

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

Date: Thursday, May 21, 2009
From: Jennifer Wendel

Subject: On Going Removal Activities from 05/11/2009 to 05/15/2009

Ecusta Mill
1 Ecusta Road, Pisgah Forest, NC
Latitude: 35.2711000
Longitude: -82.7050000

POLREP No.:	23	Site #:	A4AK
Reporting Period:	05/11/2009 to 05/15/2009	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	Contract #	EP-W-05-053
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 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

DEMOLITION/ DEMO SUPPORT

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

DH Griffin continued demolition of the trestle adjacent to building 62 and the two northern most buildings from 109.

DH Griffin continued removing concrete foundations and impacted soil around remaining two UST's at building 62, impacted soil staged in building 89.

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

DH Griffin continued demolition of building slabs 30,37,48,50,53,57.

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

DH Griffin moved arsenic soil from building 14 and staged in the coal yard for future placement.

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 10.7 ppm for the week.

Shaw began/completed delineating impacted soil using a geoprobe at building 27. A total of 37 borings were collected, monitoring wells were installed at 3 of these locations.

Shaw collected under slab samples from under buildings 30 and 37 all were below SRG's for XRF metals analysis.

Shaw used the geoprobe to collect groundwater pH at three areas surrounding building 15 to investigate groundwater pH. pH was normal @ 6.9-7.9

Shaw pumped the water from the south end of the green water pit to the frac tank, approximately 10,000 gallons pumped, 6-8" of sludge on vault bottom. Additional green water is also suspected in the inaccessible north end of the vault.

Shaw sampled sludge from the green vault pit, sludge press pile and the clarifier bottom.

Planned Removal Actions

DEMOLITION/ DEMO SUPPORT

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 will continue removal of the two remaining UST's at building 62.

DH Griffin will begin grading operations starting from the northeast end of the site moving south.

DH Griffin will pump water from buildings 11 and 15 to the grit chamber with regulator approval and backfill the basement.

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 sample the wells (3) installed in the area around building 27.

Shaw will collect confirmation wall samples from the UST excavation area at building 62.

Next Steps

Pumping water from the basement of Buildings 11 and 15 into the ASB via the east ditch. Shaw will monitor the pH of the east ditch throughout the process.

Pumping the water from the green water pit into an onsite frac tank and collect a sludge sample from the pit.

Remove USTs from Building 62. Once the tanks are removed, sample underneath and around the concrete pads and analyze for diesel range organics, gasoline range organics, volatile organics, and semivolatile organics.

Disposition of Wastes

DH Griffin shipped 48 loads of scrap metal weighing 782 tons to DH Griffins Greensboro office for recycling.

DH Griffin continued shipping railroad ties to Republic Landfill, 3 loads weighing 63 tons was shipped.

DH Griffin shipped 10 loads of construction debris weighing 144 tons to WCA Landfill for disposal.

response.epa.gov/EcustaMillSite