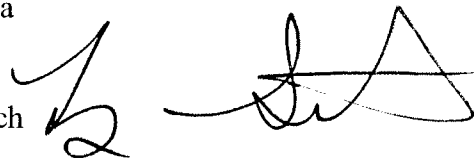


**U.S. ENVIRONMENTAL PROTECTION AGENCY  
\$250,000 EMERGENCY ACTION MEMORANDUM/INITIAL POLREP**

**DATE:** January 17, 2012

**SUBJECT:** **NOTIFICATION OF \$250,000 ACTIVATION**  
Lobeco Products  
Sheldon, Beaufort County, South Carolina

**FROM:** Terry Stilman, On-Scene Coordinator  
Emergency Response and Removal Branch



**THRU:** Jim Webster, Chief  
Emergency Response Section

**TO:** Site File  
Regional Response Center, 4SF-ERRB  
SC DHEC

**Site No:** B4N5

**ERNS No:** None

**NPL Status:** Non-NPL

**CERCLIS No:** N/A

**State Notification:** 1/17/2012

**Demobilization Date:** N/A

**Task Order No:**

**TO Amount:** \$50,000

**Contractor:** Environmental Restoration

**Response Authority:** CERCLA

**Start Date:** 1/17/2012

**Completion Date:** N/A

**I. Purpose**

The purpose of this memorandum is to document the decision to initiate emergency response actions described herein for the Lobeco Products (LP) Site in Sheldon, Beaufort County, South Carolina, pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104.

**II. Site Information**

**A. Site Description**

Site Name: Lobeco Products

Superfund Site ID (SSID): B4N5

NRC Case Number: N/A

CERCLIS Number: SCD046507018

Site Location: 23 John Meeks Way, Sheldon, SC

Lat/Long: N 32.555655°, W 80.729428°

Potentially Responsible Party (PRP): Coastal Demolition – Site Owner

NPL Status: Non-NPL

Removal Start Date: 01/17/2012

## **B. Site Background**

### *1. Removal Site Evaluation*

The LP site is located at 23 John Meeks Way in Lobeco, Beaufort County, South Carolina. The property includes 125 acres of land surrounded by agricultural, rural, residential, and undeveloped property. The closest cross road is Keans Neck Road, located ¼ mile to the northeast. A middle school lies approximately ¾ mile from the Site.

The LP site operated as a specialty chemical manufacturer for more than 40 years, from 1966 to 2009. The product lines included dyes, farm chemicals, drilling fluid chemicals, herbicides, pesticides, and general specialty chemicals. The property has been abandoned since December of 2010, with power off to most or all of the property.

The site was initially owned by Tenneco Chemicals, Inc. The Tenneco Chemicals Berkshire Color Division constructed the plant for the production of dyestuff intermediates in 1967. From 1974 to 1982 ACC owned the facility and operated as a manufactured chemical facility. From 1982 to 1989 the property was owned by Venture Chemicals (a.k.a. Lobeco Products). Venture Chemicals historically worked with basic cellulose and lignite derivatives. From 1989 to 1998 the site was owned by Compagnie Francaise des Produits Industriels (CFPI). CFPI was a manufacturer of agrochemicals, surfactants and other specialty industrial chemicals. NuFarm acquired CFPI stock in 1998 and owned the facility from 1998 to 2005. NuFarm also worked with chemicals and chemical preparation, particularly pesticides, herbicides and fungicides. From 2005 to 2009 the facility was owned by ARR-MAZ Custom Chemicals Inc, known for pesticides and agricultural chemicals. After ARR-MAZ the facility was shut down and sold at auction to Coastal Demolition. Coastal Demolition recovered an unknown amount of scrap from the facility, demolishing the reactor building in the process. No chemicals were reported to have left the facility during Coastal Demolition's operation.

