

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

**Date:** Thursday, May 21, 2009

**From:** Randy Nattis

**Subject:** Railroad Street Drums  
17 Railroad Street, Haralson, GA  
Latitude: 33.2253000  
Longitude: -84.5703000

<b>POLREP No.:</b>	4	<b>Site #:</b>	A4YP
<b>Reporting Period:</b>		<b>D.O. #:</b>	0704-F4-0045
<b>Start Date:</b>	3/13/2009	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	3/13/2009	<b>Response Type:</b>	Emergency
<b>Demob Date:</b>		<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>		<b>Incident Category:</b>	Removal Action
<b>CERCLIS ID #:</b>		<b>Contract #</b>	EP-S4-0704
<b>RCRIS ID #:</b>			

#### Site Description

The Railroad Street Drum site is a former cotton mill situated to the northeast of the intersection of Main Street and Line Creek Road in Haralson, Coweta County, Georgia. According to the property owner, the cotton mill has been inactive for approximately 30 years. On February 6, 2009 representatives from the Georgia Environmental Protection Division (EPD) received an anonymous complaint concerning three above-ground storage tanks (ASTs) located adjacent to a storage building at 17 Railroad Street in Haralson, Georgia. According to the complainant, the ASTs appeared to be leaking and killing vegetation. The complainant also indicated that numerous drums were located in the area to the east of and across the railroad tracks from 17 Railroad Street.

A subsequent inspection conducted by EPD documented numerous containers at the site and indicated the presence of various pesticides, insecticides, and herbicides, as well as lead-acid batteries and drums reportedly containing used oil. Stressed vegetation was also documented in the vicinity of the ASTs. Based on the inspection and discussions with the property owner, EPD issued a notice of violation to the property owner, which required further characterization and disposal of materials at the site. However, further inspections by EPD representatives indicated no action was taken by the property owner and assistance from EPA Region 4 was requested

#### Current Activities

On March 13, 2009, EPA and Tetra Tech Superfund Technical Assessment and Response Team (START) mobilized to the Railroad Street Drum site and met with EPD and the property owner to conduct further assessment of site conditions. During the assessment personnel observed numerous drums and containers in various buildings at the site. While the majority of containers appeared to be empty, label information indicated that many formerly contained pesticides, including toxaphene, methyl parathion, 4,4-dichlorodiphenyldichloroethane (DDD), 4,4-dichlorodiphenyldichlorethylene (DDE), 4,4-dichlorodiphenyltrichloroethane (DDT), aldrin, alpha-BHC, captan, gamma-BHC (Lindane), and dieldrin.

Based on observations during response activities and available knowledge regarding chemicals formerly used at the site, EPA directed Tetra Tech START to collect six waste samples and four soil samples from the site. Analytical results for these samples are highlighted below:

- Waste samples WS-02 and WS-05 indicated the presence of pesticides at concentrations exceeding Region 4 Removal Action Levels (RAL), including 4,4-DDD, 4,4-DDE, 4,4-DDT, aldrin, alpha-BHC, gamma-BHC (Lindane), and dieldrin.
- Soil sample S-01, which was collected from the small drainage path that runs from the northeastern corner of Building 2 towards Building 1 indicated the presence of arsenic (up to 48 mg/kg) at concentrations exceeding the Removal Action Level (RAL).
- Soil samples S-02, which was collected from inside Building 2, and S-04, which was collected from inside Building 1, indicated the presence of pesticides at concentrations exceeding RALs, including toxaphene (up to 67,100 mg/kg), 4,4-DDT (up to 3,390 mg/kg), and alpha-BHC (up to 37.2 mg/kg).

All other sample results were below RALs. Based on these results, further characterization and delineation of contaminants should be conducted to determine extent of contamination.

On May 18, 2009, OSC Nattis and OSC Ball along with START personnel and EPA Science and Ecosystems Support Division (SESD) representatives mobilized to the site to conduct soil and groundwater sampling. OSC Nattis and START personnel collected the following soil samples.

- 3 surface (0-6 inches) soil samples at the 17 Railroad Street area in the vicinity of the 3 Above Ground Storage Tanks (ASTs).
- 3 surface (0-6 inches) soil samples and 1 subsurface (12-24 inches) soil sample in the area to the east and downgradient of Building 1.

The samples will be analyzed for Volatile Organic Compounds (VOCs), Semivolatile Organic Compounds (SVOCs), Chlorinated Pesticides, Target Analyte List (TAL) Metals, and Organophosphorus Pesticides.

OSC Ball and SESD collected groundwater samples from 4 residential wells at the following addresses:

- 91 Line Creek Road, Senioa, Georgia 30276
- 119 Line Creek Road, Senioa, Georgia 30276
- 148 Line Creek Road, Senioa, Georgia 30276
- 152 Line Creek Road, Senioa, Georgia 30276

The samples will be analyzed for VOCs, SVOCs, Chlorinated Pesticides, TAL Metals, Special Toxaphene using Method 8276 and Organophosphorus Pesticides.

On May 19 and 20, 2009 OSC Ball and START collected two air samples and one wipe sample inside the building located at 17 Railroad Street. The first air sample was collected to assess ambient conditions inside the building during an 8-hour period of time. The second air sample was collected to assess active conditions inside the building during an 8-hour period of time; active conditions were simulated using fans as well as the existing HVAC system to circulate air throughout the building for the duration of sampling.

The samples will be analyzed for VOCs, SVOCs, Chlorinated Pesticides, and TAL Metals.

#### **Planned Removal Actions**

EPA is currently negotiating with the PRP to conduct a voluntary removal of staged drums and containers. The PRP has obtained an environmental contractor and is preparing a disposal plan. Once analytical results are received from the sampling event, any soil or groundwater actions necessary will be included in negotiations.

[response.epa.gov/RailroadStreetDrums](https://response.epa.gov/RailroadStreetDrums)