

Railroad Street Drums
Site

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CONFIDENTIAL

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

Date: 22MAR09

Subject: Railroad Street Drums
17 Railroad Street
Haralson, GA

From: Randy B. Nattis, OSC, Region IV

To: Regional Response Center, 4SF-ERRB
Ted Jackson, Chief Emergency Response, GA EPD

I. PURPOSE

The purpose of this memorandum is to document the decision to initiate emergency removal/ stabilization actions described herein for the Railroad Street and Former Cotton Mill Drum Site located at 17 Railroad Street, Haralson, Coweta County, Georgia, 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: A4YP	Delivery Order No: 0704-F4-0045
	DO Amount: \$ 50,000.00
	Contractor: Environmental Restoration
CERCLIS No: _____	ERNS No: _____
Response Authority: CERCLA	NPL Status: No
State Notification: 12MAR09	Start Date: 13MAR09
Demobilization Date: _____	Completion Date: ____/____/____

III. SITE INFORMATION

A. Incident Category:

- ☐ Active Production Facility
- ☒ Inactive Production Facility: abandoned material / drums, containers and ASTs
- ☐ Active Waste Management Facility
- ☐ Inactive Waste Management Facility
- ☐ Midnight Dumping
- ☐ Transportation Related
- ☐ Other (specify):.

B. Site Location**1. Site description****a. Removal site evaluation**

EPA Region 4 received notification from GA EPD at approximately 1500 hours on Thursday 12MAR09 that the owner of 17 Railroad street site has not complied with the Notice of Violation. At the request of GA EPA, EPA mobilized to the site on 13MAR09 due to Suspect hazardous material releases over time at closed agricultural facility in Haralson, GA. Property owner claims the inability to fund the removal of abandoned chemicals, although he has begun to remove some containers from the property without proper transportation or disposal manifests. EPA evaluated the site and stabilized containers of suspect hazardous materials.

OSC Nattis and START consultant Tetra Tech mobilized to the Site to conduct hazard categorization field screening and to verify Site conditions. OSC Nattis, GA EPA and START conducted site tour, including air monitoring of various container storage areas. No readings above background concentrations on either PID or FID. Numerous 55-gallon and 30-gallon drums as well as smaller containers observed in various buildings at the site stored haphazardly (double-stacked, laying on side, collapsed roof, questionable structural integrity of buildings, etc).

Observations and label information for various containers at the site included: Tox M Parathion', 'Insecticide Spray', 'Calcium Carbide' (1-pint container in same room as batteries) numerous lead-acid batteries (some cracked open), three ASTs (estimated 5,000-gallon size for each) located at 17th St area (one reportedly used as 'abort' tank for unusable materials - owner reported mixing of potash, liquid nitrogen, and liquid phosphorous fertilizers); bagged red powder labeled 'Soybean'

Collected 3 waste samples as summarized below (laboratory analyses include VOCs, SVOCs, organophosphorous pesticides, triazine herbicides,

organochlorine pesticides, chlorinated herbicides, N-methylcarbamates, TAL metals (incl mercury), and pH:

WS-01: collected from the 30-gallon drum (labeled 'Kleen-O-Brite') that is stored in the dilapidated wooden structure behind (east of) the Fertilizer Shed - drum was less than one-quarter full. Material was a clear to cloudy liquid with visible suspended particulates.

WS-02: collected from the bagged red powder stored in the building identified by Mr. Wilkerson as the bag & seed area. A stenciled label on the bag reads 'SOYBEAN'

WS-03: collected from the bagged materials in the Fertilizer Shed. Bags are labeled 'STA-GREEN Nursery Special with Systemic Insecticide'

Collected 3 waste samples as summarized below (same analyses as waste samples; S-03 also includes TPH-GRO and PCBs):

S-01: composite soil sample collected from the small drainage channel (stressed vegetation) leading from the northeast corner of the Fertilizer Shed

S-02: composite soil sample collected from inside the Fertilizer Shed in the vicinity of the drums labeled as 'Tox M Parathion'

S-03: composite soil sample collected from the area where drums of reported used motor oil were stored near the northwestern corner of the cotton gin building.

b. Physical location and Site characteristics

The Site consists of more than 5 acres and is located in a downtown Haralson, GA at 17 Railroad street in Haralson, Coweta County, Georgia (33.2253 latitude and --84.5703 longitude) which is a mixed residential and commercial area. The Site is owned by Frank Wilkerson P.O. Box 116 - Main Street, Haralson, Georgia 30229.

The nearest population is within 10 feet of the Site and it is estimated that the population

within a one-mile radius of the Site is in the hundreds. The following vulnerable populations, habitats, and natural resources were impacted: soils around the ASTs and in and around both Buildings Number 1, 2, 4 and the 17 Railroad street building. High potential for a release to migrate to a drainage pathway down gradient from site as well as vegetation and soil along the pathway.

