

U.S. ENVIRONMENTAL PROTECTION AGENCY  
\$250,000 EMERGENCY ACTION MEMORANDUM

Date: June 1, 2010

Subject: Action Memorandum for a Removal Action at the GoForth PCB Ballast site pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104

From: Karen Buerki, On-Scene Coordinator *KB*  
Emergency Response and Removal Branch

Thru: Matt Taylor, Chief  
Emergency Response Section

To: Site File  
Chris Masterson, REOC

I. Purpose

The purpose of this memorandum is to document the decision to initiate emergency response actions described herein for the GoForth PCB Ballast Site located at 113 GoForth Road, Landrum, Greenville County, South Carolina 29356, pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104. Environmental Protection Agency (EPA) Region 4 delegation of authority may be found in "Delegation 14-2. Response, authority to obligate CERCLA funding in the amount of \$250,000 to initiate Removal Actions where site conditions constitute an emergency has been delegated to the On-Scene Coordinator (OSC)."

II. Site Information

A. Site Description

Site Name: GoForth PCB Ballast  
Superfund Site ID (SSID): B496  
CERCLIS No: SCN000410557  
Lat/Long: 35° 10' 12.79"/-82° 13' 21.73"  
Removal Start Date: 5/29/10

NRC Case No:  
Site Location: Landrum, SC  
NPL Status: Non-NPL

## B. Background

### 1. Removal Site Evaluation

On Friday, May 28, 2010, South Carolina Department of Health and Environmental Conservation (SCDHEC) Duty Officer contacted Region 4 Duty Officer Alyssa Hughes for assistance with disposal and clean-up of approximately 50 GE Mercury Regulator Ballasts reportedly containing PCB oil. A citizen brought the material to a Spartanburg County Household Hazardous Waste Collection Day, but was turned away by the county, who contacted SCDHEC for assistance with disposal. OSC Karen Buerki was deployed to conduct the clean-up and dispose of the source material and assess potentially impacted areas. The ballasts had been loaded in the bed of a pick-up truck and were in poor condition, leaking their contents into the bed of the truck and onto the ground. OSC Buerki performed field screening of the oil using Chlor-n-Soil kits with positive results for PCBs greater than 50 ppm. The citizen reported that the ballasts had been dumped on the adjacent property in the early 1970s. Based upon OSC Buerki's observations and field screening results, OSC Buerki determined that conditions at the Site meet criteria listed under 40 CFR Part 300.415 for initiation of an emergency removal action.

### 2. Physical Location and Site Characteristics

The Site consists of two residential lots. One located at 113 GoForth Road, Landrum, Greenville County, South Carolina, and the adjacent lot where the ballasts originated.

### 3. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant

The materials known on site are Polychlorinated Biphenyls (PCBs) which are CERCLA hazardous substances. Due to the age and condition of ballasts, PCB-containing oil was being released to the ground.

## III. Threats to Public Health, Welfare, or the Environment

### A. Nature of Actual or Threatened Release of Hazardous Substances, Pollutants or Contaminants

PCB oil was being released from ballasts onto the ground. The property is not secured by a fence, thereby, allowing direct contact exposure. Drainage enters a roadside stormwater ditch and flows to a small creek approximately 300 feet from the dump site.

### B. Applicable factors which were considered in determining the appropriateness of a removal action:

  x   300.415(b)(2)(i) "Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants."

PCBs are hazardous substances. The property is not secured by a fence, thereby, allowing direct contact exposure. Precipitation may carry contaminated soil into the adjacent roadside ditch to a small creek approximately 300 feet away.

x   300.415(b)(2)(vii) "The availability of other appropriate federal or state response mechanisms to respond to the release."

At this time, there are no State mechanisms that are able to respond to this incident with the resources needed to assume the cleanup.

#### IV. Selected Removal Action and Estimated Costs

##### A. Situation and Removal Activities to Date

###### 1. Current Situation

The weather has been partly cloudy high temperatures in the 90s ° F. There has been no media activity.

