

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Thursday, June 18, 2009

From: Jennifer Wendel

Subject: On Going Removal Activities from 6/8/2009 to 6/12/2009

Ecusta Mill

1 Ecusta Road, Pisgah Forest, NC

Latitude: 35.2711000

Longitude: -82.7050000

POLREP No.:	27	Site #:	A4AK
Reporting Period:	6/8/2009 to 6/12/2009	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 SUPPPORT

- DH Griffin continued removing utilities to 4 feet, Shaw is providing QC oversight.
- DH Griffin continued crushing operations in the north and south ends of the site.
- DH Griffin continued demolition of building 52 and dropped water tower 10.
- DH Griffin continued demolition of building slabs 31,46,48,50,53,98.
- 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.
- DRV continued discharging from the north clarifier into the ASB.

2.0 ENVIRONMENTAL

- Shaw collected samples from crushed material for lead analysis. Analytical results are all below regulatory guidelines.
- Shaw performed PID monitoring of building 89 soil stockpiles .
- Shaw performed a geotechnical stability investigation at brown #1, laboratory results are pending.
- Shaw excavated a lead hotspot from building 96 in the cellophane area. Approximately 175 cu/yds was excavated and staged in building 89 with approval from TCRA request #13.
- Shaw/ Galloway Construction continued 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.

Planned Removal Actions

DEMOLITION/ DEMO SUPPPORT

- 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 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 the portion of the east process sewer line between the loading dock at building 46 and the north end of the east trench.
- Shaw will be performing a site wide ground water monitoring event for metals, semivolatiles and volatiles.

Next Steps

- Shaw sent out the updated well locations for the site with the proposed groundwater constituents to be sampled. Shaw is looking to begin the site-wide baseline groundwater sampling on Monday.
- The caustic area RAP is being reviewed by Mike. Additional water samples are going to the treatability lab.
- Formal Shaw schedule to be out by end of day Friday. Generally, Shaw is looking to start the U-trenches on the east side the week of June 22nd, move into the building 58 trenches and go out the south side to the process sewer lines. The ditches would be last probably in the late August early September time frame.
- Water treatment system will start arriving June 17th.
- Brown #1 investigation is next week.

Disposition of Wastes

- DH Griffin shipped 87 loads of scrap metal weighing 1515 tons to DH Griffins Greensboro office for recycling.

response.epa.gov/EcustaMillSite