

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

**Date:** November 1, 2010

**Subject:** Action Memorandum for a Removal Action at the Dawson Forest Drum Site pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104

**From:** Alyssa Hughes, On-Scene Coordinator  
Emergency Response and Removal Branch

**Thru:** Matt Taylor, Chief  
Emergency Response Section

**To:** Site File  
Chris Masterson, REOC  
Lisa Boynton, Regional Coordinator, EPA-HQ

**I. Purpose**

The purpose of this memorandum is to document the decision to initiate emergency response actions described herein for the Dawson Forest Drum Site located ½ mile west of the intersection of Steve Tate Highway and Wildcat Campground Road, Marblehill, GA, 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:** Dawson Forest Drum Site  
**Superfund Site ID (SSID):** B4C7      **NRC Case No:** 958627  
**CERCLIS No:** GAN000410622      **Site Location:** Marblehill, GA  
**Lat/Long:** 34.4298683/-84.16411      **NPL Status:** Non-NPL  
**Removal Start Date:** 11/01/10

## B. Background

### 1. Removal Site Evaluation

On November 1st, Telephone Duty Officer received a report of approximately 40 drums that were illegally dumped on October 29th in an area of Dawson Forest. A hunter reportedly witnessed a box truck in the vicinity of the dumping and reported it to authorities. Georgia Department of Natural Resources reported the presence of 55-gallon drums to the National Response Center.

On November 2nd, EPA OSC Alyssa Hughes, START Contractor OTIE and ERRS Contractor ER met on-scene with Ga DNR personnel. Thirty-eight drums were located at the scene of the dump. Photographs and video were taken prior to any response actions. Background readings were taken with the Ludlum 19 and TVA 1000. The drums were then uprighted and numbered. An inventory of the drums was developed including: number, photograph, description of contents, percent full, and PID/FID reading just above the open top. This information will be compiled into a spreadsheet. A sample was pulled from each of the drums and field hazard categorization analysis (hazcatting) was performed. Based on the results of the field hazcatting, waste stream samples will be sent to the laboratory for analysis.

The hazcatting results indicated the following classifications:

Neutral - 16  
Acids - 3  
Bases - 6  
Flammables - 9

Three of the drums contained solid material and were unable to be sampled, and one drum contained trash.

Samples of each potential waste stream were collected based on the classifications. The samples were sent to the laboratory for analysis.

Based on the release of hazardous substances to the environment, OSC Hughes 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 is located in the Dawson Forest Wildlife Management Area in Marblehill, Dawson County, GA.

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

The site consists of 40 drums that were dumped in the woods. The drums vary in condition and quantity of material. Field hazard categorization testing indicates that there are flammable, acid and caustic materials present in the drums. The presence of this material constitutes a release into the environment of a hazardous substance.

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

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

The drums containing unknown substances were dumped in a public area of the forest where citizens have access to camping grounds and hunting facilities. The presence of these unknowns in an unsecure area presents a threat to public health and the environment.

**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."

The results of field testing indicate that the materials present contain characteristics of hazardous substances. The presence of these substances in a public area creates an actual exposure threat to nearby human populations.

\_x\_ 300.415(b)(2)(iii) "Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release."

Some of the drums had open tops and there was evidence of stained and damaged vegetation on the ground indicating that some of the material may have been released to the environment as a result of the dumping.

\_x\_ 300.415(b)(2)(v) "Weather conditions that may cause hazardous substances or pollutants or contaminants to

migrate or be released."

Rain events may cause released material to migrate to a larger area along the surface water pathway. There are two creeks present within ¼ mile of the dump site.

\_x\_ 300.415(b)(2)(vi) "Threat of fire or explosion."

Field hazard categorization testing indicates that some of the drums contain flammable material. The presence of this material in an unsecure environment creates a threat of fire or explosion.

\_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 Georgia Department of Natural Resources has blocked off access to the location of the drums with physical barriers. The weather is cool in the low 50s with a moderate breeze. There is no media involvement with the Site.

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

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

Based upon the conditions of the situation, EPA, ERRS and START mobilized to stabilize the site. Emergency removal activities include, but are not limited to, the following:

- i. Preparation of a Health and Safety Plan
- ii. Initial air monitoring to determine presence of threats.
- iii. Stabilization of drums.
- iv. Sampling and hazard categorization field testing of drums.
- v. Segregating drums according to compatibility.

- vi. Completing an inventory of drums including number, any identifying labels, drum condition and characteristics, and hazard categorization results.
- vii. Providing analytical for disposal profiling.
- viii. Providing off-site disposal, treatment, or recycling of drums.

b. State/Local

Georgia Department of Natural Resources personnel enlisted the support of EPA Region 4 to manage the clean-up of the abandoned drums.

3. Enforcement<sup>1</sup>

There is currently an investigation underway to determine the responsible party in this case.

**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. Mobilize manpower and equipment necessary.
- iii. Segregation of highly contaminated items for disposal.
- iv. Transfer materials from suspect containers into suitable containers.
- v. Move viable containers as determined by OSC.
- vi. Completing an inventory of drums.
- vii. Providing analytical for disposal profiling.

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

- viii. Providing off-site disposal, treatment, or recycling of materials.
- ix. Performing site restoration as necessary.

Any off-site disposal will be in compliance with the CERCLA off-site disposal policy.

## 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:

- RCRA Land Disposal Restrictions
- RCRA Treatment, Storage and Disposal
- RCRA Transportation
- DOT
- OSHA

The State has not provided any ARARs.

## 4. Project Schedule

The removal action is anticipated to be completed within two weeks of the Start Date listed in Section II of this document.

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

	<u>Ceiling</u>	<u>Costs to Date</u>
ERRS - Environmental Restoration.....	\$50,000	\$ ,
START - OTIE.....	\$10,000	\$ ,

<sup>3</sup> EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA.

Extramural Contingency (20%) .....	\$12,000	\$ ,
<b>TOTAL, Extramural Costs .....</b>	<b>\$72,000</b>	<b>\$ ,</b>
<b>TOTAL REMOVAL PROJECT CEILING .....</b>	<b>\$100,000</b>	<b>\$ ,</b>

**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.

**VI. Outstanding Policy Issues**

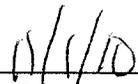
None

**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 \$100,000, of which, an estimated \$72,000 may be funded from the Regional removal advice of allowance.

  
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 Alyssa Hughes, OSC  
 U.S. EPA, Region 4

  
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 Date