

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

**Date:** Friday, May 29, 2009  
**From:** Jennifer Wendel

**Subject:** On Going Removal Activities from 05/18/2009 to 05/22/2009

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

<b>POLREP No.:</b>	24	<b>Site #:</b>	A4AK
<b>Reporting Period:</b>	05/18/2009 to 05/22/2009	<b>D.O. #:</b>	
<b>Start Date:</b>	9/22/2008	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	9/22/2008	<b>Response Type:</b>	Time-Critical
<b>Demob Date:</b>		<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>		<b>Incident Category:</b>	Removal Action
<b>CERCLIS ID #:</b>	NCD003166675	<b>Contract #</b>	EP-W-05-053
<b>RCRIS ID #:</b>			

#### **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 & SUPPORT**

- DH Griffin continued removing utilities to 4 feet and Shaw provided QC oversight.
- DH Griffin completed removing concrete foundations and impacted soil around the remaining two UST's at boiler house (bldg 62). Approximately 1700 cu/yds of impacted soil was excavated and staged. The impacted soil was staged in warehouse building 89.
- DH Griffin continued crushing operations in the north and south ends of the site.
- DH Griffin continued demolition of building slabs 20, 43, 46, 48, 50, 57, and 88.
- DH Griffin completed demo of northern two storage sheds at 109.
- DH Griffin continued perimeter dust monitoring and no dust issues or exceedences were noted.
- DH Griffin pumped water from the basements of building 11 and 15 to the grit chamber.
- DRV monitored the pH of the east ditch during building 11/15 pumping activities, the highest reading was 10.5.
- 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 collected groundwater samples from the 3 new wells installed around the impacted soil around building 27.
- Shaw collected under slab samples from buildings 46, 48, 50, 109, 112 and all were below SRG's for XRF metals analysis.
- Shaw finished pumping the green water vault from the vault under building 59 into a frac tank. Approximately 17,000 gallons was pumped.
- Shaw re-analyzed the sludge from the sludge press stockpile and the green vault for TCLP metals. Previously they had been analyzed for total metals.
- Shaw collected samples from building 31 slab soil for laboratory analysis.

### **Planned Removal Actions**

#### **DEMOLITION & SUPPORT**

- Shaw and DH Griffin will continue the building clearance process.
- 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 and Shaw will continue QC oversight.
- DH Griffin and Shaw will continue slab removal and investigation process.
- DH Griffin will continue grading operations starting from the northeast end of the site moving south.

#### **ENVIRONMENTAL**

- Shaw will continue collecting samples for crushed debris.
- 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 delineate arsenic impacted soil at building 63.
- Shaw will collect confirmation wall samples from the UST excavation area at building 62.
- Shaw will collect Brown 31 leachate sample for RCRA metals analysis.

#### **Disposition of Wastes**

- DH Griffin shipped 95 loads of scrap metal weighing 1653 tons to DH Griffin's Greensboro office for recycling.
- DH Griffin shipped 4 loads of construction debris weighing 60 tons to the WCA Landfill for disposal.
- DH Griffin continued shipping railroad ties to the Republic Landfill. 3 loads weighing 63 tons were shipped.

[response.epa.gov/EcustaMillSite](http://response.epa.gov/EcustaMillSite)