

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

Date: Friday, June 12, 2009

From: Jennifer Wendel

Subject: On Going Removal Activities from 06/01/2009 to 06/05/2009

Ecusta Mill

1 Ecusta Road, Pisgah Forest, NC

Latitude: 35.2711000

Longitude: -82.7050000

POLREP No.:	26	Site #:	A4AK
Reporting Period:	06/01/2009 to 06/05/2009	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 clearance for the shed near the east ditch riser pipe.
- DH Griffin continued removing utilities to 4 feet below ground surface. Shaw continued providing QC oversight.
- DH Griffin continued crushing operations in the north and south ends of the site.
- DH Griffin continued demolition of buildings 44 and 52 and dropped black liquor tower 61.
- DH Griffin continued demolition of building slabs 46,48,50,53,57.
- 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. Kessel Engineering is monitoring fill placement and compaction.
- DH Griffin began grading arsenic soil in the coal yard received from the cellophane area.
- DH Griffin began excavating the east drainage swale on the east side of the site along the paved roadway.
- DRV continued discharging from the north clarifier into the ASB.

ENVIRONMENTAL

- Shaw collected samples from crushed material for lead analysis. Analytical results are all below regulatory guidelines.
- Shaw performed daily monitoring of building 89 soil stockpiles.
- Shaw excavated and staged clinkers soil from building 63, walls and floor confirmed clean with XRF analysis.
- Shaw excavated 6" of soil from the footprint of building 31 and re-sampled for PAH analysis. Previous analytical for floor samples failed for PAH's.
- Shaw began removing arsenic soils from the cellophane area and transporting to the coal yard. Confirmation samples were collected and confirmed clean using on site XRF analysis in buildings 93 and 98.

Planned Removal Actions

DEMOLITION & SUPPPORT

- Shaw and DH Griffin will continue the building clearance process.
- Shaw will continue collecting samples of 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 and 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 grading arsenic soil from the cellophane area in the coal yard.

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 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.

Disposition of Wastes

- DH Griffin shipped 63 loads of scrap metal weighing 898 tons to DH Griffins Greensboro office for recycling.

response.epa.gov/EcustaMillSite