

\$250,000/\$50,000 Action Memorandum¹

SUBJECT: Action Memorandum for a Removal Action at the Powder Springs Road Plating 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 Powder Springs Road Plating Site located in Austell, Cobb County, Georgia pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104.

II. Site Information

A. Site Description

Site Name: Powder Springs Road Plating
Superfund Site ID (SSID): B443
NRC Case Number:
CERCLIS Number:
Site Location: 5491 Austell Powder Springs Rd, Austell, Cobb County, Georgia
Lat/Long: 33.820186, -84.642014
Potentially Responsible Party (PRP): N/A
NPL Status: No
Removal Start Date: 23OCT09

B. Site Background

1. Removal Site Evaluation

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.

EPA Region 4 received notification from GA EPD at approximately 1500 hours on Friday 23OCT09 that GA EPD just completed a walk through of the plating facility and saw chromic acid dumped from the plating vats onto the ground, which was flowing out of the facility, through the parking lot and heading towards Sweetwater Creek. GA EPA was notified earlier in the week from the Cobb County water department during a permitting trip that the facility was in disarray and there was evidence and a continuing threat of a hazardous material discharge from the facility. No actions were taken on site prior to the OSC Nattis and START consultant Tetra Tech mobilized to the Site to conduct hazard categorization field screening and to verify Site conditions. An immediate observation at the Site depicted containers, drums, totes and vats all containing incompatibles and appeared unstable. There was a Ph of 2 / 3 solution (chromic acid) leaving the facility from the floor, under the side of the building and out in the parking lot. The weather conditions were heavy rains, which helped propagate the chromic acid to the edge of the property where it settled into a bermed area.

HAZCAT screening indicated that the solutions in the containers ranged from acids with a pH of 0 to bases with a pH of 14. Also included were Basic and Acidic Solids, Cyanide Solids and waste Oil.

There was visible evidence of dumping from one of the chroming vats onto the ground as a siphon lay over the wall of the vat. The pH of the solution in the plating vat was a 2. Additional sampling showed the sediments with in the building contained ~30,000 ppm of Hexavalent chromium, which was propagated to the outside of the building.

The key problem areas of the site include sediments containing Hexavalent chromium in which create an acid solution when it rains and an inhalation hazard on dry breezy days. The Sweetwater Creek is within 500 feet of the Site.

2. Physical location and Site characteristics

The Site consists of approximately 2 - 3 acres and is located in an industrial / residential neighborhood in Austell, GA at 5491 Austell Powder Springs Rd in Austell, Cobb County, Georgia (33.8216286° latitude and -084.6429777° longitude). The Site is owned by William "Ren" Doughty.

The nearest population is within 50 feet of the Site (directly next door, recycling center and mechanics shop) and it is estimated that the population within a one-mile radius of the Site is in the thousands. The following vulnerable populations, habitats, and natural resources were impacted: the asphalt parking lot, soils and atmosphere immediately surrounding the drums. High 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: 2462 gallons of Chromic Acid liquids, 556 gallons of Neutral liquids, 550 gallons of oil, 318 gallons of Basic Solids, 186 gallons of Basic liquids, 28 gallons of Acidic solids and 8 gallons of Cyanide solids. The chemicals are CERCLA hazardous substances.

The past releases are via dumping and poor operating procedures and the Atlanta 2009 floods that took place in September. An unknown volume of material has been released, but estimates are in the 100's of gallons and have migrated (and continue to migrate in the rain) in a down gradient direction.

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 (Chromic Acid), were released in a busy industrial / residential neighborhood within 500 feet of the Sweetwater Creek. 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 dumped to the environment. Chromic Acid solution has migrated and continues to migrate with each rain event. The solution stains the soils and when dries, leaves Hexavalent chromium with in the sediments. Rains have been regular events this fall in Atlanta. If left unattended the released material would undoubtedly migrate to a larger area along the surface water pathway. There is definitely a threat of fire for the materials released and abandoned at this Site due to incompatibles improperly stored adjacent to each other. 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 most of the removal activities.

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 23OCT09. 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: Site security has been provided by the Austell PD and a fence has been erected to help prevent trespassers.

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. The GA EPD were the people on site. GA EPD took no actions. No State or other agency personnel remain at the site. There is little potential for continued State/local response or any future role.

3. Enforcement

The operators are only suspected. They have responded to attempts to contact them and have assisted in indenting unknown containers on site. However, they have denied any wrong doing on site and therefore they have not participated in this emergency removal action. OSC Nattis contacted CID for further investigation to the extent practicable.

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;
 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*

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| Contractor costs (ERRS/START staff, travel, equipment) | \$248.000 |
| Other Extramural Costs (Strike Team, other Fed Agencies) | |
| Contingency costs (20% of subtotal) | |
| Total Removal Project Ceiling | \$248.000 |

*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.

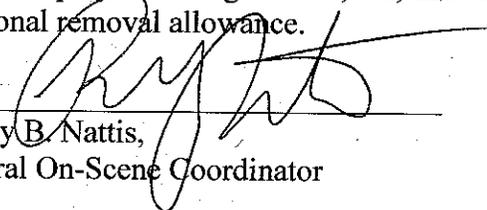
VII. Outstanding Policy Issues

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 \$248,000, this amount will be funded from the Regional removal allowance.



Randy B. Nattis,
Federal On-Scene Coordinator

10/28/2009
Date