

\$250,000/\$50,000 Action Memorandum¹

SUBJECT: Action Memorandum for a Removal Action at the Old River Road Transformer site pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104.

FROM: Randy B Nattis, OSC
Emergency Response and Removal Branch

THRU: Matt Taylor, Chief
Emergency Response Branch

TO: The File

I. Purpose

The purpose of this memorandum is to document the decision to initiate emergency response actions described herein for the Old River Road Transformer Site located in Juliette, Monroe County, Georgia pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104.

II. Site Information

A. Site Description

Site Name: Old River Road Transformer
Superfund Site ID (SSID): B422
NRC Case Number: 921099
CERCLIS Number:
Site Location: Old River Road, Juliette, Monroe County, Georgia
Lat/Long: 33.09518, -83.78177
Potentially Responsible Party (PRP): N/A
NPL Status: No
Removal Start Date: 20OCT09

B. Site Background

1. Removal Site Evaluation

EPA Region 4 received notification from GA EPD at approximately 1200 hours on Tuesday 20OCT09. OSC Nattis arrived on site at

¹ Regional Administrators may redelegate to designated On-Scene Coordinators (OSCs) the authority to determine the need for emergency response and to approve and initiate removal actions costing up to \$250,000 where site conditions constitute an emergency and up to \$50,000 where site conditions do not constitute an emergency. OSCs must check their specific Regional delegations to determine the level to which they have been granted the programmatic authority to respond to a release or threatened release of a hazardous substance, pollutant, or contaminants. Some Regions may not have fully redelegated this programmatic authority to OSCs.

approximately 1545 and met with owner who unearthed the containers during site construction. OSC Nattis identified the containers and verified the PCB labels and the condition of the containers. At least two of the containers were breached and oils containing PCB materials were leaking into an unlined ditch.

During an interview with the owner, it was determined that 8-10 transformers labeled with PCBs were uncovered during construction. One transformer was breached, releasing PCBs to the soil.

OSC Nattis and ERRS contractor Environmental Restoration containerized soil and transformer units in 5 drums, collected a waste sample for disposal profiling, and staged the drums on-site. A Clor-N-Soil 50ppm field screening test was used to confirm the presence of PCBs above 50ppm. OSC Nattis staged the drums on site.

The key problem includes a potential of other buried items yet to be found.

2. Physical location and Site characteristics

The Site consists of approximately 5 acres and is located in an unpopulated residential area in Juliette, GA on Old River Road in Juliette, Monroe County, Georgia (33.09518° latitude, -83.78177° longitude).

The nearest population is within 500 feet of the Site and it is estimated that the population within a one-mile radius of the Site is less than 100. The following vulnerable populations, habitats, and natural resources were impacted: Soils surrounding the transformers. There is a potential for the release to migrate to a running stream approximately 500 feet down gradient as well as vegetation and soil along the pathway to the stream.

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

The materials known on site include: PCBs above 50 ppm based on field screening. The chemicals are CERCLA hazardous substances.

No non past releases were evident.

III. Threats to Public Health Welfare or the Environment

A. Nature of Actual or Threatened Release of Hazardous Substances, Pollutants or Contaminants.

Known hazardous materials: PCBs to soils and within 500 feet of the Flint River. There is potential that down stream users may withdraw water for potable purposes; however, there are no known users at this

time. The containers found on this Site were discovered buried on-site and unearthed during constructions activities. The PCBs stained the soils and when warms, becomes lighter and less viscous and has the potential of moving deeper into the adjacent soils. Rains have been regular events this fall in Atlanta. If left unattended the released material would undoubtedly migrate along the surface water pathway. GA EPD does not have sufficient resources to provide for appropriate clean up and disposal of the wastes.

B. Check applicable factors (from 40 CFR 300.415) which were considered in determining the appropriateness of a removal action:

- ☐ * Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants [300.415(b)(2)(i)].
- ☐ * Actual or potential contamination of drinking water supplies or sensitive ecosystems [300.415(b)(2)(ii)].
- ☐ * Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that pose a threat of release [300.415(b)(2)(iii)].
- ☐ * High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate [300.415(b)(2)(iv)].
- ☐ * Weather conditions that may cause hazardous substances or pollutants to migrate or to be released [300.415(b)(2)(v)].
- ☐ * Threat of fire or explosion [300.415(b)(2)(vi)].
- ☐ * The availability of other appropriate federal or state response mechanisms to respond to the release [300.415(b)(2)(vii)].
- ☐ Other situations or factors that may pose threats to the public health or welfare of the United States or the environment [300.415(b)(2)(viii)].

IV. Endangerment Determination under CERCLA Section 104: Pollutant or Contaminants

N/A

V. Selected Removal Action and Estimated Costs

A. Situation and Removal Activities to Date

1. Current Situation.

From the Start date to the date of this document, the weather has been seasonal with low temperature ranges of 40° to 50° F and high temperature ranges of 50° to 70° F. Rain has been heavy at times during the fall months and little evidence of the current weather pattern changing. 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 20OCT09. The response actions initiated by the Federal Government/Responsible Party include:

Sampling and analysis: Hazard characterization field screening, bulking, disposal profiles, sediment and soil sample thus far. ERRS contractor ER has appropriate analysis conducted to facilitate appropriate treatment/disposal

Waste containment and cleanup activities: All containers have been bulked and or over packed as needed.

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. GA EPD took no actions. No State or other agency personnel are on site. There is little potential for continued State/local response or any future role.

3. Enforcement

OSC Nattis has talked with PRP and tried to issue a NOFI but the PRP / owner refused to sign and take the letter.

B. Planned Removal Actions

1. Proposed action description

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

Containment and Countermeasures: Actions conducted by EPA and ERRS.

Cleanup, Mitigation and Disposal: Over pack, bulk and stage all containers for profile and disposal.

Restoration: Soil and Sediment removal if necessary;

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

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. ARARs

None

4. 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. Estimated Costs*

Contractor costs (ERRS/START staff, travel, equipment)	\$20.000
Other Extramural Costs (Strike Team, other Fed Agencies)	
Contingency costs (20% of subtotal)	
Total Removal Project Ceiling	\$20.000

*EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA."

VI. 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 health and/or the environment.

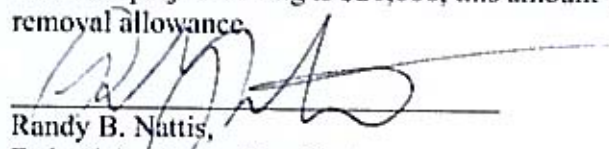
VII. Outstanding Policy Issues

None

VIII. Approvals

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) criteria for a removal action and through this document; I am approving the proposed removal actions. The total project ceiling is \$20,000, this amount will be funded from the Regional removal allowance.


Randy B. Nattis,
Federal On-Scene Coordinator

10/28/2009
Date