

Marjol Site Remediation Update

View this newsletter and other Marjol documents on the web at www.marjoldcleanup.com.

Number 88

February 27, 2008

What has happened over the last few months?...p. 1

What is happening in the next few months?...p. 1

Community Relations Activities...p. 1

The Basics-How Will Construction Activities Affect Me?...p. 2

The Details- Pre-Final (90%) Design...p.2

Permitting...p. 5

Contact List/Repository Location...p.6

For Questions or Comments, contact:

Lisa Ayers
570.383.9313 office
570.249.0918 cell
570.383.9309 fax
layers@advancedgeoservices.com

Marjol Web Site:
www.marjoldcleanup.com

WHAT HAS HAPPENED OVER THE LAST FEW MONTHS?

90% Design Submission: USEPA/PADEP's August 10, 2007 comments on the Preliminary (30%) Design Submission and Gould's responses were incorporated into the Pre-Final (90%) Remedial Design (represents about a 90% level of completion), which was submitted to USEPA/PADEP on November 8, 2007. The 90% Design took the information from the 30% Design to an almost final level of design completion, providing more details and changing or clarifying some of the information in the 30% Design. Gould's responses to USEPA/PADEP's October 4, 2007 comments on the sampling and analysis portions of the 30% Design were submitted to USEPA/PADEP on November 28, 2007 and were added into the Pre-Final (90%) Design Document. (Copies of the 90% Design are available at the Marjol Repository located at the Throop Municipal Building, 436 Sanderson Street in Throop, PA or at the Marjol Community Relations Office, 502 George Street in Throop, PA.)

Permit Submissions: Although it does not appear that any Federal permits are required for the implementation of the Final Remedy, there are State, County, and Local permits and approvals that are required. Gould has been submitting permit applications to the appropriate agencies. A summary of the various permit submissions is found on Page 4 of this newsletter.

Contractor Selection Process: The Contractor Selection Process began on November 15, 2007; letters requesting pre-qualification information were sent out to prospective contractors. The pre-qualification information submitted by the prospective contractors was reviewed and on December 5, 2007, letters were sent out to those contractors who made it through the pre-qualification step. A mandatory Site Walk was then held on December 19, 2007 with those contractors who were pre-qualified to bid on the Final Remedy. Bids are based on the 90% Design and were received on February 11, 2008.

WHAT IS HAPPENING IN THE NEXT FEW MONTHS?

It is expected that the Final Design (100%), which is what is used for construction, will be submitted to USEPA/PADEP after comments from all of the reviewing agencies have been received and incorporated (probably in March 2008). A contractor to perform the construction of the Final Remedy should be selected in early March 2008, and activities will move into the second phase, the Construction Phase.

COMMUNITY RELATIONS ACTIVITIES

As we move toward the beginning of construction activities, Gould will be increasing the number of newsletters, making updates to the web site more frequently, and making every effort to keep you informed of construction plans and activities. Gould will also be scheduling small group meetings with some of the neighbors who live closest to the Site to discuss aspects of the construction related specifically to them and to answer specific questions. Gould's Community Relations Representative, Lisa Ayers, is available to answer your questions at any time. Please feel free to contact her throughout this process.

We encourage everyone to log onto our web site at www.marjoldcleanup.com for the most recent information regarding the Marjol site.

- *Provide us with your e-mail address and we will notify you whenever the web site is updated.*

The Basics - How Will Construction Activities Affect Me?

Before we get into the details of what will be done, here is some basic information that may answer some of your important questions on how construction will affect you:

- 1) **When will construction start and when will it end?** The work is expected to begin the week of March 31, 2008, and take until November 2009 to complete.
- 2) **What about the traffic and the noise?** All reasonable effort is being made to keep the traffic on Borough roads to a minimum; however as with any construction site, there will be trucks, workers' vehicles and the noise of the equipment on-site.
- 3) **What will the working hours be?** Working hours will be from 7 AM to 7 PM Monday through Saturday consistent with the Borough ordinance.

