

Project Profile
Sauer Dump Site

Description: Interim Remedial Action Required by an Administrative Order

Location: Dundalk, Maryland

EPA Estimated Value: \$150,000 - \$200,000

Contract Value: \$135,000

Actual Value: \$100,000

Client: American Premier Underwriters, Inc. and Smurfit-Stone Container Enterprises, Inc.

Major Activities

- Consulting Services and Negotiation
- Preparation of RAP
- Remedial Implementation
- EPA Interaction

Unicorn Management Consultants, LLC (“UMC”) was retained by American Premier Underwriters, Inc. (“APU”) and Smurfit-Stone Container Enterprises, Inc. (SSCE) to implement an Administrative Order for Removal Response Action (“Order”) which was issued by EPA under Section 106 (a) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9606 (a), on December 8, 2005 to SSCE, APU and Wittstadt Hunting Club, Inc. (“Wittstadt”) relating to the Sauer Dump Site (the “Site”) which is Parcel 425 located adjacent to/behind 4225 Lynhurst Road, Dundalk, Baltimore County, Maryland, 21222.

UMC prepared and submitted a Remedial Action Plan on December 27, 2005 in accordance with paragraph 8.3 of the Order. The RAP was approved by EPA on December 29, 2005. UMC was the site contractor during the implementation of the Order, which was completed in March 2006. The following items were performed:

Protect the public health

In an effort to prevent trespasser access to the Site, UMC installed a six-foot high chain-link fence generally around the perimeter of the Site as shown on Figure 2. The chain-link fence was constructed between January 31 and February 3, 2006. The fence consists of 11 gauge wire fabric with tension wires on the top and bottom to prevent trespassers from lifting or folding the wire fabric to gain access. A double-door swing gate (16 feet wide) was installed along the north-east section and another double-door swing gate (16 feet wide) was installed along the south section (adjacent to Back River). The location of fencing is within the Site boundaries (Parcel 425) and does not enclose the miscellaneous items (e.g., cars and storage vessels) that have been placed at the north end of the Site by adjacent property owners. Aluminum signs that state, “Danger Unauthorized Personnel Keep Out” have been placed every 30 feet along the fence fabric and on each swing gate.

Protect the Shoreline

In an effort to protect the shoreline from erosion, UMC installed Coir Logs along the banks of the Back River along the southern side of the Site. On February 2 and February 6, approximately 200 linear feet of Coir Logs were installed along the meandering river's edge against the standing phragmite vegetation as shown on Figure 2. Figure 3 provides a detailed illustration of its installation. All logs were secured with 5 and 6 foot stakes which were driven every 3 feet on each side of the coir logs. The stakes were then notched and cotton twine was used to further secure the logs. As discussed at the December 22, 2005 meeting, the existing phragmite vegetation has securely anchored the shoreline and disruption to that vegetation would only increase erosion potential.

Mitigate Further Erosion

In an effort to prevent erosion and migration of material from the 6000 square-foot Hot Spot Area as identified by EPA during the December 22, 2005 site visit and shown on Figure 2, on February 1 and 2, 2006, UMC regraded and covered the area with 6 milli-inch nylon reinforced UV protective polyethylene sheeting. First, the area was graded using a backhoe to allow for proper coverage by the sheeting. During the regrading activities, no containers (e.g., drum or transformer) were discovered. All debris encountered in the Hot Spot Area during regrading activities that would hinder the placement of the sheeting were decontaminated in place using a pressure washer. Decontamination water was allowed to percolate into the ground. After decontamination procedures were completed, UMC placed all decontaminated debris items recovered to the area immediately adjacent to the Hot Spot Area. Following grading activities, the backhoe was decontaminated with the pressure washer within the hot spot area.

After regrading the hot spot area, UMC placed 6 milli-inch thick nylon-reinforced polyethylene sheeting over the 6,000 square-foot area. To help keep the sheeting in place during heavy winds, approximately 130 sand bags were placed at a spacing of one bag every 10 feet along its width and every 20 feet along its length, with the bags placed along the seams and edges of the sheeting. Also, to discourage trespassers from removing the sheeting, UMC placed two (2) large concrete pipes on the sheeting.

Provide and Follow Site Specific Health and Safety Measures

The site-specific Health and Safety Plan (HASP) was followed for the RAP activities. The HASP, which is an appendix of the RAP, was prepared in accordance with 29 CFR § 1910.120 to protect the health and safety of workers, other personnel and the public from the hazardous material and work-related hazards.

Develop and follow an expeditious schedule to implement the RAP

UMC has followed the project schedule in the RAP. Attachment C includes the project schedule for this response action modified to reflect the actual initiation and completion dates of each task. Factors that could have affected the project schedule (i.e., extreme weather) were not encountered.