

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Monday, May 11, 2009

From: Matthew Huyser

To: Shane Hitchcock, USEPA

Subject: Seven Out

901 Francis Street, Waycross, GA

Latitude: 31.2079196

Longitude: -82.3642648

POLREP No.:	7	Site #:	A4FY
Reporting Period:	3/25/2009 - 5/8/2009	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

On March 25, 2009, Winter Environmental remobilized to the Site - as scheduled on the most recent project schedule of March 9 - to setup for waste removal activities. Storm water that had collected in the secondary containment area was pumped into two 20,000-gallon frac tanks. Winter demobilized for the weekend on March 27 and remobilized on March 30 to begin waste removal.

Waste removal was conducted by pulling liquids and sludges with a vacuum truck through a 4000-gallon inline vacuum box. Non-hazardous waste from the tanks was sent to Republic Services Broadhurst Environmental Landfill in Screven, Georgia for solidification and disposal.

OSC Huyser arrived on-Site during the week of March 30 to conduct oversight of activities. After observing that dewatering of the secondary containment area had nearly filled both frac tanks, and a significant amount of rain was anticipated for the upcoming week, it was agreed that the intended plan of transporting rainwater to Jacksonville, Florida, in vacuum trucks would be insufficient for the volume of rainwater being collected. OSC Huyser and Winter Environmental contacted the City of Waycross to discuss the option of discharging rainwater to the sanitary sewer system. Scott Murphy, Project Manager with the city's Water and Sewer Department (and former employee at the BCX/Seven Out facility), visited the Site to observe operations, provide guidance on some aspects of the facility, and coordinate a plan for discharging rainwater to the sanitary sewer. The city issued a special discharge permit to Winter later that week. Under the arrangement, Winter would collect a representative sample of each frac tank after it was full and send it to a laboratory for metals analysis; if the results were sufficient, then water was pumped through a discharge point that was originally used by the Seven Out facility.

Before vacuum tanks were sent to the landfill, Winter was notified by Republic Services that several of the tanks had not been approved for disposal. Since waste in the vacuum boxes would have to be left on-Site throughout the weekend while additional data was reviewed by Republic Services, Winter inquired whether an employee remaining on-Site to provide security would sufficiently meet the requirements of section 4.2 of the Removal Action Work Plan (RAWP). OSC Huyser agreed that an employee remaining at the Site was sufficient, so Environmental Quality (a subcontractor to Winter) remained on-Site with the vacuum truck. On April 13, Republic Services notified Winter that the waste of concern was approved for disposal at the Broadhurst Landfill.

START visited the Site during the week of April 20 to provide oversight and make observations of all activities. In order to provide a more accurate estimate of overall piping length, START made several measurements and determined that there was approximately 6,850 feet of piping at the facility. One of Winter's estimates concluded that there was approximately 10,000 feet of piping and conduit. This

information will be necessary if decontamination of a piping is necessary, and if ownership of equipment grievances continue.

Also during the week of April 20, Winter was notified by Republic Services that a second set of tanks, none of which had yet been opened or pumped, would not be approved for disposal without new data with TCLP analysis. Winter completed removal activities for the week and scheduled a sampling event to begin April 27. EPA was notified on April 23 of the intention to begin sampling and a formal notification was sent in the biweekly progress report on April 24 with a special waiver request from the requirement in the consent agreement for 14-days notice on sampling events. OSC Huyser granted the waiver so that Winter could begin sampling immediately.

The additional samples were collected from 11 tanks on April 27 and 28. During the sampling and analysis period, tanks that had been approved for disposal were pumped, vacuum boxes were emptied at the landfill, then decontamination of tanks began and continued throughout the week of May 4. Analytical results arrived on May 5 and indicated that 10 tanks were non-hazardous and one tank (RW-2) was characteristically hazardous waste after TCLP analysis.

OSC Huyser visited the Site on May 5 and 6 to conduct oversight, observe decontamination activities, and discuss anticipated removal and handling methods of hazardous wastes.

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 (ONGOING);
- Decontamination and/or disposal of all tanks, drums, and other containers on the Site, as well as decontamination of the secondary containment area (ONGOING); and
- Disposal of the waste material removed from the Site, including any sampling and analysis necessary to determine proper treatment and disposal methods (ONGOING).

Next Steps

Waste removal activities will restart on May 11.

Key Issues

On May 5, OSC Huyser advised Winter on how various tanks at the Site could be sufficiently closed out to meet the requirements of the consent agreement and the RAWP:

- Open-top conical-bottom tanks can be sufficiently closed by removing piping before the first valve - preferably at the immediate bottom of the cone
- Open-top flat bottom tanks can be sufficiently closed by installing a cover over the tank with a lock, removing piping after the first valve, then closing the valves and locking them
- Enclosed tanks can be sufficiently closed by removing piping after the first valve, then closing the valves and locking them
- Holes can be cut in tanks as necessary to remove wastes, but holes should not be cut in the bottoms of tanks as a closeout method

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
RST/START	\$48,000.00	\$40,295.89	\$7,704.11	16.05%
Intramural Costs				
Total Site Costs	\$48,000.00	\$40,295.89	\$7,704.11	16.05%

* 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

Wastes disposed from the Site up to the date of this POLREP:

- 319.7 tons of nonhazardous liquid/sludge/solids from tanks sent to Republic Services Broadhurst Environmental Landfill in Screven, Georgia
- 160,000 gallons of rainwater from secondary containment area discharged to Waycross Waste Water Treatment Plant (operated by ESG Operations, Inc.) in Waycross, Georgia

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POLREP #7 Last Updated 6/12/2009