# United States Environmental Protection Agency Region IV POLLUTION REPORT

Date: Thursday, March 12, 2009

From: Jennifer Wendel

**Subject:** On going Removal Activities for 3/2 to 3/6/09

Ecusta Mill

1 Ecusta Road, Pisgah Forest, NC

Latitude: 35.2711000 Longitude: -82.7050000

POLREP No.: 13 Site #: A4AK

**Reporting Period:** 3/2 to 3/6/09 **D.O.** #:

**Response Authority: CERCLA Start Date:** 9/22/2008 **Response Type: Mob Date:** 9/22/2008 Time-Critical **Demob Date: NPL Status:** Non NPL **Completion Date: Incident Category:** Removal Action EP-W-05-053 **CERCLIS ID #:** NCD003166675 Contract #

RCRIS ID #:

### **Site Description**

The Ecusta Mill is a former flax pulping and paper manufacturing facility that was built in 1939 and was operational until 2002. Cellophane production also occurred at the facility for approximately 30 years. In addition, the following activities have occurred at the Site: chlorine production operations using Sorenson mercury cells (electro-chemical building); caustic storage; water and wastewater treatment; and printing. EPA's Removal Program and the North Carolina Department of Environment and Natural Resources (NC DENR) first responded when the plant was closed down in 2002. Of primary concern were potential releases from an interruption of power to the basement sumps under the production buildings. The EPA Environmental Response Team conducted sampling of the concrete floor, the subfloor, and soils under the electro-chemical building and sediments in on-site ditches. This sampling confirmed the presence of mercury in the sub-floor structures to 16 feet below ground surface (580 mg/kg) and the floor drains (260 mg/kg) of the electro-chemical building, in the indoor air and in the overland drainage ditches which had received historic discharge from the building.

An Expanded Site Inspection (ESI) was conducted by EPA Region 4, Science and Ecosystem Support Division and the State in March, 2004. The ESI focused on two main areas of concern, the electrochemical building and the Aeration and Sedimentation Basin (ASB) area. Mercury was detected in soils adjacent to the electro-chemical building, in sediments in the on-site drainage ditches and in sediments of the Davison River immediately adjacent to the manufacturing area. The ESI also confirmed soils and sediments in other areas of the site are contaminated with mercury and dioxin. Groundwater sampling has confirmed low-levels of mercury in groundwater near the electro-chemical building, low levels of carbon disulfide and 1,1-Dichloroethane near the cellophane plant, and a high pH reading (pH 12.17) in the area of a previous caustic spill.

The total Site is approximately 527 acres in a mixed-use residential/industrial area. The manufacturing facility is approximately 213 acres. The ASB has a surface area of approximately 75 acres and was used for wastewater treatment. The ASB also receives storm water from approximately one-third of the site, including those areas historically most actively involved in paper production. The following industrial solid waste landfills are located at the Site: the Island landfill, the new ash landfill; the old ash and sludge landfills which are unlined industrial landfills which do not have permit numbers issued. The previous site owner is in the process of closing all landfills in compliance with State permit requirements.

A small arms firing range has been historically operated on the Site south of the main manufacturing operations on a largely undeveloped parcel of land near the confluence of the Davidson and French Broad Rivers. Lead impacted soil has been document from the historic firing range.

Renova Partners, a Brownfields redevelopment company purchased the property in January 2008. Renova formed a subsidiary company Davidson River Village, LLC (DRV) who is conducting complete demolition of all on-site structures prior to site redevelopment. D.H. Griffin was retained by

DRV to conduct the demolition.

DRV is conducting the Removal Activities at the site under an AOC with EPA. They have hired Shaw Environmental as the lead environmental contractor. Removal Activities include a Time Critical Removal Action and 2 Non-Time Critical Removal Actions.

#### **Current Activities**

Shaw continuing sampling crushed concrete/brick debris.

Shaw performing field survey of the coal yard to determine capacity for cellophane soil placement.

DH Griffin shipping loads of scrap metal to DH Griffins Greensboro office for recycling.

DH Griffin shipping lead impacted brick to Republic landfill.

DH Griffin continuing demolition of buildings 60,62.

DH Griffin continuing crushing operations in the north end of the site.

DH Griffin continuing demolition of building slabs 16,20,87,88.

DH Griffin continuing removing utilities behind building 62.

DH Griffin continuing perimeter dust monitoring.

Mountain Environmental completing removing weak liquor from building 56 chests and transferring to the clarifier.

DRV continue discharging from the north clarifier into the ASB.

Shaw continue slab assessment activities in building slabs 75,87.

Shaw collecting samples from crush material for lead analysis.

Shaw completing slug testing and the step drawdown test in the caustic area.

#### **Planned Removal Actions**

Shaw and DH Griffin will continue the building clearance process.

Shaw will continue collecting samples for crushed debris.

DH Griffin demolition activities will continue in buildings cleared.

DH Griffin will continue loading out scrap, C&D debris and non-hazardous materials.

DH Griffin will continue removing utilities less than 4 ft below ground level.

DH Griffin/ Shaw will continue slab removal and investigation process.

DH Griffin and Mountain Environmental will continue with OHM material T & D.

DH Griffin will continue T & D of lead impacted brick.

JD Galloway will begin T & D of starch.

Shaw will continue site wide sub slab analysis and documentation.

 $State/federal\ regulators\ will\ continue\ to\ investigate\ arsenic\ soil\ background\ levels.$ 

Shaw will install additional wells near the caustic area and begin pump and slug testing.

# **Next Steps**

Mike Singer discusses the desire to investigate on site treatment of water generated form site activities, in part due to the mercury issues. Jennifer mentions that DWQ will have the final say.

## **Key Issues**

Shaw is awaiting the results for collected environmental samples from the geotech borings.

The drillers and Shaw are still developing a plan to perform the deep samples at the seven ditch transects.

Olin final report is coming soon will be delayed will a re-excavation for shallow PAH exceedences is conducted at SB-03.

Jennifer asked about the "clean criteria" for the black liquor chests debris. Mike Singer responded the debris could be washed to visually clean but that black liquor is not a site contaminant of concern.

## **Disposition of Wastes**

DH Griffin shipped 32 loads of scrap metal weighing 565 tons to DH Griffins Greensboro office for recycling.

DH Griffin began shipping lead impacted brick to Republic landfill, 2 loads weighing 35 tons were shipped.

Mountain Environmental completed removing weak liquor from building 56 chests and transferring to the clarifier. A total of 28 loads have been removed and placed into the clarifier.

Approximately 84,000 gallons of weak liquor were transferred to the clarifier.

DRV continued discharging from the north clarifier into the ASB.

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