

US EPA ARCHIVE DOCUMENT

SITE MANAGER REPORT
BROWNFIELDS CLEANUP REVOLVING LOAN FUND

August 31, 2001

At the completion of a BCRLF response action, the cooperative agreement recipient (lead agency) and the Brownfields Site Manager are required to develop a Site Manager Report that meets the requirements of the NCP [see 40 C.F.R. Section 300.165(b)]. The Site Manager Report is referred to as the On-Scene Coordinator Report in the NCP and as the Close Out Report in the BCRLF Administrative Manual.

The suggested outline and sample report included in this package provide information for fulfilling these requirements. Your own Site Manager Report should be prepared based on your review of the sample in combination with a review of other program information and applicable statutory and regulatory provisions. It is up to the user to review these documents carefully and determine whether they are appropriate for your program. Please note that much of the information contained in this report may be supplied by the borrower.

SUGGESTED OUTLINE FOR THE BCRLF SITE MANAGER REPORT

- **Title Page**
- **Executive Summary (Optional)**
- **Report**
- ! Summary of Events
 - A. Site Conditions and Background
 - 1. Initial situation, background, site location
 - 2. Location of any sensitive populations, habitats, or natural resources surrounding the site
 - 3. Location of hazardous substances and areas of concern on the site
 - 4. Cause of the contamination
 - B. Basis for Removal Action - Clearly describe the basis for taking this removal action. Indicate the media contaminated, and the contaminant levels compared to appropriate health-based or other relevant standards.
 - C. Summary of Removal Action
 - 1. Briefly describe the actions that were taken to address the contamination at the site (e.g., soil was excavated, fencing was installed, groundwater was pumped and treated). Indicate quantities of media addressed.
 - 2. Difficulties Encountered - If applicable, list any difficulties encountered during the cleanup, including:
 - Technical, naturally occurring, and uncontrollable items that affected the cleanup
 - Issues of coordination among agencies, parties involved in the cleanup
 - Difficulties interpreting, complying with, or implementing BCRLF Program requirements
 - Major Deviations - describe any major deviations from the Design and Construction Plans
 - 4. Injury to Natural Resources - If applicable, indicate the content and date of any notice to natural resource trustees about injury or possible injury to natural resources. Indicate Federal and State trustee damage assessment activities and efforts to replace or restore damaged natural resources.
 - D. Site Manager Oversight - Describe the activities conducted by the Site Manager to ensure that the cleanup was performed in accordance with the Design and Construction Plans and the National Contingency Plan. Also record any items of note that the site manager observed while on site.
 - E. Resources Committed - Provide the cost breakdown and total dollar amount of the BCRLF funds utilized for the response.
- II. Conclusions - Provide a statement regarding the effectiveness of the cleanup (e.g., were cleanup levels achieved), any necessary post-cleanup site controls, and any

recommendations for further cleanup actions on the site.

III. References - Provide a reference list of related or supplemental documents (in lieu of attachments)

Appendix A Organization of the Removal Action - outline the organization of the removal action, indicating Federal, State, and Local agencies, other parties, and contractors that were involved with the cleanup, or provided assistance, and describe their actions or roles.

Appendix B Chronological Narrative of the Removal Action - Provide a detailed chronology of the events during the removal action.

1. Describe the actions taken to address the contamination during the removal action
2. Describe the technologies implemented to cleanup the site.
3. State the materials and quantities addressed, methods of disposal, and the location of the disposal facility.
4. Describe the public information and community relations activities performed.

Figures

Tables

SITE MANAGER REPORT
BROWNFIELDS CLEANUP REVOLVING LOAN FUND

Former Auto Finishing Site
123 Main Avenue
Anywhere, USA

November 30 to December 3, 1999

<Signature>

Joe Stevens
Site Manager, Brownfields Cleanup Revolving Loan Fund
City of Anywhere

<Signature>

Jim Brown
Lead Agency, Brownfields Cleanup Revolving Loan Fund
City of Anywhere

August 31, 2001

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Executive Summary

SITE: Former Auto Finishing Site

LOCATION: 123 Main Avenue
Anywhere, USA

PROJECT DATES: November 30 - December 3, 1999

DESCRIPTION: The site is a former auto finishing shop which occupies approximately 157,00 square feet. No permanent building structures are present and the site is secured with a chain link fence. The Smith Development Corporation (SDC) owns the property and plans to redevelop the site into a job training facility and community center.

Phase I and II environmental site assessments conducted in 1998 indicated soil impacts above the State Department of Environmental Protection Agency's Action Level for the solvent, trichloroethylene (TCE.) Therefore, the soil required cleanup before redevelopment could occur.

ACTIONS: Via its Brownfields Cleanup Revolving Loan Fund Program, the City of Anywhere loaned \$50,000 to the SDC to conduct the cleanup. SDC then contracted with Joe Construction to perform the excavation of approximately 600 cubic yards of solvent-contaminated soil. The contaminated soil was then transported for disposal to Acme Disposal Facility and the site was backfilled with clean fill. The site cleanup objectives were met as confirmed by post-cleanup soil testing.

