

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

Date: March 25, 2011

Subject: Action Memorandum for a Removal Action at the Sharpsburg Junkyard 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 Sharpsburg Junkyard Site located in a rural residential area of Sharpsburg, Coweta County, 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 \$50,000 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: Sharpsburg Junkyard Site	NRC Case No: 970959
Superfund Site ID (SSID): B4G6	Site Location: Sharpsburg, GA
CERCLIS No: GAN000410671	NPL Status: Non-NPL
Lat/Long: 33.3408789/-84.6932562	Response Authority: CERCLA
Removal Start Date: 3/23/11	

B. Background

1. Removal Site Evaluation

At approximately 5:00 pm on March 23rd, Telephone Duty Officer received NRC Report #970959 filed by Georgia Environmental Protection Division Duty Officer indicating that several containers of unknown chemicals were discovered by local firefighters when they responded to the scene to extinguish a fire that appeared to emanate from a fire pit on-site. Firefighters were successfully able to extinguish the fire, but unable to contain approximately 10,000 gallons of runoff from the firefighting operations. Telephone duty officer dispatched responder Alyssa Hughes to address the unknown chemicals discovered at the Site.

On March 24th OSC Hughes met with the Coweta County Fire Chief and Captain to conduct a site walk-thru and identify any areas of concern. The fire chief indicated that he was uncertain as to the contents of the containers and concerned that there is a risk they might be involved in a fire. The area of the fire pit appears to have some buried material but it was determined to be outside the scope of this emergency response action.

EPA and START conducted hazard categorization field testing on the contents of the drums. Of the 36 drums originally identified, drums 1-4 were found to be empty and drums 15 and 24 contained solid material that was unable to be sampled, leaving 30 drums whose contents were sampled and tested. Hazard categorization testing indicated a potential of eight waste streams.

The potential waste streams identified are as follows. The number of drums identified in each waste stream follows the description.

- neutral liquids: 1
- oily water: 6
- organic solids: 2
- organic liquids: 6
- flammable solids: 1
- halogenated flammables: 3
- flammable liquids 1 (potentially toxic): 3
- flammable liquids 2 (insoluble): 8

The potentially toxic flammable liquids were identified solely based on color characteristics potentially indicating a higher metal content. Samples of each waste stream were composited and sent to the laboratory for analytical sampling. These results will be used to determine the waste profiles.

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 approximately 1 acre of private property adjacent to a lake. The property has two single wide trailers, one of which is currently occupied. There are several containers, work areas, material such as tires and wires and debris scattered throughout the property. The fire pit where the fire reportedly originated is located on the northwest end of the property. There was a shed located south of the fire pit, which was destroyed in the fire.

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

Firefighters arrived on-scene to extinguish the fire and discovered several 55-gallon drums in an unsecure uncontained area. Approximately 30 55-gallon drums were discovered in an unsecure area located approximately 20 yards from a lake. The drums contain unknown, potentially hazardous materials. Many of the drums are in unstable condition and require overpacking.

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

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

OSC Hughes and ERRS contractors identified 36 drums in unstable conditions. Twelve of the drums required overpacking in order to be suitable for transport. Laboratory analytical sampling indicated the following waste streams: Flammable liquids; Flammable liquids characteristically toxic for benzene; flammable liquids characteristically toxic for benzene and tetrachloroethene; and characteristically toxic for lead.

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

- 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."
- 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."
- 300.415(b)(2)(v) "Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released."

- x 300.415(b)(2)(vi) "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."

IV. Selected Removal Action and Estimated Costs

A. Situation and Removal Activities to Date

1. Current Situation

On March 23rd, 2011, GAEPD requested EPA assistance in addressing the release at the Site. EPA Telephone Duty Officer dispatched OSC Hughes to respond; EPA mobilized START contractor TTEMI and ERRS contractor ER on March 24th. On March 24th and 25th the drums were secured, staged and sampled for disposal.

2. Removal Activities to Date

a. Federal Government/Private Party

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 Environmental Protection Duty Officer enlisted the support of EPA Region 4 to manage the clean-up of the abandoned drums.

3. **Enforcement¹**

OSC Hughes met with the property owner and handed him a Notice of Federal Interest. OSC Hughes attempted to attain information regarding the contents of the drums and site operations. The PRP stated that he was uncertain as to the contents of most of the containers and that he has no means to dispose of the material. He granted access to the EPA to conduct stabilization, sampling and potential disposal of the material. The PRP was amenable to the EPA investigation and potential disposal of the material.

¹ 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. 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.
- 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 months of the Start Date listed in Section II of this document.

C. Estimated Costs³

	<u>Costs</u> <u>Ceiling to Date</u>
ERRS – Environmental Restoration	\$25,000 \$,
START – TT	\$10,000 \$,
Extramural Contingency	<u>\$15,000</u> \$,
TOTAL, Extramural Costs	\$50,000 \$,
TOTAL REMOVAL PROJECT CEILING	\$50,000 \$,

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.

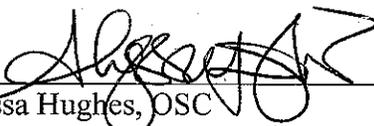
VI. Outstanding Policy Issues

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 \$50,000, of which, an estimated \$35,000 may be funded from the Regional removal advice of allowance.



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

3/25/11

 Date

³ 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.