



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 02 2014

Mr. Jim Bateson
Division of Waste Management
NC Department of Environment and Natural Resources
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Subject: Pineville Textile Mill
Pineville, Mecklenburg County, NC

Dear Mr. Bateson:

The U.S. Environmental Protection Agency's Emergency Response and Removal Branch (ERRB) conducted a Removal Site Evaluation (RSE) at the above referenced site for potential removal action eligibility under the National Contingency Plan (NCP).

Based on the information collected during the RSE, the On-Scene Coordinator (OSC) recommends this **site be given priority** for removal eligibility contingent upon availability of approved funds under the EPA's Superfund Removal Program (see enclosed RSE memo). Concurrent with this recommendation, the EPA may also begin its enforcement activities to determine potentially responsible parties for this site.

A final determination of removal eligibility will be made by the OSC assigned to the site. A decision to conduct a removal action will be documented in an Action Memorandum and a copy will be forwarded to the State. Should the OSC make a final determination that a removal action is not warranted you will be subsequently notified of this determination.

Should you have any questions concerning ERRB's determination, please contact Brian Englert, OSC, at (404) 562-8854, or Matt Taylor, Chief of Removal Operations Section, at (404) 562-8759.

Sincerely,

James W. Webster, Chief
Emergency Response & Removal Branch

Enclosure

cc: Dawn Taylor
Brian Englert
Tony Moore
Matt Taylor
Kerri Sanders
James Webster
Richard Hammond
Anita Davis
Ronald Saskowski
Greg Harper

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Pineville Textile Mill Site
Removal Site Evaluation POLREP



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #1
Removal Site Evaluation
Pineville Textile Mill
436 Cone Ave, Pineville, Mecklenburg County, North Carolina 28134

Latitude: 35.0837829° N
Longitude: 80.894951° W

To: Matt Taylor, USEPA R4 ERRB
From: Brian Englert, On-Scene Coordinator
Date: September 29, 2014
Reporting Period: 08/28/2014 to 09/29/2014

1. Introduction

Site Number: B44J
Response Authority: CERCLA
Response Type: Time-Critical
Response Lead: EPA
Incident Category: Removal Assessment
NPL Status: Non NPL

1.1 Site Description

The Site is a former textile mill in Pineville, North Carolina (NC). The mill is no longer operating and has fallen into disrepair. The property is being used to stage a number of abandoned drums containing PCB oil and corrosive material. Some of the drums are leaking. Asbestos abatement debris is being improperly stored and staged around the facility which is in close proximity to residential areas. An underground sump of unknown volume, two 25,000-gallon heating oil tanks and a surface retention pond on-site are located on the Site.

1.2 Preliminary Removal Assessment/Removal Site Inspection Results

North Carolina Department of Environment and Natural Resources (NC DENR) contacted the EPA on August 28, 2014, regarding a former textile mill in Pineville, NC. NC DENR requested

support responding to the mill property based on approximately 41 abandoned drums with suspected PCB oil and corrosive labels. At least one drum sampled by Mecklenburg County in May of 2014 was determined to contain PCB Aroclors 1254 and 1260 at 11 and 14 parts per million (ppm) respectively. On August 28, 2014, the EPA On-Scene Coordinators (OSC) mobilized to the Site to assess the situation, provide the necessary response and support the State. It was determined that a Removal Site Evaluation (RSE) should be conducted. The EPA began negotiating access with the Site owner.

1.3 Site Location

The Pineville Textile Mill Site (the Site) is located at 436 Cone Ave, Pineville, Mecklenburg County, North Carolina 28134. The latitude and longitude of the Site are 35.0837829° North and 80.894951° West. The Site is bordered by Norfolk Southern railway and a community park to the northwest, an office building and vacant lot to the northeast, residential properties to the east and south and additional residential properties and office buildings to the southwest. Sugar Creek, a tributary of the Catawba River runs east to west approximately 1,000 feet north of the Site.

2.0 Removal Site Evaluation

From September 23 – 25, 2014, the EPA and Superfund Technical Assessment and Response Team (START) performed a RSE and collected samples. During the RSE, the Site custodian, Site owner and Town of Pineville Code Enforcement Section contacted the EPA OSC to discuss Site conditions.

The EPA OSC observed between 40 to 50 drums and miscellaneous containers being staged at various locations around the facility. Several of the drums were leaking and were over packed on-site. Approximately 20 of the drums contained transformer oil which previous sampling had confirmed the presence of PCBs. Several miscellaneous containers had labels indicating they may contain corrosive materials. Samples were collected for HazCat characterization and laboratory analysis.

The custodian confirmed that several areas of the facility were undergoing asbestos abatement activity and that there was asbestos containing material (ACM) material throughout the factory area of the Site. Suspected ACM including primarily piping insulation possibly containing amosite. Numerous stockpiles of improperly stored abatement wastes were observed. Some of these materials were located in a large roll off dumpster in the facility parking lot and staged at various locations inside the warehouse and factory areas in the mill. There is also possible release of asbestos into the environment as a result of a partial demolition of the building.

In addition there is an underground concrete storage tank, formerly used to hold cooling water which has accumulated a large amount of storm water. The volume of the tank is unknown. There are also two 25,000-gallon heating oil tanks on-site which contain oily sludge and tank bottoms. The EPA collected samples from both tanks. While on-site the EPA observed evidence of trespassing and vagrancy in the warehouse and factory areas of the Site.

3.0 Anticipated Activities

PCBs and asbestos are hazardous substances as defined by CERCLA 101 (14) and listed in Title 40 of the Code of Federal Regulations (CFR), Section 302.4 and hazardous chemical substances as defined in Toxic Substances Control Act (TSCA). The EPA has reviewed available data and conditions at the Site and determined that the conditions at the Site meet the criteria for a removal action found in Section 300.415 (b)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

Section 300.415 (b)(2)(i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants. There is evidence of trespassing and vagrancy in the warehouse and factory areas of the Site. There are a number of drums, containers and ACM being stored at the Site. Some of these are exposed to the elements and in poor condition. Several had to be over packed during the RSE. A number of drums were observed leaking, and ACM is being improperly stored in close proximity to residential areas. Further release and potential exposure is likely unless drums and ACM are addressed.

Section 300.415(b)(2)(iii) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that pose a threat of release. There are between 40 and 50 drums and containers being improperly stored at the Site. Several of these were observed leaking and if continually stored in deteriorating conditions, as observed during the RSE, will leak in the future.

Section 300.415(b)(2)(v) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released. A number of the drums containing transformer oil are being stored outside of the warehouse area and are exposed to the elements. There are a number of areas in the factory which have undergone demolition. This has resulted in a great deal of storm water infiltration which is accumulating the basement of the facility where additional containers are being stored. Over time it is inevitable that this will result in additional releases to the environment.

Section 300.415(b)(2)(vi) Threat of fire or explosion. Due to the storage of flammable, combustible or incompatible materials in poorly maintained containers, threat of fire or explosion is a concern. Many of the materials are being stored in containers that are in poor condition. Likely future leaks could result in fire or explosion.

Section 300.415 (b)(2)(vii) The availability of other appropriate federal or state response mechanisms to respond to the release. There are no other federal or state agencies available to respond. The State of North Carolina lacks the resources necessary to conduct removal action.

Based on the presence of PCB containing transformer oil stored on-site and ACM, the EPA Region 4 Emergency Response and Removal Branch recommends that the Site be considered for a removal action.

concur - Matt Taylor 9/30/14