The Details - Pre-Final (90%) Design

The 90% Design is similar to the 30% Design in many ways. As presented in the last newsletter, the implementation of the Final Remedy for the Marjol Battery Site generally includes the following activities:

- 1) Site Preparation;
- 2) Containment Area Construction;
- 3) Waste Excavation/Handling and Dust Control;
- 4) Containment Area Capping;
- 5) Restoration and Water Management;
- 6) Off-Site Verification Sampling; and
- 7) Post-Remediation Maintenance and Monitoring.

The last newsletter gave an overview of the 30% Design. This newsletter will provide an overview, but we will focus on those areas where the 90% Design is different from the 30% Design or where the 90% Design provides more information.

1) SITE PREPARATION

Establishment of the Support Zone (a "clean" area for office and equipment trailers, etc.), Decontamination Area, and Access Roads - The existing infrastructure will be used as much as possible, but alternate or additional items will be added as needed. It is anticipated that additional office and equipment trailers will be mobilized by the Contractor. These trailers will be staged at the existing support zone at the start of work. There will, however, be a point during construction when all trailers will be moved to a second support zone (at the north-east corner of the facility) to allow for excavations at the existing trailer location. The main entrance at Delaware Street will be used, except when excavation and restoration is occurring at the entrance.

During the time period when the Delaware Street entrance is being excavated and restored, the existing Woodlawn Street entrance will be used for personal vehicles. Delivery vehicles and trucks will not enter the Site during the time period when the Delaware Street entrance is closed. Deliveries will be sequenced to occur prior to the entrance being closed so that adequate materials are present for work activities to continue. Traffic on Borough roads will be minimized to the extent possible but there will be traffic going into and leaving the Site especially during mobilization, cap construction, and demobilization. The details of road protection will be determined based on Throop Borough requirements.

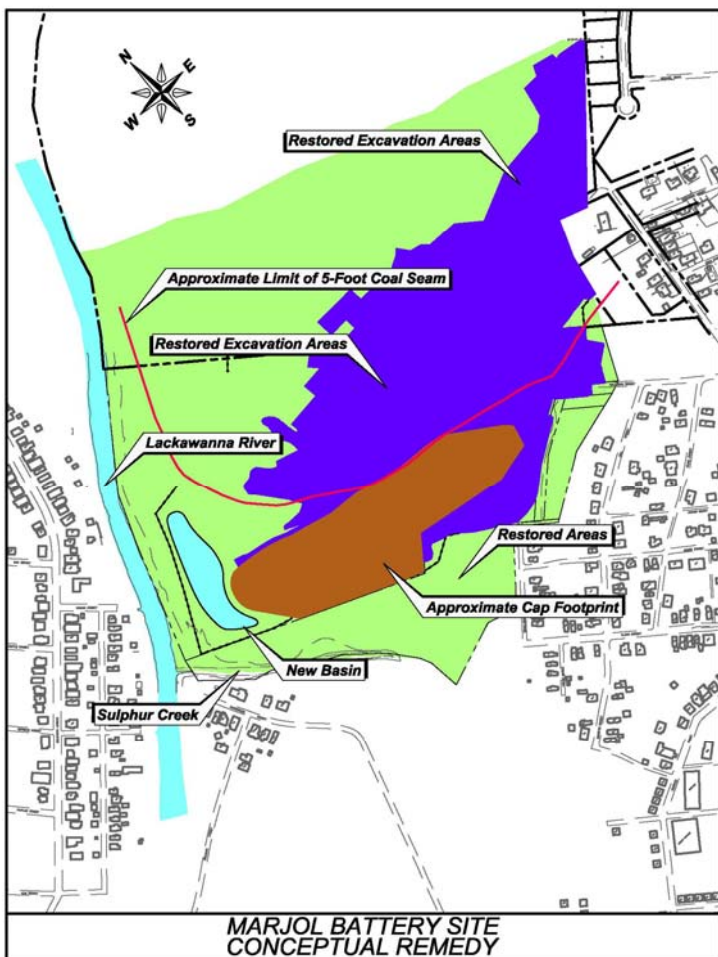
Security - Gould will provide 24-hour-per-day site security during active construction and demobilization. In addition, the Contractor will establish procedures to prevent unauthorized entry into the Site and to document all visitors.