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

The materials known on site include: 4,4-dichlorodiphenyldichlorethane (DDD), 4,4-dichlorodiphenyldichlorethylene (DDE), 4,4-DDT, aldrin, alpha-BHC, gamma-BHC (Lindane), dieldrin, toxaphene, 4,4-DDT, and alpha-BHC.

The past releases are via leaking or damage drums migrating into the surrounding soils.

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.

 X 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 residential and commercial area with a population within 10 feet of known releases.

 X b. 300.415(b)(2)(ii) "Actual or potential contamination of drinking water supplies or sensitive ecosystems." There is potential that down stream users may withdraw water for potable purposes; an addition sampling effort will be organized in the near future.

 x 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 and ASTs found on this Site were discovered to have leaked 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.": Drainage pathway right through the storage area in Building 1. Contents of drums were evident in known pathways.
- ☒ e. 300.415(b)(2)(v) "Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released." Rains have been regular events this spring in Atlanta. If left unattended the released material would have undoubtedly migrated to a larger area along the surface water pathway.
- ☒ f. 300.415(b)(2)(vi) "Threat of fire or explosion.": There is definitely a threat of fire for the materials released and abandoned at this Site.
- ☒ g. 300.415(b)(2)(vii) "The availability of other appropriate federal or state response mechanisms to respond to the release.": GA EPD does not have sufficient resources to provide for appropriate disposal of the waste.
- ☐ 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:

A Preliminary Assessment/Site Inspection has been performed at this Site prior to the OSC Removal Site Evaluation by GA EPA. Please see EPAOSC.NET for the Notice of Violation.

IV. RESPONSE INFORMATION

A. Situation

1. **Current situation:** From the Start date to the date of this document, the weather has been seasonal with low temperature ranges of 20° to 40° F and high temperature ranges of 50° to 80° 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 13MAR09. The response actions initiated by the Federal Government/Responsible Party include:

sampling and analysis: Refer to the Removal Site evaluation section for the sampling information. START contractor Tetra Tech will have appropriate analysis conducted to facilitate appropriate treatment/disposal

waste containment and cleanup activities: some drums and containers were over packed in sound 85-gallon steel and poly drums.

community relations activities: None

other activities: None

These actions have been effective in mitigating the threat to the public health, welfare and environment. These current actions will correlate with the planned removal actions.

- b. State/Local

GA EPD requested EPA's assistance with the Site. No State or other agency personnel remain at the site. There is potential for continued emergency response or removal action on site depending on analytical results from waste and soil. A groundwater investigation is also warranted.

3. **Enforcement¹**

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

The PRP are only suspected. They have responded to attempts to contact them and issued EPA a site tour and access. Therefore they have participated in this emergency removal action and may be able to do the removal actions required.

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

- ☒ notification letters delivered to office of PRP by OSC Randy B. Nattis.
- ☐ administrative orders issued: None
- ☐ other: None.

B. Planned Removal Actions

1. Proposed action description

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

- ☒ Containment and Countermeasures: Possible berm built to divert water flow around building number 1
- ☒ Cleanup, Mitigation and Disposal: Overpack and stage drums for characterization and eventual disposal.
- ☐ Restoration: None
- ☒ Analytical: analytical of soils and waste materials will be conducted commensurate with determination of threat and disposal profiling.
- ☒ Other: Possible groundwater investigation depending on results from soil analysis.

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 community members 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: pending analytical data the OSC will consider treatment technologies including stabilization/solidification.

4. ARARs

The Federal ARARs identified for the site include: None.

5. Project schedule

The removal action is anticipated to be completed within one year of the Start Date listed in Section II of this document.

C. Next Steps

There is no future activities planned after the removal activity described above.

The following enforcement activities are planned: discuss this Site with an assigned attorney and cost recovery personnel.

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	\$ 50,000	\$ 15,000
IAGs		\$, \$
Cooperative Agreements/Letter Contracts ...	\$,	\$,

START	\$ 80,000	\$ 20,000
CLP	\$,	\$,
REAC	\$,	\$,
Extramural Contingency	\$ 18,000	\$,
TOTAL, EXTRAMURAL COSTS	\$ 108,000	\$,

Intramural Costs:

Direct Costs (Region, HQ, ERT)	\$ 10,000	\$ 2,000
Intramural Indirect Costs	\$,	\$,
TOTAL, INTRAMURAL COSTS	\$,	\$,

TOTAL PROJECT CEILING/SITE COST	\$158,000	\$ 37,000
Project Funds Remaining (percentage)	65%	

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

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:

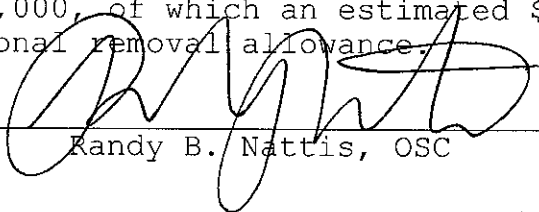
☐ None
☐ Policy Issues: None

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 \$158,000, of which an estimated \$158,000 will be funded from the Regional removal allowance.



Randy B. Nattis, OSC

3/20/2009

Date