United States Environmental Protection Agency Region IV POLLUTION REPORT

Date: Thursday, July 23, 2009

From: David Andrews, On-Scene Coordinator

Subject: Initial/Final

Deep South Power

35 Edgewood Avenue, Thomaston, GA

Latitude: 32.9011000 Longitude: -84.3139000

POLREP No.: 2 Site #: A4ZM

Reporting Period: D.O. #:

Start Date: 7/23/2009 **Response Authority: CERCLA** Mob Date: 7/23/2009 **Response Type:** Time-Critical **NPL Status:** Non NPL **Demob Date:** 7/23/2009 **Completion Date:** 7/23/2009 **Incident Category:** Removal Action

CERCLIS ID #: GAN000410391 Contract #

RCRIS ID #:

Site Description

Deep South Power, LLC (Site) is a former alternative power steam cogenerating plant that used to provide steam to the Thomaston Mills plants neighboring to the north of the property. The plant formerly operated using coal fuel for steam generation and the facility was later purchased by the current owner (RP) who proposed to retrofit the facility to accept an alternate (or supplemental) fuel source. Used tires were the proposed fuel source. According to local authorities, the facility was never fully operational using the alternative fuel steam system and the plant was idle for several years through the last half of this decade. The abandoned site drew the attention of local law enforcement through calls reporting copper thefts and vagrant trespassing. In January 2008 complaints about the property's appearance and County Code violations drew the focus of local law enforcement followed by a resulting referral to the Georgia Department of Natural Resources Environmental Protection Division (GAEPD) by February 2008. In March 2008, GAEPD issued a Notice of Violation (NOV) documenting the Site as an "abandoned facility" containing drums and bulk containers of corrosive chemicals, several drums labeled "Hazardous Waste", and several stockpiles of tires.

In March 2009, GAEPD referred the Site to EPA for a Removal Site Evaluation (RSE) to address the abandoned drums of chemicals and any additional site contamination or issues that may not have been identified by GAEPD through their previous site investigations.

Current Activities

On July 23, 2009 the OSC returned to the Site and met with the responsible party (RP) to tour the Site, examine the corrective actions, and discuss any pending environmental issues. The RP and OSC examined the areas of concern that was part of the OSC's Site visit on April 25, 2009. The primary areas of concern were the storage of chemicals (drummed and bulk quantities) and effective security of the property & premises over prolonged periods of time. The front gate and main building were locked and the other buildings were rigged to prevent easy access. The majority of the drums were located in the main building and staged inside small plastic pools (i.e. "kiddie-pools") which serve as spillage containment. The two poly-tanks ("Caustic" and "Acid") on the east-side of the main building had locked valves and containment is effectuive and built-in to the pad foundation. The grounds and perimeter fencing presented as unchanged from the April 25, 2009 Site visit and stockpiles of tires continue to remain under cover or closed-off inside auxiliary buildings and one cargo van. There were no evidence of chemical spillage from any of the site containers.

Planned Removal Actions

At this time, the site does not meet the requirements for continuing a time-critical removal action.

Though the facility is not in production or operation and premises unattended for long periods of time, the property is not abandoned and the RP conducts periodic visits to the site for housekeeping or property maintenance and landscaping.

The drums, containing primarily water-treatment chemicals and petroleum-based lubricants, are locked within the main building and cannot be easily accessed. Most of the drums/containers are staged within small plastic pools (aka "kiddie pools") to prevent spillage to the ground. Additionally, the floor in the main building and the chemical pad under the bulk poly tanks are configured to contain spillage. The auxiliary buildings are either rigged to prevent easy access or nailed shut.

The OSC did not identify or document any signs of a release or spill to the site property.

Though the property is vulnerable to trespassing on the eastern boundary, no signs of forced-entry were documented at any of the buildings.

Next Steps

Based on the findings of this investigation, no further action is planned by R4 ERRB at this time. This removal and reconciliation of environmental issues was conducted without an Enforcement Instrument.

The OSC advised the RP that any outstanding issues or pending cases between State or Local agencies and Deep South Power will still need to be addressed or reconciled.

response.epa.gov/DeepSouthPower