Clearing and Grubbing - In areas of excavation less than or equal to 12 inches in depth, clearing of vegetation, brush and trees less than 12 inches in diameter will occur to prepare areas for excavations and consolidation. In areas of deeper excavation (in the North Woods and within the Containment Area and perimeter berm footprint), all vegetation, brush and trees will be cleared. Grubbing (removal of stumps and roots) will be performed in all cleared areas just prior to construction or excavation. The chipped materials are considered clean and will not be placed in the Containment Area. Grubbed materials from within the areas of contamination are considered contaminated and will be disposed of in the Containment Area.

Well Abandonment and Modification - Some of the monitoring wells that are in the proposed cap area or that will no longer be needed will be filled (abandoned) and some of the existing wells will be made higher so they can be used for long-term monitoring. One new well is being installed to replace an existing well that requires too much extension to be practical.

Utility Location and Abandonment - Any existing utilities that are present in excavation areas or the Containment Area (including electric, water, sanitary, storm, telephone and gas) will be either disconnected and abandoned or relocated prior to excavation or Containment Area construction. Electric, communications, water and sewer service to the existing trailer location will be maintained as long as possible, and terminated immediately prior to excavation in those areas. Electric and communications service will be provided at an alternate trailer location when this happens. Water service will be maintained to the Site as needed for dust control at all times.

Construction of a New Stormwater Management Basin - Construction of a new Stormwater Management Basin will occur because the old basin is located in the area where the new cap will be (the cap footprint). Once the new basin is constructed, stormwater flow will be diverted to the new basin and the old basin will be removed from service. The new basin will discharge into Sulphur Creek just as the current basin does. During construction, only water running over clean areas will be directed into the new stormwater basin. Water running over contaminated areas will be directed onto the cap area. A skimmer will be used to take water out of the basin and leave sediment behind in the basin. This protects Sulphur Creek and the Lackawanna River while construction is going on. The basin also will have a baffle in it that also helps keep sediment in the basin. Once construction is complete and grass is growing on all disturbed areas, the skimmer and the baffle will be removed. The following drawing shows the proposed location of the cap and the new stormwater management basin.



1:\MARJOL\DRAWINGS\92002\KPS2-002-tp-011.dwg, Conceptual Remedy

Demolition of On-Site Structures - The Drum Storage Area, trailer, and existing stormwater diversion structures will be demolished, and demolition debris will be placed in the Containment Area. The curbing/barriers at the Low-Haz and High-Haz Stockpile perimeters will be demolished concurrently with stockpile removal and placed in the Containment Area, or alternatively they may be decontaminated and reused as necessary.

2) CONTAINMENT (CAP) AREA CONSTRUCTION

It is anticipated that Containment Area preparation and construction, which involves grading and the building of a 10-foot-wide berm, will occur in two phases to minimize the size and duration of the disturbed area.

3) WASTE EXCAVATION/HANDLING AND DUST CONTROL

Waste excavation and placement includes the following steps:

Step 1) Excavation of contaminated soil and waste material from outside of the Containment Area footprint, including the North Woods;

Step 2) Consolidation of contaminated soil and waste material within the Containment Area; and

Step 3) Solidification of the uppermost layer of waste within the Containment Area with cement-based reagents before placement in the cap area. The 90% Design calls for 3 lifts of solidified material to be placed and compacted for a final thickness of 18 to 24 inches.

Dust Control

During construction activities, and in particular, during soil disturbance activities, the "No Visible Dust" rule will be strongly implemented. Soils that are set for excavation will be watered down before they are moved and every effort will be made to keep from creating dust. In order to be sure that construction activities are not impacting the air, air monitoring will be conducted during construction for all phases of soil disturbance to ensure that the surrounding community is protected. As discussed in the last newsletter, three types of air monitoring will be conducted: site perimeter, real-time and personnel.

