

POLREP 63
NanoChemonics Site
4 Magnox Drive
Pulaski, Pulaski County, Virginia 24301

Lat: N 37.04718
Long: W 80.79146

ATTN: RRC
VADEM -Tolbert
VADEQ - Lohman
EPA - G. Heston

I. SITUATION (as of December 13, 2013)
EVENT: Site Cleanup Operations

- A. Refer to previous Polreps for site background information.
- B. STNP, the owner of the NanoChemonics property, is conducting a response action and cleanup of the Site under an EPA order. The Administrative Settlement and Order was signed on April 8, 2011, and response actions continue. In brief, the response action involves the removal of hazardous substances from the Site and included the removal of such substances found in the debris created during demolition of the buildings at the Site. The action also includes the management of wash waters and storm waters at the Site that migrate towards lagoons and then into nearby Peak Creek.
- C. The response actions related to the lagoons and drying bed began on September 25, 2013.

II. ACTIONS

- A. Activities relating to the lagoon systems at the Site are ongoing. STNP contractor ARG continued excavating sludge from Lagoon 3 using an excavator and hauling it to the drying bed with a dump truck. ARG also used a bulldozer to push sludge to the southern end of Lagoon 3 where it could be excavated and placed directly into the drying bed using the excavator. ARG also continued pumping and excavating sludge from Lagoon 4 to the drying bed using a mud pump and excavator.
- B. ARG collected storm water samples from the main sump and copperas area on the creek side of Site and MO pad during the week of November 26, 2013. The samples were sent to a laboratory subcontracted by MAA to be analyzed for PCB congeners. Results are pending.
- C. STNP contractor MAA submitted analytical results for lagoon sludge and drying bed samples on October 28, 2013 and December 2, 2013. MAA analytical results for TCLP metals in Lagoon (Lagoons 1, 2, 3, and 4) and drying bed sludge samples indicated that the sludge in lagoons and drying beds are below regulatory criteria and would not be classified as hazardous waste. MAA laboratory results indicated the

- presence of low levels of aroclors in one of two drying bed sludge samples and two of the four surface grab samples (0 – 3 inches depth) collected from Lagoon 3. In drying bed sample LGCDB-1, aroclor-1254 was detected at 0.083 mg/kg and aroclor-1268 was detected at 0.038 J mg/kg. The highest aroclor concentrations were detected in grab sample LGC-3A (collected from Lagoon 3, 0-3 inches depth), with aroclor-1254 detected at 0.99 mg/kg and aroclor-1268 detected at 0.34 mg/kg. Aroclors were not detected in any of the other lagoon and drying bed samples. EPA collected split samples of most of the MAA samples and sent them for analysis at EPA-assigned CLP laboratories. EPA analytical results also indicated that the lagoon and drying bed samples had TCLP metal concentrations below regulatory limits. EPA split sample results for other parameters were also similar to MAA results. EPA has not yet received the analytical results for a split sample collected from Lagoon 4.
- D. ARG continued cutting and removing piping and supports from along the eastern and southern side of Lagoon 1. The scrap metal is being transported off site for recycling.
 - E. EPA has established a public repository of site documents at the local library in Pulaski. EPA will also provide public information updates for the site on the EPA site website at: www.epaossc.org/nanochemonics.

III. FUTURE ACTIONS

- A. Continue response actions in the lagoon area including removal of sludge from lagoons into the drying bed.
- B. Complete response activities identified on July 27, 2012 inspection list. The remaining item to be completed on the checklist is cleaning ferrous sulfate (aka copperas) from the above-ground storage tank (AST) remaining on the CAB tank containment pad.
- C. Await analytical results for recent storm water samples from the Site to assist in evaluating completion of the response action involving the former facility buildings.
- D. Complete cleaning of storm water conveyance trenches and piping. The trench between Lagoons 1 and 2 remains to be cleaned out.
- E. EPA will continue providing on-site oversight of remediation activities conducted by STNP and inspect the Site against the required schedule.

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