

Special Bulletin A - Polrep #1
Lin Electric Company Site
1400 Bluefield Avenue
Bluefield, Mercer County, West Virginia 24701
Latitude 37 degrees 15 min 783 sec Degrees North
Longitude 81 degrees 14 min 419 sec Degrees West

DATE: December 2, 2004

FROM: Nicolas Brescia, On-Scene Coordinator (OSC)
Removal Response Section (3HS31)

TO: EPA Regional Response Center

SUBJECT: Notification of \$250,000 Emergency CERCLA Removal Action

ATTN: Abraham Ferdas
Kathy Hodgkiss
Dennis Carney
Charles Kleeman

I. Issue

The On-Scene Coordinator (OSC) conducted a removal assessment in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (104)(b)(1) and 40 CFR Part 300 of the National Contingency Plan (NCP) of an abandoned facility located at 1400 Bluefield Avenue, Bluefield, West Virginia ("Site"). The removal assessment revealed the presence of uncontrolled hazardous substances, pollutants or contaminants at the Site posing a threat to public health or welfare or the environment. The OSC has determined that the Site meets the criteria for removal actions in 40 CFR Section 300.415 of the NCP. As a result of current site conditions, a removal response action pursuant to CERCLA (104)(a)(1), as amended, is necessary at the Site. Pursuant to Delegation of Authority 14-2, the OSC is authorizing CERCLA funding in the amount of \$250,000 to initiate a removal action to secure the Site and properly address the hazardous substances, pollutants or contaminants that are present.

II. Background

The Site is located at 1400 Bluefield Avenue, Bluefield, Mercer County, West Virginia. The site is located on parcels 9-13 and 314 of Map 24 of Tax District 3 in Mercer County. The Site consists of a large warehouse with multiple storage areas and entryways ("structure") and some land covering an area of approximately 4 acres. According to the West Virginia Department of Environmental Protection (WVDEP), the property was closed shortly after the owner of the company, Mr. Lindon Taylor became deceased in February 2003. The current owner of the abandoned facility is Mr. Taylor's spouse, Mrs. Carol Taylor. First Century Bank of

Bluefield currently holds the mortgage on the property. According to the WVDEP, the facility was used for electric part/metal cleaning and forming operations.

The WVDEP conducted a site closure inspection at the facility on April 22, 2004. The following chemicals were observed during the state inspection; toluene, xylene, acetone and varnishes. In addition, the state observed containers of corrosive and flammable substances, and containers with ash. During questioning, Mrs. Taylor informed the WVDEP that chlorinated solvents were not used at the facility, only xylene and other non-chlorinated solvents. The WVDEP provided the inspection report, inclusive of photographs to EPA on or about August 18, 2004.

On or about August 18, 2004, Christopher Gatens from WVDEP contacted OSC Brescia, and requested technical assistance from the Removal Program to conduct a removal assessment at the abandoned Site for consideration for a potential Superfund removal action. The state representative provided pertinent email regarding the Site that included a facility inspection report and numerous photographs. On August 18, 2004, the OSC began coordination with the WVDEP.

After contacting Carol Taylor, the current owner of Lin Electric and receiving access from her, OSC Brescia scheduled a removal assessment for November 30-December 1, 2004. Mrs. Taylor informed OSC Brescia that she had no funds available to provide any type of cleanup at the facility. Mrs. Taylor requested that the USEPA handle the assessment and cleanup operations if they were necessary. The removal assessment was conducted on November 30-December 2, 2004. Present at the Site were Mrs. Taylor, WVDEP representative Mrs. Penny Harris, OSC Brescia and the Superfund Technical Assistance Response Team (START). Mrs. Harris escorted the EPA team into the facility where the hazardous substances, pollutants, or contaminants were located.

The OSC and START compiled an inventory of the known labeled substances present at the Site.