I. Summary of Events

A. Site Conditions and Background

The site is a former auto finishing shop in Anywhere, USA. The site occupies approximately 157,00 square feet in a commercially-zoned area. The site is bordered on the north by X Avenue, on the west by Y Avenue, on the south by Z Lane, and on the east by the Anywhere Girl Scout Council office, as shown in Figure 1.

Historically, the site had four permanent structures (Figure 2) that were used to refurbish antique vehicles. The structures were demolished when the site closed in 1990. The site was secured with a chain link fence. The Smith Development Corporation (SDC) now owns the property and plans to redevelop the site into a job training facility and community center.

The following two assessments had been performed for the subject property: 1) "Phase I Environmental Site Assessment" by Environmental Consultants, June 1998; and 2) "Phase II Environmental Site Assessment" by Environmental Consultants, October 1998. Based on the assessments, the site's groundwater does not need to be addressed, but soil impacts were found above the State DEP Action level for the solvent, TCE. The cause of the release is unknown, but likely due to careless solvent handling.

B. Basis for Removal Action

The limited soil contamination was found in the area of former building #2. TCE levels in the soil samples collected from this area of the site ranged from 100-200 mg/kg. These levels exceed the State DEP health-based Action Level of 50 mg/kg. Based on the results of the assessment, approximately 300 cubic yards of the soil was contaminated. TCE was not detected in soil samples collected elsewhere on the site.

Based on the anticipated future use of the property, the threat to human health and/or the environment posed by the contaminated soil includes potential exposure to patrons of the proposed community center and to construction personnel and local residents during construction-related activities.

C. Summary of Removal Action

On November 30, 1999, Joe construction began excavation of the soil contaminated with TCE above 50 mg/kg. Approximately 600 cubic yards of soil were excavated and transported for disposal to the Acme Disposal Facility. The site was backfilled with drain rock to the top of the water table. A geotextile fabric was placed on top of the drain rock and Type II backfill material was placed over the rock and compacted to ground surface. Post-excavation soil sampling and analysis confirmed that all cleanup objectives were achieved. The cleanup was completed on December 3, 1999. A detailed chronology of the events that took place during the cleanup is presented in Appendix B.

The most significant problem encountered during the removal action involved the transportation and disposal of the contaminated soil. Joe Construction had received a verbal approval from the disposal facility based on incorrect data regarding the volume and contaminant concentration of the soil from the site. The trucks were subsequently rejected upon arrival due to a higher concentration of TCE than expected, which the facility stated would overload the treatment system. Final disposal was ultimately secured at the nearby Acme facility. However, the contractual problems that arose from this situation were time consuming and resulted in higher disposal costs than originally anticipated.

The Site Manager strongly suggests that in the future, all off-site disposal arrangements be made with correct information and that final acceptance at the disposal facility be received in writing prior to off-site transportation.

The removal action proceeded in accordance with the Design and Construction Plans except that the final volume of contaminated soil, 600 CY, was approximately twice the volume estimated in the Phase II Environmental Site Assessment.

No natural resources were impacted by this cleanup.

For information on the organizations that participated in this cleanup and their roles and responsibilities, refer to Appendix A.

D. Site Manager Oversight

The RLF Site Manager, Joe Stevens, performed field oversight of this removal action on November 30, 1999 and December 2, 1999. On November 30, 1999, Mr. Stevens was present on site for the excavation and stockpiling of the 600 CY of contaminated soil. On December 2, 1999, Mr. Stevens oversaw the backfilling of the excavation. Mr. Stevens noted that compaction procedures were followed and that appropriate compaction densities were easily reached. Upon review of the analytical results Mr. Stevens confirmed that all analytical data was of acceptable quality and showed cleanup levels were achieved throughout the excavated area.

E. Resources Committed

Through its Brownfields Cleanup Revolving Loan Fund Program, the City of Anywhere loaned SDC \$50,000 for the excavation and disposal of contaminated soil. The excavation costs were approximately \$35,000. Disposal costs were approximately \$15,000.

II. Conclusion

Post-cleanup testing confirmed that the excavation removed all soil contaminated with TCE exceeding the State DEP Action Level and that all cleanup objectives were met. The cleanup was performed in accordance with The Removal Action Plan for the Former Auto Finishing Site (Joe Construction, November 1999). All health and safety protocols and safety and environmental laws were followed during this cleanup. No post-cleanup site controls are necessary. No further cleanup actions are recommended at this site.

III. References

Former Auto Finishing Site Community Relations Plan, Anywhere USA, Jane Doe, City of Anywhere, July 1999.

Former Auto Finishing Site EE/CA Approval Memo, Anywhere USA, City of Anywhere, June 1999.