Site perimeter monitoring will consist of ambient air monitoring for lead using the high-volume sampler method, which is what has been used over the past 20 years at the Site. This sampling will determine if air lead is being emitted from the Site. Results with this type of monitoring are not immediate as the air collection filters have to be sent to a lab for analysis.

During construction, two of the air monitors that are currently at the Site will be relocated to provide additional information for the community. One will be placed just inside the perimeter fence on Delaware Street where it will be visible to anyone driving near the Site; this will provide air lead data for residential areas adjacent to the Site. The other will be relocated to the Mid-Valley Secondary Center as requested by Throop Borough's Planning Agency and Engineer. This monitor will provide air lead data near the schools where many of your children attend.

Real-time dust monitoring will determine if dust is migrating outside of the immediate work area so that additional dust control measures can be implemented before any dust can move off-site. This monitoring will consist of hourly, real-time particulate (dust) monitoring with an aerosol monitor. Data will be gathered during working and non-working hours. This provides immediate information on the amount of dust (not just lead) being generated.

Personnel air monitoring will be performed to determine if site workers are wearing appropriate personal protective equipment. This monitoring uses a time-weighted average for measuring lead exposure. Results are not immediate as air filter canisters have to be sent to the lab for analysis.

4) CONTAINMENT AREA CAPPING

The proposed cap area is 9.7 acres in size. The proposed footprint of the cap has been designed such that the cap will be within the existing fence line. The proposed cap is expected to be able to accommodate all of the contaminated material that is going to be excavated and consolidated during the final remedy. At this point, it is not expected that any contaminated material will have to be removed from the Site.

Passive Gas Vent - Even though gas generation below the cap is expected to be minimal because the quantity of the type of material that creates gas is small compared to the overall volume of material in the Containment Area, passive gas vents will be installed at the highest point in the cap and on the sides towards the residential properties as required by USEPA and PADEP. The passive gas vents will allow gases generated by decomposition of biodegradable waste to exit the cap prior to building up at the underside of the cap.

5) RESTORATION AND WATER MANAGEMENT

- Following completion of excavation activities and confirmatory sampling, excavation areas will be backfilled and graded to the extent necessary to achieve drainage. Disturbed areas will be hydroseeded to restore vegetative cover.
- An access road will be constructed around the Containment Area to facilitate long-term operations and maintenance.
- Perimeter fencing removed during work activities will be reinstalled, or replaced with a new fence.
- Surface water run-off and infiltrated flow from the cap drainage layer will be managed by swales along the cap perimeter or will be allowed to flow away from the cap.
- The removal of trees during excavation activities will increase the amount of water flowing in the northeastern area of the Site, so a permanent stormwater diversion berm will be installed along the eastern property line to prevent flow from exiting the Site in that direction.

6) OFF-SITE VERIFICATION SAMPLING

Off-site verification sampling will be performed following remedial activities to confirm that remedial activities did not cause off-site contamination. Five locations are proposed for sampling in areas that were previously remediated; the locations will be finalized in the 100% Design. A total of 20 samples will be collected from each location during the pre-construction and also during the post-excavation sampling events. Ten samples from each location will be sent to a lab and analyzed and the remaining ten samples will be archived for future analysis if required.

7) PROPOSED POST-REMEDATION MAINTENANCE AND MONITORING

Post-Remediation Maintenance will include mowing and maintenance of the stormwater management basin.

- Mowing - the Site, including the cap area, will be mowed for turf establishment. Mowing will be conducted twice yearly during the growing season (May to October).
- Stormwater Management Basin Maintenance - maintenance will include measures to control burrowing animals, removal of accumulated sediment and maintenance of the discharge structure.

Post-Remediation Monitoring will include site inspections and sampling of groundwater and river sediment. More details on post-remediation monitoring were provided in the last newsletter and are available on the Marjol web site.

PLEASE UPDATE YOUR CONTACT INFORMATION

As we get closer to the start of construction, we would like to make sure that all of our contact information is as up to date as possible. Please take a minute or two and make sure we have the most up to date information for you. If your correct name is not listed on the mailing label for this newsletter, please call or e-mail me with your name, address, and telephone number so I can update it. Thank you!

