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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: AUG 8 1988

SUBJECT: ACTION MEMORANDUM - Request for Removal Action at the Holtzman-Silverman Site, Ypsilanti, Michigan (Site Spill ID #AMY

FROM: Peter D. Neithercut, On-Scene Coordinator
Emergency Response Branch

TO:
Basil G. Constantelos, Director
Waste Management Division

Mary A. Gade, Acting Associate Division Director
Office of Superfund

PURPOSE

The purpose of this memorandum is to request approval to expend up to $55,750 to initiate an extent of contamination sampling at the Holtzman-Silverman site. This study will require an estimated five on-site working days to complete.

BACKGROUND

The Holtzman-Silverman site is a former gravel pit located south of Ypsilanti, Michigan, in Ypsilanti Township, Washtenaw County. The 62-acre site is generally flat with only one small building. There are two large ponds on the site. The native soil is classified as Fox Sandy Loam.

The owners of the property allowed the dumping of fill material in areas previously excavated, during the gravel pit operations, to keep the property above the shallow water table. This material included wastes from local industries.

Nearby residents use the site for recreation. Fishermen use the large ponds for fishing. A large portion of the site is used as a track for off road vehicles. Other areas appear to be used for picnics and parties.

On October 27, 1987, United States Environmental Protection Agency (U.S. EPA) Field Investigation Team (FIT) and a representative of the Michigan Department of Natural Resources (MDNR) visited the Holtzman-Silverman site. The team observed an estimated 13 drums of unknown materials and an area with soils highly saturated with an oil like substance.

On June 29, 1988, the U.S. EPA Technical Assistance Team (TAT) and U.S. EPA On-Scene Coordinator Peter D. Neithercut visited the Holtzman-Silverman site to perform a site assessment. Surface samples confirmed the presence of Polychlorinated Biphenyls (PCB) contamination above 50 parts per million (ppm). Depth sampling was not possible due to an asphalt like layer at a depth of 4 inches. Samples from thishard layer showed 116 ppm PCB's. It will be necessary to use heavy equipment to penetrate this layer and determine the vertical extent of contamination.

This site is not on the National Priorities List (NPL).

THREAT

This facility presents an immediate and substantial threat to human health and the environment. As outlined in the National Contingency Plan (NCP), 40CFR300.65(b)(2), the following criteria are met by the Holtzman-Silverman site:

1) Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals, or food chain;

Access to the site is not restricted. There are vehicle tracks throughout the site. A temporary fence erected by the MDNR to isolate a contaminated area has been driven over by off road vehicles. Local residents have been observed fishing in the two large ponds on the site.

2) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release; and,

Thirteen abandoned drums have been discovered on-site. An inspection of these drums showed they contain varying amounts of unknown material. It also showed that the drums were dented, bent, rusted, and several were open or had ruptured.

3) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.

Analytical results from samples taken in the contaminated area show PCB's in the range of 120 ppm. This contaminated loose fill was placed on top of the native sandy loam soils. There is a potential for this material to migrate, via groundwater or surface run-off, into the ponds on-site exposing the entire water shed. This potential is demonstrated by the level of 2 ppm PCB's found in a sample taken from the pond sediments.

ENFORCEMENT

See the confidential enforcement information in Attachment I.

PROPOSED PROJECT AND COST

The objective of this removal action is to conduct a study which will identify the lateral and vertical extent of contamination. The results of this study will be used to determine a method of site closure and generate a detailed cost estimate.

The following steps are proposed at the site:

1) Develop and implement site safety and security measures.

2) Implement an air monitoring program.

3) Develop an extent of contamination sampling plan.

4) Dig a series of trenches through the contaminated area.

5) Sample soils according to the sampling plan.

The estimated project costs are:

Cleanup Contractor	$33,000
15% Contingency	5,000
Subtotal	$38,000
TAT/TES	7,500
Extramural Subtotal	$45,500
Extramural Contingency (15%)	6,825
EXTRAMURAL TOTAL	$52,325
U.S.EPA Direct Costs (41 Regional hrs + 4 HQ hrs x $30/hr)	$1,350
U.S.EPA Indirect Costs (41 Regional hrs x $51/hr)	$2,075
INTRAMURAL TOTAL	$3,425
PROJECT TOTAL	$55,750

This action will require approximately 5 on-site working days to complete. It is anticipated that additional removal funds will be required to complete this action.

Due to the heavy recreational use of this area, this is a time critical action. This action is necessary to plan for further action and is consistent with any long-term remedial action that may be necessary.

RECOMMENDATION

Because the conditions at the Holtzman-Silverman site in Ypsilanti, Michigan, meet the NCP Section 300.65 criteria for a removal action, your approval of this request is recommended. The estimated total project costs are $55,750, of which up to $44,825 ($33,000 line item, plus $5,000 contingency, plus up to $6,825 of extramural contingency) could be used for extramural cleanup contractor costs. You may indicate your decision by signing below.

APPROVE: _____ DATE: 6/8/88
Director, Waste Management Division

DISAPPROVE: _____ DATE: _____
Director, Waste Management Division

Attachment

ATTACHMENT I

ENFORCEMENT CONFIDENTIAL

Redacted-information not relevant to the selection of the removal action.