While operating under Tenneco the facility used Monsanto Corporation's Aroclor 1248 PCB product as a heat transfer oil. The hot oil system in which Aroclor 1248 was used malfunctioned at times. Untreated liquids from the on-site lagoon were discharged directly into Whale Branch, which flows into Campbell Creek, and ultimately the Atlantic Ocean. Additionally, testimony during a lawsuit revealed that open burning of PCB-contaminated waste occurred on the property. In 1983 SC DHEC conducted an in-stream assessment of Campbell Creek and Whale Branch. A follow up SC DHEC study in December 1984 revealed the presence of PCBs in the immediate vicinity of the Lobeco plant effluent discharge point. As a result of this finding, Davis & Floyd Engineering conducted groundwater testing and produced a groundwater monitoring report which revealed the presence of PCBs at the Lobeco Plant.

Tenneco Products commissioned further tests in order to characterize the extent and location of the PCB problem at the Lobeco Plant. Initial soil borings indicated the presence of PCBs in the abandoned lagoon. In 1986 G & E Engineering, hired by SC DHEC, issued a preliminary investigation report pinpointing the location of the PCB contamination at the lagoon and burn site areas. In 1987, under the first of three SC DHEC consent orders, cleanup of the PCBs commenced and was concluded by November 1991. A subsequent well survey of residential wells was performed and found no PCB contamination of groundwater existed in the neighboring wells.

After Coastal Demolition took ownership, they began to remove all scrap and recoverable materials. In 2010, DHEC issued an order to cease activity based on improper NPDES discharges among other violations. Coastal Demolition made an attempt to correct the situation, but eventually abandoned the property. The site has been abandoned since 2010, with no power and no maintenance of the systems performed. Most of the plumbing and electrical systems have been scrapped, and there are signs of trespass and vandalism throughout the site.

Based on a DHEC request for assistance, EPA's Emergency Response and Removal Branch (ERRB) conducted an initial site walkthrough to determine potential sampling locations. During the November Site visit, approximately 9 - 250 gallon totes of suspected acid and several drums were found scattered throughout the Site. In addition, several above ground storage tanks labeled sulfuric acid and a debris pile containing suspected asbestos containing materials were observed. The debris pile is what remains of the demolished reactor building.

Plans for sampling of the containers, the debris pile and an on-site waste treatment plant were discussed with DHEC. A subsequent sampling plan was prepared by EPA's START contractor for review by ERRB and DHEC.

EPA's Site Investigation Section and DHEC also planned to conduct sampling of potentially contaminated soils, sediment and surface water, focusing on longer-term contamination issues.

On January 17, 2012, OSCs Stilman and Berry arrived at the Site with EPA's START contractor to conduct a sampling assessment of the facility. Upon arrival, OSCs Stilman and Berry observed the totes of suspected acid to be bulging and generally in poor condition. Based on the presence of containers of hazardous substances in poor condition and the lack of on-site facility personnel, OSC Stilman activated EPA's ERRS contractor (ER) to conduct stabilization actions.

## *2. Physical location and Site characteristics*

The site lies about 10 miles north of Beaufort, South Carolina, just north of Whale Branch, a tidal tributary of Campbell Creek. The site is located in a primarily rural area, although several residences adjoin the eastern edge of the property. The site is chiefly characterized by a large rubble pile (the former reactor building) and several dozen acres of waste water treatment ponds. Several warehouses and smaller buildings are located on the property, and the chemical treatment portion of the WWTP is still intact, with tanks full of treatment chemicals.

Currently the site retains a portion of the chemical processing structures, a storage/warehouse, a lab testing area, offices and the waste water treatment facility. Part of the processing facility has been demolished but the rubble remains onsite; there is concern for asbestos in the demolition debris

3. *Release or threatened release into the environment of a hazardous substance, pollutant or contaminant*

The materials released, and those under a threat of, to the environment are “hazardous substances” as defined by section 101(33) of CERCLA release (sulfuric acid and asbestos). Analytical results obtained prior to disposal will determine whether other material contained in drums and containers on-site are also “hazardous substances” as defined by section 101(14) of CERCLA.

