

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Thursday, April 2, 2009

From: Jennifer Wendel

Subject: On going removal activities

Ecusta Mill

1 Ecusta Road, Pisgah Forest, NC

Latitude: 35.2711000

Longitude: -82.7050000

POLREP No.:	16	Site #:	A4AK
Reporting Period:	3/23 to 3/27/09	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 continued sampling crushed concrete/brick debris.

Shaw continued the building clearance process. Towers 10,45,60,61 and stack 62 were cleared for demolition.

DH Griffin shipped 42 loads of scrap metal weighing 640 tons to DH Griffins Greensboro office for recycling.

DH Griffin continued shipping non hazardous materials (fly ash & carbon) to Republic Landfill, 44 loads weighing 795 tons were shipped. Carbon loadout complete.

DH Griffin continued shipping lead impacted brick to Republic landfill, 21 loads weighing 350 tons were shipped.

DH Griffin continued demolition of buildings 15,31,51,62.

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

DH Griffin continued demolition of building slabs 73.

DH Griffin continued perimeter dust monitoring.

JD Galloway shipped 9 loads of starch from AST's 295 and 296 to Republic Landfill.

Mountain Environmental removed residual black liquor from tower 61 cone.

DRV continued discharging from the north clarifier into the ASB.

Shaw continued slab assessment activities in building slab 73, XRF results were below regulatory guidelines.

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

Shaw collected 26 samples from the perimeter of the buffer zone in building 56 and the control room on the south end of building 58. Samples were from several different matrices including pipe insulation, paint chip, wood, brick and concrete. Samples were analyzed for total mercury and analytical results are pending.

Shaw performed daily monitoring of building 89 soil stockpiles. Elevated PID readings were recorded above the bldg 27 stockpile on warmer days.

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.

DH Griffin will continue demolition of water towers.

Shaw will continue site wide sub slab analysis and documentation.

Shaw will complete transducer data collection efforts in the caustic area wells.

JD Galloway will excavate and stage hotspot soil exceeding regulatory guidelines.

Shaw will collect groundwater samples for VOC's on MW 11 adjacent to building 27 slab.

Key Issues

State/federal regulators will continue to investigate arsenic soil background levels Shaw will generate a Tech Memo regarding the arsenic soil management on site for NCDENR Brownsfields review.

EPA Jennifer Wendell wants a geophysical survey of the north pipe coming out of the pit at building 27. She feels that this is where the gasoline is coming from. She also wants a sample from monitoring well 11 just to the southwest of the area.

EPA Jennifer Wendell asked if the water treatment system would be for the EC building. Mike Singer, Renova, stated that at this point he didn't want to rule anything out and it was possible the treatment system would be used for the EC building waters.

Disposition of Wastes

DH Griffin shipped 42 loads of scrap metal weighing 640 tons to DH Griffins Greensboro office for recycling.

DH Griffin continued shipping non hazardous materials (fly ash & carbon) to Republic Landfill, 44 loads weighing 795 tons were shipped. Carbon loadout complete.

DH Griffin continued shipping lead impacted brick to Republic landfill, 21 loads weighing 350 tons were shipped.

JD Galloway shipped starch from AST's 295 and 296 to Republic Landfill, 9 loads weighing approximately 142 tons were shipped.

Mountain Environmental removed residual black liquor from tower 61 cone.

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