

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

**Date:** Thursday, April 16, 2009

**From:** Jennifer Wendel

**To:** Christopher Masterson, EPA

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

<b>POLREP No.:</b>	18	<b>Site #:</b>	A4AK
<b>Reporting Period:</b>	4/6 to 4/10/09	<b>D.O. #:</b>	
<b>Start Date:</b>	9/22/2008	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	9/22/2008	<b>Response Type:</b>	Time-Critical
<b>Demob Date:</b>		<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>		<b>Incident Category:</b>	Removal Action
<b>CERCLIS ID #:</b>	NCD003166675	<b>Contract #</b>	EP-W-05-053
<b>RCRIS ID #:</b>			

**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.

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

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

DH Griffin continued demolition of buildings 15,43,62.

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

DH Griffin continued demolition of building slabs 11,15.

DH Griffin continued perimeter dust monitoring. No dust issues or exceedences were noted.

DRV continued discharging from the north clarifier into the ASB.

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

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

Shaw performed daily monitoring of building 89 soil stockpiles. The highest PID readings were 23 ppm for the week.

TN & Associates continue performing 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.

Shaw will continue site wide sub slab analysis and documentation.

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.

TN & Associates will continue oversight duties for EPA.

### **Estimated Costs \***

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	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
RST/START	\$200,000.00	\$183,469.18	\$16,530.82	8.27%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	\$200,000.00	\$183,469.18	\$16,530.82	8.27%

\* 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 36 loads of scrap metal weighing 858 tons to DH Griffins Greensboro office for recycling.

DH Griffin continued shipping non hazardous materials (fly ash) to Republic Landfill, 23 loads weighing 453 tons were shipped.

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

[response.epa.gov/EcustaMillSite](http://response.epa.gov/EcustaMillSite)

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