a licensed waste hauling contractor.

F. EMERGENCY INFORMATION:

1. Site Services:

Hospital:

Ambulance: Brant Emergency Services - 716-549-3600

Police: Brant Police Department - 716-549-3600

Fire: Brant Fire Department - 716-549-3600

State Police: New York State Police - 716-373-2550

Poison Control Center:

2. Support Services:

TAT II Office : 201-225-6116

National Medical Emergency Service: 513-421-3063

NPMO Hot Line - 215-524-1925
215-524-1926

CHEMTREC: 800-424-9300

3. Route to Hospital:

SITE SAFETY PLAN ACKNOWLEDGEMENT FORM

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By placing my signature below, I certify that I have read the site safety plan, fully understand its requirements and will follow all safety directives set forth by the plan or dictated by the EPA OSC as long as I am present at this site.

NAME	DATE	TIME	REPRESENTING