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

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

Sulfuric acid is a CERCLA hazardous substance that can be harmful to humans through direct skin contact. According to the ATSDR ToxFAQs, “Sulfuric acid can cause burns to the skin, eyes, lungs, and digestive tract. Severe exposure can result in death.” Asbestos is a CERCLA hazardous substance that can be harmful to humans through inhalation of fibers.

**B. Check applicable factors (from 40 CFR 300.415) which were considered in determining the appropriateness of a removal action:**

- ☒ Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants [300.415(b)(2)(i)].
- ☐ Actual or potential contamination of drinking water supplies or sensitive ecosystems [300.415(b)(2)(ii)].
- ☒ Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that pose a threat of release [300.415(b)(2)(iii)].
- ☐ High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate [300.415(b)(2)(iv)].
- ☒ Weather conditions that may cause hazardous substances or pollutants to migrate or to be released [300.415(b)(2)(v)].
- ☐ Threat of fire or explosion [300.415(b)(2)(vi)].
- ☒ The availability of other appropriate federal or state response mechanisms to respond to the release [300.415(b)(2)(vii)].
- ☐ Other situations or factors that may pose threats to the public health or welfare of the United States or the environment [300.415(b)(2)(viii)].

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

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

*1. Current Situation*

During the site walk through, EPA OSCs Stilman and Berry on January 17, 1 totes of sulfuric acid and drums in an advanced state of deterioration were noted. Several totes

and drums had been opened by trespassers, and many of the sulfuric acid totes protective metal cages was completely rusted through. The polyethylene cubes within was merely resting against the broken ends of the metal. The plastic totes have been dried out by the sun, and without transfer to competent containers there is a substantial risk of rupture and leakage to the environment. Any individual attempting to move, access, or disturb the containers runs the risk of breaking the plastic and coming in contact with the acid within. Potential ACM may exist within the debris pile open to the environment.

2. *Removal activities to date*

a. Federal Government/Private Party

EPA mobilized START and ERRS contractors to conduct assessment and removal activities.

b. State/local

SCDHEC and local response agencies will be notified of the release. SCDHEC is presently conducting an assessment of soil and surface water contamination

3. *Enforcement*

EPA has contacted the property owner and has been granted access to conduct assessment and stabilization activities.

**B. Planned Removal Actions**

1. *Proposed action description*

- i. Transfer suspected hazardous materials into competent containers for on-site storage until disposal arrangements are made.
- ii. Bulk materials (acids, bases, flammable liquids and chloride liquids) from abandoned containers based on hazcatting results;
- iii. Contain and remove free liquids, sludges and asbestos containing materials in areas which pose a threat of release to the environment and/or pose a threat of exposure to human and environmental receptors;
- iv. Pump, overpack, stabilize, or otherwise secure containers found on-site to prevent further release of materials; and
- v. Arrange for off-site transportation and disposal.

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.

4. Project Schedule

The period of performance for the ERRS contractor has been set from 01/17/2012 to 09/17/2012.

**C. Estimated Costs\***

ERRS Costs	<b>\$210,000</b>
START Costs	<b>\$40,000</b>
<b>Total Removal Project Ceiling</b>	<b>\$250,000</b>

\*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. "

**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 health and/or the environment.

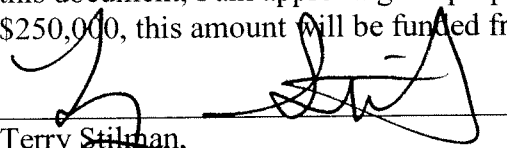
**VI. Outstanding Policy Issues**

None

**VII. Approvals**

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 action and through this document, I am approving the proposed removal actions. The total project ceiling is \$250,000, this amount will be funded from the Regional removal allowance.

  
Terry Stilman,  
Federal On-Scene Coordinator

1/17/12  
Date