

**United States Environmental Protection Agency
Region IV
POLLUTION REPORT**

Date: Tuesday, March 24, 2009

From: Matthew Huyser

To: Shane Hitchcock, USEPA

Subject: Remobilization delay
Seven Out
901 Francis Street, Waycross, GA
Latitude: 31.2079196
Longitude: -82.3642648

POLREP No.:	6	Site #:	A4FY
Reporting Period:	12/19/2009-3/24/2009	D.O. #:	
Start Date:	1/27/2005	Response Authority:	CERCLA
Mob Date:	1/27/2005	Response Type:	Emergency
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	GAN000407811	Contract #	
RCRIS ID #:			

Site Description

See POLREP #5 for site description and background information.

Current Activities

Between December of 2008 and March of 2009, the remobilization date to begin waste removal activities was altered three times due to various circumstances.

The first delay of remobilization from January 5, 2009 to February 16, 2009 was due the unavailability of analytical sampling data from the laboratory. By December 19, 2008, Winter reported that it had received only a portion of the analytical data for samples that had been submitted. When results were received, Winter requested that eight samples be analyzed for TCLP based on preliminary calculations (using the "20 times" rule of thumb) from the totals analysis numbers that indicated the eight materials may be at or above TCLP regulatory levels. START had collected split samples from two of the eight locations that Winter had identified for TCLP analysis, so the two split samples were analyzed for TCLP as well. TCLP results indicated that solid wastes from two tanks and liquid wastes from two other tanks are hazardous wastes and must be disposed of in that manner.

The second delay of remobilization from February 16 to April 6 was due to the hazardous waste determination from TCLP results and the volume measurements taken in November, 2008 that nearly doubled the anticipated waste volume from 130,000 gallons to 245,000 gallons. Respondents requested that Winter obtain new transportation and disposal cost estimates, and also requested the delay of activities to approve additional funding. The time extension request was made on February 11 and denied by EPA on February 12. A biweekly progress report was submitted on February 13 which described the purpose for a delay and provided an updated project schedule. A letter was sent by EPA to the respondents on February 19 which denied the delay a second time, documented that the hazardous waste determination and additional waste volume was not sufficient grounds for delaying all site work under current conditions, identified errors in the recently submitted project schedule, and requested an improved project schedule.

A revised project schedule was received on March 9 that set the remobilization date to March 25, and was accepted by EPA.

START submitted a draft Sampling Event Letter Report on February 6, 2009 from the November, 2008 sampling event. The report included a comparative analysis of Winter's analytical results with the corresponding split sample results obtained by START. It was observed that several discrepancies occurred between the two sets of results, sometimes at one or two orders of magnitude. However, an OSC review of the comparison concluded that: 1) the discrepancies did not impact disposal decisions or determinations for further TCLP analysis, 2) there was no bias in Winter's results of being consistently

higher or lower than START's results, and 3) trends along particular sets of analytes most likely indicated a difference in laboratory dilutions than errors in sample management or analysis.

Planned Removal Actions

- Implementation of the OSC-approved removal action in accordance with the schedule and requirements of a Removal Action Work Plan (ONGOING);
- Removal of waste material from all tanks, drums, and other containers on the Site, as well as from the secondary containment area;
- Decontamination and/or disposal of all tanks, drums, and other containers on the Site, as well as decontamination of the secondary containment area; and
- Disposal of the waste material removed from the Site, including any sampling and analysis necessary to determine proper treatment and disposal methods.

Key Issues

Winter visited the site on a regular basis to evaluate the condition of three tanks that began irregularly leaking or "weeping" when the containers were agitated by equipment. Inspections on December 31 of 2008, and January 14, January 29, February 12, February 26, and March 16 of 2009 documented observed weeping stains on a few occasions, but no active leaking was observed.

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