Lisa Ayers (570)383-9313 or
layers@advancedgeoservices.com

PERMITTING

Gould started submitting applications for the necessary permits in August 2007 and will continue to make permit applications as necessary throughout the completion of the design work and at the beginning of construction. A summary of the various permits follows:

State and County Permits

1) A General National Pollutant Discharge Elimination System (NPDES) Permit Application for Stormwater Discharges Associated with Construction Activities was submitted to PADEP on December 21, 2007. PADEP then notified Gould that an Individual NPDES Permit would be required instead of a General NPDES permit. Gould submitted an Individual NPDES Application to PADEP on January 25, 2008.

2) It was determined that water from the new stormwater management basin will be discharged into Sulphur Creek (similarly to the existing basin), versus directly into the Lackawanna River. Therefore, a permit for discharge into regulated Pennsylvania waters is not needed.

3) PADEP granted Gould a waiver on a wetlands permit for the proposed filling of the existing basin on September 4, 2007.

4) On October 22, 2007, the PADEP Bureau of Air Quality determined that an operating permit was not needed for waste solidification using a pugmill during remedial activities.

5) On December 18, 2007, the PADEP Bureau of Air Quality determined that an operating permit was not needed for a Passive Gas Vent in the Cap.

Throop Borough Permits

1) A trailer occupancy permit will be requested for temporary office trailers that will be used to support remediation activities conducted by the Contractor, Gould, USEPA and PADEP. The zoning for the Site allows temporary use of office trailers for one year from the date approval is granted. As it is likely that the trailers will be needed for up to two years, Gould will request approval for two years as a special exemption use pursuant to the Throop Borough code.

2) A zoning permit was obtained on January 24, 2008, for installation of a new permanent fence at portions of the Site perimeter.

3) On December 4, 2007, Gould submitted a Stormwater Management Plan as part of the Preliminary Land Development Plan to the Borough Planning Commission along with information on proposed dust control and street protection/traffic control measures. The Stormwater Management Plan is required by the Borough's Stormwater Management Ordinances. On December 20, 2007, Gould received comments on the submission from Robert Nitch of Peters Design Group, on behalf of the Throop Borough Planning Agency. Gould responded to Mr. Nitch's comments on January 16, 2008.

4) Gould is in the process of discussing with Throop Borough whether a building permit is needed for the work and expects to resolve that question in the near future.

QUESTIONS?????

Do you have questions about the construction of the final remedy that you would like answered in the next newsletter? Call, fax or e-mail your questions to us and we will try to have an answer for you in the next newsletter.

Lisa Ayers Phone (570)383-9313

Fax (570)383-9309

E-mail layers@advancedgeoservices.com

Contacts

Advanced GeoServices (Engineering Consultant for Gould)
Lisa Ayers, Community Relations Representative
Site/Mailing Address: 400 Delaware Street
Office Location: 502 George Street
Throop, PA 18512
<http://www.marjolcleanup.com>

tel 570.383.9313 fax 570.383.9309
cell 570.249.0918
layers@advancedgeoservices.com

United States Environmental Protection Agency (USEPA)
Maureen Essentier (3WC22)
USEPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

tel 215.814.3416
Essentier.maureen@epa.gov
<http://www.epa.gov>

Pennsylvania Department of Environmental Protection (PADEP)
Len Zelinka
PADEP
2 Public Square
Wilkes-Barre, PA 18711-0770

tel 570.826.5441
lzelinka@state.pa.us
<http://www.dep.state.pa.us>

Repository Location

Marjol Battery Site Repository

The repository is located at the Throop Borough Municipal Building, 436 Sanderson Street, Throop, PA and is open Monday through Friday 9 am to 4 pm.

Do you want to be added to our lists?

If you would like to be added to the Marjol Battery site newsletter mailing list or the website changes list, please contact Lisa Ayers via e-mail, telephone, or fax or you can submit your address information on our web site at <http://www.marjolcleanup.com>.

Lisa M. Ayers
Marjol Battery Site
400 Delaware Street
Throop, PA 18512