



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MEMORANDUM

JUL 17 2013

SUBJECT: Delta Mills, Wallace, South Carolina, Site Referral to Emergency Response and Remedial Branch (ERRB) for Removal and Cleanup

FROM: Raj Aiyar *RA* 7/16/13
North Enforcement and Compliance Section
ROECB

THRU: Héctor M. Danois *HMD*
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Chief, RCRA and OPA Compliance and Enforcement Branch

TO: Matt Taylor
Section Chief
Removal Operation Section
Emergency Response and Removal Branch

The purpose of this memorandum is to refer the Delta Mills to the Emergency Response and Remedial Branch for proper removal and cleanup. The Delta Mills property includes two above ground storage tanks (300,000 and 500,000 gallons) that may have been used to hold PCB contaminated No. 6 fuel oil and a pump house where PCB spills may have occurred. On May 21, 2013, the ROECB met with the Superfund Program to discuss Delta Mills as a potential source of PCB waste oil at the P & W Superfund Site. The discussion also included the specific concerns about the PCB contaminated oil believed to be stored in one of the above ground storage tanks and also found in soils at the pump house at the Delta Mills property.

In 1947, J.P. Stevens Company began operating a textile dyeing and finishing plant at the Wallace location. In 1987, the facility's name was changed to Delta Mills and operations continued at the plant until December 31, 2006. In 2007, the facility was purchased by Schwarz Wallace, LLC out of bankruptcy.

In 2010, Schwarz Wallace, LLC, through its owner, Jeff Schwarz, sold the entire facility (approximately 620 acres) to Southern States Energy (SSE), owned by John Cunningham. Subsequently, in October, 2010, Mr. Cunningham and Mr. Schwarz revised the purchase agreement such that ownership of a .42-acre portion of the property reverted to Schwarz Wallace LLC. Located on this small .42-acre parcel are

two above-ground storage tanks (300,000 and 500,000 gallons) that had been used to hold No. 6 fuel oil and were thought to possibly contain PCB-contaminated oil, and a pump house where PCB spills may have occurred. Currently, SSE owns all of the facility with the exception of the two ASTs and the pump house. The portion of the facility owned by SSE also has a variety of environmental issues, including out-of-service PCB equipment in storage that must be shipped offsite for disposal. Mr. Cunningham has indicated that he is looking into the cost associated with disposing of this equipment.

On June 7, 2011, the EPA's Science and Ecosystem Division (SESD), along with the EPA Region 4's personnel, conducted a sampling and compliance evaluation inspection at the facility. The EPA assessed the ASTs, the AST containment area, the pump house and a reported burn area. Based on the assessment, the concerns are outlined below.

Concerns of Region 4 PCB Program:

- During the inspection, it was brought to the attention of the EPA Personnel that several break-ins have occurred at the property to steal copper from the electrical transformers on site. Also, during a conference call on May 2, 2013, Mr. John Cunningham mentioned that somebody had tried to break-in and vandalize the electrical equipment on site. The ROECB is concerned about the vandalism at the pump house containing PCBs as well as the ASTs.
- Potential exposure to PCBs by workers and trespassers at the pump house and in the vicinity of the coal pile where a known PCB spill has occurred in the past.
- TSCA provides no explicit authority allowing the EPA to order clean-up and removal of the PCB-contaminated soils and the PCB oils in the 500,000-gallon AST.

Based on the above mentioned concerns, including unreasonable risk to human health and the environment, the ROECB program would like to refer the Delta Mills, Wallace, South Carolina Site to the Emergency Response and Remedial Branch (ERRB) for removal and cleanup.