

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Thursday, June 4, 2009

From: Jennifer Wendel

To: Christopher Masterson, EPA

Subject: On Going Removal Activities from 05/26/2009 to 05/29/2009

Ecusta Mill

1 Ecusta Road, Pisgah Forest, NC

Latitude: 35.2711000

Longitude: -82.7050000

POLREP No.:	25	Site #:	A4AK
Reporting Period:	5/26/2009 to 5/29/2009	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 & SUPPORT

- Shaw and DH Griffin performed building clearances for buildings 44 and 52.
- DH Griffin continued removing utilities to down to 4 feet below ground surface. Shaw provided QC oversight.
- DH Griffin continued crushing operations in the north and south ends of the site.
- DH Griffin began demolition of buildings 44 and 52.
- DH Griffin continued demolition of building slabs 43,46,48,50,57.
- DH Griffin continued perimeter dust monitoring. No dust issues or exceedences were noted.
- DH Griffin continued grading operations in the northeast corner of the site and the filter plant area.
- 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 volatiles monitoring of soil stockpiles in building 89.
- Shaw collected a leachate sample from brown # for RCRA TCLP and total metals analysis.

Planned Removal Actions

DEMOLITION & SUPPPORT

- DH Griffin will take down the black liquor tank 61.
- Shaw and DH Griffin will continue the building clearance process.
- DH Griffin demolition activities will continue for cleared buildings.
- DH Griffin will continue loading out scrap, C&D debris and non-hazardous materials.
- DH Griffin will continue removing utilities down to 4 ft below ground level. Shaw will continue QC oversight.
- DH Griffin/Shaw will continue slab removal and investigation process.
- DH Griffin will continue grading operations starting from the northeast end of the site moving south. Grading operations will include arsenic soil from the cellophane area.

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.
- Shaw will excavate arsenic impacted soil at building 63, stage the material in 89, and collect XRF confirmation samples.

- Shaw will excavate arsenic impacted soil at the cellophane area and transfer to the coal yard. Confirmation samples will be collected and analyzed on site with an XRF and a percentage to an off-site lab.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
RST/START	\$70,000.00	\$38,362.00	\$31,638.00	45.20%
Intramural Costs				
Total Site Costs	\$70,000.00	\$38,362.00	\$31,638.00	45.20%

* 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

- DH Griffin shipped 62 loads of scrap metal weighing 960 tons to the DH Griffins Greensboro office for recycling.

response.epa.gov/EcustaMillSite

POLREP #25 Last Updated 6/4/2009