Former Auto Finishing Site EE/CA, Anywhere USA, City of Anywhere, August 1999.

Former Auto Finishing Site Action Memo, Anywhere USA, City of Anywhere, October 1999.

Former Auto Finishing Site Removal Action Plan, Anywhere USA, Joe Construction, November 1999.

Phase I Environmental Site Assessment, Environmental Consultants, June 1998.

Phase II Environmental Site Assessment, Environmental Consultants, October 1998.

Appendix A Organization of the Removal Action

Agencies or Parties Involved	Contact	Description of Participation
Smith Development Corporation (Borrower)	Sue Green	Site owner/developer. Hired Joe Construction to perform the cleanup. Coordinated with City of Anywhere's RLF Site Manager throughout the process.
City of Anywhere (Lead Agency and Lender)	Jim Brown	Lead Agency Brownfields Coordinator-coordinated with SDC and Site Manager and signed all formal documents.
	Joe Stevens	RLF Site Manager/On-scene Coordinator responsible for documentation of removal action per NCP. Performed field oversight, reviewed cleanup plans and data reports, and drafted and signed the Site Manager Report.
	Jane Doe	Public Affairs Officer - Coordinated with the Site Manager and communicated with the local government and surrounding community regarding project status throughout the cleanup process.
State Department of Environmental Protection	Mary Jones	DEP Brownfields contact who coordinated site activities through DEP. Reviewed findings of site assessments. Provided guidance on State regulations affecting the transport and disposal of contaminated soil.
US Environmental Protection Agency, Region Y	Sam Wilson	RLF manager - coordinated with City of Anywhere Brownfields Coordinator and provided guidance on NCP requirements.
Joe Construction	Sally Clark	Excavated & transported contaminated soil to Acme Disposal Facility
Environmental Consultants	John Evans	Performed Phase I, II Site Assessments

Appendix B Chronological Narrative of Removal Action

- Phase I and II site assessments were performed by Environmental Consultants in June 1998 and October 1998. Based on the assessments, the site's groundwater did not need to be addressed, but limited soil impacts were found above the State DEP action level for the solvent, TCE.
- In January 1999, the City of Anywhere approached the USEPA with SDC's plan to prepare the site for use as a job training facility and community center using a loan from the Brownfields Revolving Loan Fund Program to perform the cleanup.
- The following public information and community relations activities were performed before the response began: 1) Jim Brown of the Lead Agency designated Jane Doe as spokesperson, 2) Jane Doe conducted community interviews with 10 land owners within 100 yards of the site, 3) Jane Doe established an information repository at the Anywhere Library on 234 Main Avenue, 4) Jim Brown established the administrative record, 5) Jane Doe created a Community Relations Plan (CRP) specifically for the Former Auto Finishing Site, 6) EPA approved the CRP, 7) The public was allowed 30 days to comment on the Engineering Evaluation/Cost Analysis (EE/CA), and 8) Joe Stevens adequately responded to the public's concerns in writing.
- In the EE/CA, excavation and off-site disposal was chosen to remove the contaminated soil.
- Aboveground and underground utilities were surveyed. The planned excavation limits were not impacted by the locations of the utilities.
- Joe Construction began the cleanup on November 30, 1999, and screened the soil for volatiles using a Photo Ionization Detector (PID) while excavating the contaminated material. The excavation extended to approximately 35' wide by 40' long and 14' deep. Un-impacted soil was segregated from the impacted soil based on visual observations and field PID readings.
- Four discrete confirmation soil samples (S2-W-10', S3-S-10', S4-N-10', and S6-E-10') were collected at approximately 10' bgs along the perimeters of the remedial excavation. See Table 1. One discrete confirmation soil sample (S5-B-14') was collected at the center of the excavation at approximately 14' bgs. All five confirmation soil samples were sent to Environmental Laboratory for Volatile Organics analysis.
- All soil samples were below DEP regulatory limits except for soil sample S3-S-10. This sample exceeded the DEP's remedial action levels for TCE. See Tables 2-4.
- As a result of the confirmatory soil sample S3-S-10, the eastern two-thirds of the south wall of the excavation was removed an additional five feet and another discrete confirmatory soil sample (S7-S-10') was collected from the new southern wall. The soil sample S7-S-10 was sent to Environmental Laboratory for analysis.

- No analytes in sample S7-S-10' exceeded DEP's regulatory limits.
- The contractor backfilled the excavation to the top of the groundwater table (approximately 10' bgs) with drain rock. A geotextile fabric was placed on top of the drain rock and Type II backfill material was placed over the rock and compacted to ground surface. Certified technicians supervised the backfilling operation and performed in-place density testing to confirm compliance with compaction requirements.
- Approximately 600 CY of contaminated soil was transported to Acme Disposal Facility for proper disposal. All transportation manifests are maintained in the administrative record.
- The cleanup was completed on December 3, 1999.

FIGURES

TABLES