

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Monday, March 23, 2009

From: Jennifer Wendel

To: Christopher Masterson, EPA

Subject: On Going Removal Activities
Ecusta Mill
1 Ecusta Road, Pisgah Forest, NC
Latitude: 35.2711000
Longitude: -82.7050000

POLREP No.:	14	Site #:	A4AK
Reporting Period:	3/9 to 3/13/09	D.O. #:	
Start Date:	9/22/2008	Response Authority:	CERCLA
Mob Date:	9/22/2008	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	NCD003166675	Contract #	EP-W-05-053
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 sub-floor, 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 electro-chemical 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 of crushed concrete debris.

Shaw's structural engineer performed a survey of the EC building to aide demolition planning.

Shaw continuing building clearance process. Building 31 site clearance walk was completed and clearance requirements were identified.

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

DH Griffin shipping construction debris weighing to WCA Landfill for disposal.

DH Griffin continuing demolition of bldgs. 51,60,62. Lead brick is being stripped and separated from the ground floor.

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

DH Griffin continuing demolition of building slabs 16, 60, & 87.

DH Griffin continuing perimeter dust monitoring.

DH Griffin removing carbon from building 15 using a vacuum truck. Carbon is staged for disposal behind building 15.

DRV continuing discharge from the north clarifier into the ASB.

Shaw continuing slab assessment activities in bldg. slabs 75 & 87.

Shaw collected samples from crush material for lead analysis. Analytical results are all below regulatory guidelines.

Shaw collecting samples from soil adjacent to mercury spill at bldg 15.

Mountain Environmental cleaning mercury spill in the SW corner of the second floor of building 15. Approximately 5 oz was collected, <1 oz noted in spill area the remaining mercury was recovered from a flow switch.

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 collection and T & D.

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

DH Griffin will continue removing carbon from building 15.

JD Galloway will begin T & D of starch weather permitting.

Shaw will continue site wide sub slab analysis and documentation.

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

Shaw will continue to monitor transducers in the caustic area wells.

JD Galloway will excavate and stage identified hotspots nears buildings 27,75 and 106.

Shaw will assist identifying excavation limits using on site instrumentation.

Next Steps

The next steps will involve intensive research on steps to possibly remove the interior layer of bricks of the E.C. Building but not to destroy the structure of the facility.

Key Issues

The key issues here is that the suggested activities on the E.C. Building will not allow for moderate support of the structure.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
RST/START	\$200,000.00	\$152,034.67	\$47,965.33	23.98%
Intramural Costs				
Total Site Costs	\$200,000.00	\$152,034.67	\$47,965.33	23.98%

* 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(s). 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.

Disposition of Wastes

DH Griffin shipped 37 loads of scrap metal weighing 559 tons to DH Griffins Greensboro office for recycling.

DH Griffin shipped 12 loads of construction debris weighing 214 tons to WCA Landfill for disposal.

DH Griffin began removing carbon from building 15 using a vacuum truck. Carbon is staged for disposal behind building 15.

Mountain Environmental cleaned up the mercury spill in the SW corner of the second floor of building 15. Approximately 5 oz was collected, <1 oz noted in spill area the remaining mercury was recovered from a flow switch.

response.epa.gov/EcustaMillSite

POLREP #14 Last Updated 3/23/2009