Hazardous substances designated under CERCLA (102)(a) and codified in 40 CFR Section 302.4 (a) were found at the Site based upon the onsite inventory that was performed. These include, but are not limited to, acetone, styrene, xylene, and toluene. These listed hazardous substances were found in 55-gallon drums. The conditions of these containers were consistently poor and many of the drums were not secure. The assessment revealed that spills have occurred from caustic compounds and from used motor oil in multiple areas of the facility. A significant portion of the floor in one storage area was thickly coated with an unknown substance. The OSC directed START as part of the inventory process to inventory substances that appeared on labels with trade names. After completing the inventory of known and unknown substances, the OSC directed START to perform random hazard categorization of mostly unknown and some known substances. The results of the hazard categorization revealed the presence of corrosive and flammable hazardous substances in accordance with 40 CFR Section 302.4 (b). The storage of hazardous substances, pollutants or contaminants can be

considered hap-hazard. Significant deterioration was observed in over 75% of the drums inventoried. Many drums were bulging, and could possibly collapse if moved.

III. Threats to Public Health or Welfare or the Environment

Section 40 CFR Section 300.415 of the NCP lists the factors to be considered in determining the appropriateness of a removal action. At this time, paragraphs (i), (iii), (vi), (vii) of Section 300.415 of the NCP apply as follows to the conditions at the Site.

300.415 (b) (2) (i) “Actual or potential exposure to nearby populations, animals or the food chain from hazardous substances, pollutants or contaminants.”

The Site is located in a commercial/residential setting. The Site is at least partially fenced, but the main gate preventing unauthorized access is damaged and open, therefore, access to the Site is unrestricted. The property appears to be abandoned by the owner and the onsite facility holding hazardous substances, pollutants or contaminants contains multiple broken windows and a badly damaged roof. Access to the front portion of the structure where hazardous substances, pollutants or contaminants are located is impeded only by a rope holding a door covering the entry way. Residential homes are located approximately 100 yards from the Site. Moreover, active local businesses are located across the street and directly adjacent to the Site. The Site is located on a “primary”, high traffic street in Bluefield. Multiple drain systems within the facility could provide a route of any spilled materials to enter the storm drain system connected to a nearby stream. Numerous drums, containers and bags of chemicals were observed during the removal assessment that may be accessed by trespassers onto the property should they gain access to the structure. Access by trespassers is currently occurring and previous acts of vandalism were observed at the facility.

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.”

The removal assessment revealed numerous drums, containers, and bags of chemicals stored hap-hazardly throughout the interior and exterior of the onsite structure. Hazardous substances in accordance with CERCLA (102)(a) and codified 40 CFR Section 302.4 (a) were observed during the onsite inventory process. Moreover, hazard categorization of unknown containers performed onsite revealed the presence of characteristically hazardous substances in accordance with 40 CFR Section 302.4 (b). During the hazard categorization, corrosives and flammables were found. Multiple 55-gallon drums marked corrosive, toxic, and flammable were observed on the Site. The majority of these containers were found in poor condition, and some were found bulging.

300.415 (b) (2) (vi) “Threat of fire or explosion.”

The removal assessment revealed known labeled and unknown substances that are flammable. Parts of the interior of the facility contain wood flooring that may facilitate a chemical fire should an ignition source, such as a cigarette, be provided. In addition, hazardous substances, pollutants or contaminants are hap-hazardly stored and the potential for incompatible storage to be present is likely. A chemical fire would threaten the nearby residents and local business establishments.

300.415 (b) (2) (vii) “The availability of other appropriate Federal or state response mechanisms to respond to the release.”

On or about August 18, 2004, a state representative from the WVDEP contacted EPA and requested technical assistance from the Removal Program to conduct a removal assessment at the abandoned Lin Electric Company Site for consideration for a potential removal action. Therefore, Federal removal action is appropriate to address the threat posed by the conditions at the Site at this time due to the state’s request.

IV. Actions

The OSC has identified a need to conduct immediate stabilization and decontamination activities at the Site. This will include the following activities:

B. Stabilization and Staging of Chemicals

Immediately stabilize hazardous substances, pollutants or contaminants/oil and Site conditions in order to prevent release/discharge or the threat of release or discharge and public exposure. This will be performed both within the structure and outside the structure where hazardous substances, pollutants or contaminants are found.