###### 2. Removal Activities to Date

###### a. Federal Government/Private Party

Based upon the amount and location of the PCB oil, EPA and START and ERRS contractors have been activated to stabilize conditions at the Site. Emergency removal activities include, but are not limited to, the following:

- i. Preparation of a Health and Safety Plan.
- ii. Assessment of the levels of PCBs.
- iii. Segregation of ballasts for identification and disposal.
- iv. Recovery of leaking PCB oil.
- v. Excavation of PCB contaminated soil and sediment, as necessary, and restoration of the excavation locations.
- vi. Providing analytical for assessment and disposal profiling.
- vii. Providing off-site treatment and disposal, as necessary.
- viii. Performing demolition, as necessary, to remove PCB oil and providing for restoration of the associated damage, as necessary.

###### b. State/Local

State OSC Stephanie Garrett of SCDHEC requested EPA's assistance with the Site.

###### 3. Enforcement<sup>1</sup>

The PRP is the owner of the lot adjacent to 113 GoForth Road. The owner could not be located; therefore, they could not perform the proposed response promptly. There have been no enforcement actions initiated by EPA or the State.

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<sup>1</sup> Enforcement strategy is not part of the Action Memo for purposes of NCP consistency.

## B. Planned Removal Actions

### 1. Proposed Action Description

The specific tasks involved in the proposed response to the threats include:

- i. Preparation of a Health and Safety Plan.
- ii. Assessment of the levels of PCBs.
- iii. Segregation of ballasts for identification and disposal.
- iv. Recovery of leaking PCB oil.
- v. Excavation of PCB contaminated soil and sediment, as necessary, and restoration of the excavation locations.
- vi. Providing analytical for assessment and disposal profiling.
- vii. Providing off-site treatment and disposal, as necessary.
- viii. Performing demolition, as necessary, to remove PCB oil and providing for restoration of the associated damage, as necessary.

Any off-site disposal will be in compliance with the CERCLA off-site disposal policy. The rationale for choosing the response action, supporting data for the decision, and the technical feasibility and probable effectiveness of the proposed action may be found in the logbook kept by the START contractor during the Removal Action and in EPA Region 4 guidance on removal action levels for PCBs dated September 16, 2008.

### 2. Contribution to Remedial Performance

The proposed actions will, to the extent practicable, contribute to the efficient performance of any long-term remedial action at the Site.

### 3. ARARs

Removal actions conducted under CERCLA are required to attain ARARs to the extent practicable. In determining whether compliance with ARARs is practicable, the OSC may consider appropriate factors, including the urgency of the situation and the scope of the removal action to be conducted.

The Federal ARARs identified for the site include:

- |                                     |                                      |
|-------------------------------------|--------------------------------------|
| <input type="checkbox"/>            | RCRA Land Disposal Restrictions      |
| <input type="checkbox"/>            | RCRA Treatment, Storage and Disposal |
| <input type="checkbox"/>            | RCRA Transportation                  |
| <input type="checkbox"/>            | TSCA                                 |
| <input checked="" type="checkbox"/> | DOT                                  |
| <input type="checkbox"/>            | OSHA                                 |

The State has not provided any ARARs.

## 4. Project Schedule

The removal action is anticipated to be completed within two weeks on-site.

C. Estimated Costs<sup>3</sup>

## Extramural Costs:

	<u>Ceiling</u>	<u>Costs to Date</u>
ERRS – ER.....	\$75,000	\$ ,
START – TN&A/OTIE .....	\$30,000	\$ ,
Extramural Contingency (20%) .....	<u>\$15,000</u>	<u>\$ ,</u>
TOTAL, Extramural Costs.....	\$120,000	\$ ,
TOTAL REMOVAL PROJECT CEILING.....	\$120,000	\$ ,

## V. Expected Change in the Situation Should Action be Delayed or Not Taken

A delay in action or no action at this Site would increase the actual or potential threats to the public and the environment. The worst-case scenario is direct contact exposure to other residents.

## VI. Outstanding Policy Issues

None

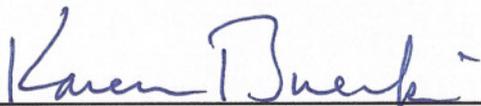
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<sup>3</sup> Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

## VII. Approval

This decision document represents the selected removal action for this Site, developed in accordance with CERCLA as amended, and not inconsistent with the National Contingency Plan. This decision is based on the administrative record for the site.

Conditions at the site meet the NCP section 300.415(b) criteria for a removal and through this document I am approving the proposed removal actions. The total project ceiling is \$120,000, of which, an estimated \$75,000 may be funded from the Regional removal advice of allowance.



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Karen Buerki, OSC  
U.S. EPA, Region 4