United States Environmental Protection Agency Region IV POLLUTION REPORT

Date: Thursday, May 14, 2009

From: Jennifer Wendel

Subject: On Going Removal Activities from 5/4/2009 to 5/8/2009

Ecusta Mill

1 Ecusta Road, Pisgah Forest, NC

Latitude: 35.2711000 Longitude: -82.7050000

POLREP No.: 22 Site #: A4AK

Reporting Period: 5/4/2009 to 5/8/2009 **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 EP-W-05-053 Contract #

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 subfloor, 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 electrochemical 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

DEMOLITION/ DEMO SUPPORT

DH Griffin continued removing utilities to 4 feet, Shaw is providing QC oversight.

DH Griffin continued demolition of buildings 62.

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

DH Griffin continued demolition of building slabs 11,15,30,37,57,62.

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

DRV continued discharging from the north clarifier into the ASB.

ENVIRONMENTAL

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

Shaw performed daily monitoring of building 89 soil stockpiles. The highest PID reading was 3.6 ppm for the week.

Shaw began/completed sampling east and south ditch samples form transects requiring additional data, 21 transect were samples and analyzed for mercury.

Shaw collected under slab samples from under buildings 20,62, all were below SRG's for XRF metals analysis.

Shaw sampled under bldg 62 (boiler house) 50k UST, 5 samples were collected and analyzed

Planned Removal Actions

DEMOLITION/ DEMO SUPPPORT

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, Shaw will continue QC oversight.

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/concrete.

ENVIRONMENTAL

Shaw will continue site wide sub slab analysis and utility investigation.

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.

Shaw will begin collecting soil borings for delineation and well installation around the impacted area around building 27.

Next Steps

Removing abandoned underground utilities

Testing the sludge in the green water. Shaw brought in 2 frac tanks to hold the green water until a pre-treatment system is on site.

Delineate the contamination around building 27 pit and install monitoring wells. Perform quarterly groundwater sampling once the wells are in place to establish a baseline.

Disposition of Wastes

DH Griffin shipped 64 loads of scrap metal weighing 1090 tons to DH Griffins Greensboro office for recycling.

DH Griffin continued shipping railroad ties to Republic Landfill, 9 loads weighing 150 tons was shipped.

DH Griffin continued shipping lead impacted brick and concrete to Republic Landfill, 17 loads weighing 281 tons were shipped.

DH Griffin shipped 1 loads of construction debris weighing 14 tons to WCA Landfill for disposal.

response.epa.gov/EcustaMillSite