

U.S. ENVIRONMENTAL PROTECTION AGENCY
\$200,000 EMERGENCY ACTION MEMO

Date: 8JUN09

Subject: Robinson Foundry
505 Robinson Court
Alexander City, AL

From: Alyssa E. Hughes, OSC, Region IV

To: Regional Response Center, 4SF-ERRB

I. PURPOSE

The purpose of this memorandum is to document the decision to initiate emergency removal/ stabilization actions described herein for the Robinson Foundry Site located at 505 Robinson Court, Alexander City, Tallapoosa County, Alabama, under the OSC's \$200,000 authority. The initial POLREP for this site has already been written and posted on www.EPAOSC.net.

II. BACKGROUND

Site No: A4ZQ	Delivery Order No: 0036
	DO Amount: \$ 40,000.00
	Contractor: WRS Compass, Inc.
CERCLIS No: _____	ERNS No: _____
Response Authority: CERCLA	NPL Status: No
State Notification: 8JUN09	Start Date: 8JUN09
Demobilization Date: _____	Completion Date: _____

III. SITE INFORMATION

A. Incident Category:

- ___ Active Production Facility
- x Inactive Production Facility
- ___ Active Waste Management Facility
- ___ Inactive Waste Management Facility
- ___ Midnight Dumping: five drums leaking in
residential neighborhood
- ___ Transportation Related
- ___ Other (specify):.

B. Site Location

1. Site description

a. Removal Site Evaluation

The Belcher/Robinson Foundry, located in Alexander City, is an abandoned ductile iron/grey iron foundry. EPA ERRB responded to a request from ADEM to address releases emanating from leaking drums and tanks on site. Initial reports from ADEM indicate the presence of an AST containing oil, several dozen drums containing hydraulic oil and sulfuric acid, plastic totes of various sizes, and paint cans. OSCs Alyssa Hughes and Stephen Ball deployed with START contract resources to assess the extent of contamination and ensure stabilization.

b. Physical location and Site characteristics

The site consists of 3 parcels of land totaling approximately 10 acres. There are 2 large warehouses, one smaller storage building, and one office building. A fence surrounds the property, but there are several locations where the fence line is breeched. The facility is located in a mixed residential/commercial area. There is an unnamed small creek that leads to the Carlisle Branch located along the northeastern border of the Site. A group of drums labeled Sulfuric Acid are located approximately 20 feet from the Creek. There is substantial staining along the runoff pathway leading to the creek.

OSC Hughes served the property owners with a Notice of Federal Interest informing them that the observed concerns would require some sort of action to stabilize the Site. The responsible party was willing to work towards securing the Site.

The facility filed for bankruptcy in 2006. The county took ownership of the three parcels of land composing the property following failure to pay taxes.

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

At the time of the initiation of the emergency response, the materials in the drums were unknown but the potential for release threatened to impact the environment and nearby populations. The results of hazard categorization testing indicated the presence of oil, chlorinated oils, acids, bases and chlorinated solids.

d. Maps, pictures, and other graphic representations will be posted on www.epaossc.net.

2. Description of threat

Explanations of how this release or threat of release meets the criteria for threats to public health or welfare or the environment in section 300.415 (b) (2) of the NCP are discussed below.

- ☒ a. 300.415(b)(2)(i) "Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.": this material was released in a mixed industrial/residential neighborhood within 20 feet of a running stream.
- ☐ b. 300.415(b)(2)(ii) "Actual or potential contamination of drinking water supplies or sensitive ecosystems."
- ☒ c. 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 drums found on this Site were discovered open and leaking to the environment.
- ☒ d. 300.415(b)(2)(iv) "High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.": At the time of the initiation of the emergency response, the contaminant levels in surface soils are unknown. The foundry sand is suspected to contain high levels of metals.
- ☒ e. 300.415(b)(2)(v) "Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released." Significant rains have impacted the area in the recent past. There is evidence of staining in the

drainage pathway that indicates that release to the surface water has taken place.

- X f. 300.415(b)(2)(vi) "Threat of fire or explosion.": Due to the unknown nature of the materials in the drums, a threat of fire or explosion does exist.
- X g. 300.415(b)(2)(vii) "The availability of other appropriate federal or state response mechanisms to respond to the release.": The Alabama Department of Environment and Management requested the assistance of federal resources to stabilize the Site.
- h. 300.415(b)(2)(viii) "Other situations or factors that may pose threats to public health or welfare of the United States or the environment.":

ATSDR has not conducted a health assessment. Health advisories, consultations, or other health risk advice are attached, if such documents exist.

C. Preliminary Assessment/Site Inspection Results:

No previous actions have been taken on-site. When ADEM officials arrived, the Site was immediately referred to ERRB for an emergency response action.

IV. RESPONSE INFORMATION

A. Situation

1. **Current situation:** From the Start date to the date of this document, the weather has been slightly above seasonal temperatures with low temperature ranges of 70° to 80° F and high temperature ranges of 80° to 100° F. There has been no media involvement for this Site.