2. Drum, Vessel and Small Container Recovery - Recover, stabilize, identify, overpack, segregate and stage drums and bags, vessels and small containers, and their contents, spilled material and associated contaminated soils. This will be performed both within the structure and outside the structure where hazardous substances, pollutants or contaminants are found.
3. Compressed Gas Cylinder Recovery - Recover, identify, segregate, stabilize and stage compressed gas cylinders and their contents. This will be performed both within the structure and outside the structure where hazardous substances, pollutants or contaminants are found.
4. AST Tank Removal - Identify, empty, remove and stage above-ground storage tanks (ASTs), contents, spilled materials, and associated contamination. This will be performed both within the structure and outside the structure where hazardous substances, pollutants or contaminants are found.

5. Incidental Hazardous Substances Recovery - Recover, identify, segregate, overpack, stabilize and stage small containers and small quantities of hazardous substances/oils unexpectedly encountered. This will be performed both within the structure and outside the structure where hazardous substances, pollutants or contaminants are found.
6. Interior Surface Decontamination - Decontaminate interior surfaces of buildings, other structures, and other vessels identified by OSC as contaminated.
6. ARARs - In conducting the recovery and decontamination, comply with all applicable or relevant and appropriate environmental regulations to the extent practicable depending on the exigencies of the situation as directed by OSC.

B. Proper Off-site Disposal, Recycling and/or Reuse of Chemicals Addressed under (A) Above

All hazardous substances, pollutants or contaminants addressed under (A) above and associated containers and materials shall be disposed, recycled or reused off-site as follows:

2. Recycling, Salvage and Reuse for CERCLA Sites - Recycle and/or reuse hazardous substances, pollutants or contaminants at off-site facilities as appropriate and in accordance with CERCLA 121(d)(3) and 40 CFR Section 300.440.
3. Off-site Disposal - Provide off-site transportation and disposal of hazardous substances pollutants or contaminants in accordance with CERCLA 121 (d)(3) and 40 CFR Section 300.440.
4. Handling of Associated Materials - Recycle, salvage or dispose off-site associated containers and materials, including drums, cylinders, and etc.

C. Site Preparation and Support

The following activities will be performed to prepare the Site for response activities. The work will be conducted as needed to prepare the Site for the performance of the above response work and support such work as follows:

2. Field Support Facilities - Provide a field office, including support facilities.
3. Site Security - Provide 24-hour Site security, which will include signs, barriers, fencing and securing structures. The purpose is to keep trespassers off the property

4. Improve Site Accessibility - Improve/provide accessibility onto and within the Site for response personnel, vehicles, equipment, utility service and Site monitoring by developing Site access routes, staging areas and parking.
5. Clear Site Debris - Clear, remove & dispose Site debris, vegetation and obstructions and continue to control grass and weed growth in order to safely and efficiently perform tasks.

D. Continued inspections, sampling and response actions shall extend to all things on and within the Site and within the Scope of CERCLA

The following activities will be performed continue assessment activities at the Site for characterization of hazardous substances, pollutants or contaminants and to facilitate the disposal, reuse, or recycling of hazardous substances, pollutants or contaminants.

5. Inspection - Inspection of all areas of the structure as well as the outside areas in order to identify and characterize the release or threatened release of hazardous substances, pollutants or contaminants (as defined in Section 101(33) of CERCLA, 42 U.S.C. § 9601(33)) into the environment at and/or from the Site; and the risks to public health or welfare and the environment.
6. Sampling and Analysis - Collect for analyses (to be conducted onsite and offsite) samples of substances present in drums, bags, containers, tanks and other vessels, as well as substances present on any surfaces including but not limited to the floors, walls, drains, vats, and ceilings inside of all areas of both buildings, cabinets, desks or closets (locked or unlocked) in all areas of both buildings. Sample and analyze soil, water and/or air inside and outside of the structure.
7. Records Review and Documentation - Review records found in all areas of the structure (whether located in locked or unlocked containers, cabinets, desks, closets) in order to determine: i) the nature of the business conducted at the Premises; ii) the inventory of substances on the Premises. These records may be reviewed offsite for safety reasons. Photograph and/or videotape the interior and exterior of the structure and the grounds outside.

V. **Estimated Costs**

ERRS.....	\$ 175,000
START.....	\$ 75,000
Total.....	\$ 250,000