

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Monday, April 13, 2009

From: Jennifer Wendel

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

POLREP No.:	17	Site #:	A4AK
Reporting Period:	3/30 to 4/3/09	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 continue sampling crushed concrete/brick debris.

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

DH Griffin continue shipping non hazardous materials (fly ash) to Republic Landfill.

DH Griffin continue shipping lead impacted brick to Republic landfill.

DH Griffin continue demolition of buildings 15,31,51.

DH Griffin continue crushing operations in the north and south ends of the site.

DH Griffin continue demolition of building slabs 73.

DH Griffin continue perimeter dust monitoring.

DRV continue discharging from the north clarifier into the ASB.

Shaw continue slab assessment activities in building slab 63.

Shaw collecting samples from crush material for lead analysis.

JD Galloway excavating the PAH hot spot locations at building 75 and 106. Shaw collecting samples from the excavated areas which include the east wall of 75 and all four walls of the hotspot at 106.

Shaw collecting groundwater samples from MW 11 for volatile organics at the request of the EPA. MW 11 is in close proximity to the building 27 vault impacted.

Shaw collecting samples from the wooden block floor from the machine shop (building 31) for volatiles and PCB's.

Shaw collecting transducer data from the monitoring wells in the caustic area.

Shaw performing daily monitoring of building 89 soil stockpiles.

Shaw continue to complete the Draft Rifle Range report, the Draft Olin Area report, and the Technical memo for on-site arsenic soil management for NCDENR Brownfields

Shaw continue cost evaluations of on-site water treatment options

TN & Associates continue oversight duties for EPA.

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.

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

Shaw will continue to monitor staged soil in building 89 for volatiles and to sample crushed material for lead analysis.

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

Shaw will issue the Draft Rifle Range report for regulator review as well as the Brownfields Tech Memo

Arrangements for additional deep sampling in the Ditches will be finalized

Key Issues

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

EPA Wendell asked if the water treatment system would be for the EC building. Mike 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 47 loads of scrap metal weighing 815 tons to DH Griffins Greensboro office for recycling.

DH Griffin continued shipping non hazardous materials (fly ash) to Republic Landfill, 38 loads weighing 754 tons were shipped.

DH Griffin continued shipping lead impacted brick to Republic landfill, one load weighing 18 tons were shipped.

JD Galloway excavated the PAH hot spot locations at building 75 and 106.

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