2. **Removal activities to date**

- a. Federal Government/Private Party

The USEPA mobilized to the Site on 8JUN09. The response actions initiated by the Federal Government/Responsible Party

include:

sampling and analysis: hazard characterization field screening of all the containers was conducted on-site. Samples were compiled and sent to the lab for waste stream analysis.

waste containment and cleanup activities: all of the containers were staged in 2 separate areas depending on location. Two of the drums required overpacking prior to transporting to the staging area. All of the empty containers were staged in order to deter trespassers from entering the facility.

community relations activities: None

other activities: None

These actions are those taken to stabilize the Site. Once the analytical results are returned, all of the material will be disposed of at CERCLA approved off-site locations. The Site will then be considered for removal site evaluation.

b. State/Local

Alabama DEM referred the Site due to an inability to respond. All Site activities will be communicated with the State and Local government officials.

3. Enforcement¹

The PRPs have been identified and are willing to complete any additional on-site activities.

The following enforcement actions have been initiated by EPA or the State:

- the property owners formerly operated the facility on-site. They have been contacted and are willing to assist in any future on-site activities.
- the PRPs were served with a Notice of Federal Interest by the responding OSC.

¹ Enforcement strategy is not part of the Action Memo for purposes of NCP consistency.

_____ administrative orders issued: None
x other: None.

B. Planned Removal Actions

1. Proposed action description

The specific tasks involved in the proposed response to the threats include:

X Containment and Countermeasures: actions conducted by EPA and EPA contractors.

X Cleanup, Mitigation and Disposal: overpack drums and transport them to a safe location (warehouse) for thorough characterization and eventual disposal.

_____ Restoration: None

x Analytical: analytical of waste materials will be conducted commensurate with disposal profiling.

_____ Other: None.

Any off-site disposal will be in compliance with the CERCLA off-site disposal policy. The rationale for choosing the response action, supporting data for the decision, and the technical feasibility and probable effectiveness of the proposed action include the OSCs observation of multiple target receptors most notably the nearby residential community and stream.

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. Description of Alternative Technologies

The following alternatives to land disposal have been considered: none.

4. ARARs

The Federal ARARs identified for the site include:
None.

5. Project schedule

The removal action is anticipated to be complete at this time.

C. Next Steps

Once the analytical sampling results are received, the disposal facilities will be selected. The material will be disposed of at approved off-site facilities.

The Site attorney is pursuing future enforcement activities.

There are no meetings with local authorities and community relations activities planned.

D. Key Issues

The following are problem areas or issues of concern: None.

V. COSTS

Extramural Costs:

	Ceiling	Costs To Date
ERRS	\$ 90,000	\$ 10,000
IAGs		\$, \$
Cooperative Agreements/Letter Contracts ...	\$,	\$,
START	\$ 20,000	\$ 6,000
CLP	\$,	\$,
REAC	\$,	\$,
Extramural Contingency	\$ 10,000	\$,
TOTAL, EXTRAMURAL COSTS	\$ 120,000	\$16,000

Intramural Costs:

Direct Costs (Region, HQ, ERT)	\$ 5,000	\$ 500
Intramural Indirect Costs	\$,	\$,
TOTAL, INTRAMURAL COSTS	\$,	\$,

TOTAL PROJECT CEILING/SITE COST	\$125,000	\$,
Project Funds Remaining (percentage)		10%

The Project Ceiling has been approved by the OSC as documented in this Action Memo / Initial Pollution Report. The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor. Other financial data, which the OSC must rely upon, may not be entirely up to date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

VI. DISPOSITION OF WASTES

WASTE STREAM	WASTE CODE	MEDIUM	QUANTITY	CONTAINMENT/ TREATMENT/DISPOSAL METHOD	DISPOSAL LOCATION
OIL					
CHLORINATED OIL					
PETROLEUM CONTAMINATED WATER					
OIL/WATER					
ACIDS					
BASES					
UNPUMPABLE OILS					
CHLORINATED SOLIDS					

VII. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances, pollutants or contaminants from this site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

VIII. 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 and the environment. The worst-case scenario is a community member to be burned by the chemicals or a chemical fire.

IX. OUTSTANDING POLICY ISSUES

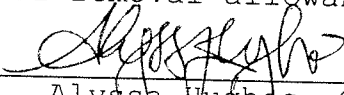
The following remaining policy issues are associated with the site:

____ None
____ Policy Issues: None

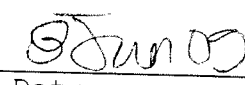
X. APPROVAL

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)(2) criteria for a removal and through this document, I am approving the proposed removal actions. The total project ceiling is \$125,000, of which an estimated \$125,000 will be funded from the Regional removal allowance.



Alyssa Hughes, OSC



Date