

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Thursday, July 23, 2009

From: Diedre Lloyd

Subject: Initial and Final Polrep
Former WAMA Manufacturing
2805 Sweetwater Street, Austell, GA
Latitude: 33.8147000
Longitude: -84.6356000

POLREP No.:	1	Site #:	A4ZT
Reporting Period:	6/23/09 to 8/14/09	D.O. #:	
Start Date:	6/23/2009	Response Authority:	CERCLA
Mob Date:	6/23/2009	Response Type:	Emergency
Demob Date:	7/8/2009	NPL Status:	Non NPL
Completion Date:	7/8/2009	Incident Category:	Removal Action
CERCLIS ID #:	GAN000410423	Contract #	EP-S4-0704
RCRIS ID #:			

Site Description

From March 14, 2008 to present, Georgia Department of Natural Resources, Environmental Protection Division (EPD) tried without success to compel the previous leasee, WAMA Manufacturing and the present site owner, to properly characterize and dispose of 5 abandoned drums onsite. On June 23, 2009, the Emergency Response and Removal Bureau (ERRB) received a request from GA EPD to address the proper disposal and characterization of the abandoned drums due to a lack of funding at the state level.

The "Former WAMA Manufacturing" site is currently an abandoned warehouse located in Austell, Georgia and was previously used by the former leasee, WAMA Manufacturing, to manufacture polyurethane skateboard wheels. Two of the five drums are nearly or completely empty with the remaining three drums ranging from completely full to less than one third full. The tops of two of the five drums are bulging or the metal bent, although none of the drums is currently leaking or breached. There is a threat of leakage to the surrounding environment due to the bulging/bent metal tops and due to the present storage conditions of the drums atop a steep incline with the drums only support provide by small fledgling trees growing downslope and behind the drums. Debris is also on top of and surrounding the drums. The drums are suspected to contain the hazardous substance isocyanate, and one or both of the following constituents that are used to manufacture polyurethane: 1) polyol and/or 2) diisocyanate.

Planned Removal Actions

Planned Emergency Response Actions:

An initial site evaluation was conducted on June 23, 2009 to determine if an emergency action was warranted by EPA ERRB to remove or minimize potential threats to human health and/or the environment.

§300.415(b)(2)(i). "Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants."

The drums on the site are located in an unsecured location and may pose a potential threat to nearby buildings, tenants, trespassers and any nearby populations. There is also a nearby restaurant within the warehouse/business complex. All the aforementioned groups may be potentially exposed to hazardous substances if any drums are moved and/or opened. Additionally, the present storage conditions of the drums pose a potential problem because they are situated atop a steep incline with the drums only support provided by small fledgling trees growing downslope and behind the drums. The drums could easily turn over and release potentially hazardous substances downslope where a business is located, potentially exposing nearby businesses, residents, as well as responders, to hazardous substances.

Isocyanate and one or both of the following constituents are used to manufacture polyurethane: 1) polyol and/or 2) diisocyanate and are hazardous substances as defined by §101 (14) of the Comprehensive Environmental, Response, and Compensation and Liability Act (CERCLA) definition. The contaminants mentioned above pose a threat to the human population with the possibility of exposure within the

community. Site conditions meet the requirements for initiating a time-critical removal action according to criteria listed in §300.415(b)(2) of the National Contingency Plan (NCP).

§300.415(b)(2)(iii). “Hazardous Substances or pollutants or contaminants in drums, barrel, tanks, or other bulk storage containers, that may pose a threat of release.”

The facility is not operational and the drums are located on the side of the warehouse building in an unsecured area. Two of the five drums are nearly or completely empty with the remaining three drums ranging from completely full to less than one third full. The tops of two of the five drums are bulging or the metal bent, although none of the drums is currently leaking or breached. There is a threat of leakage to the surrounding environment due to the bulging/bent metal tops and due to the present storage conditions of the drums atop a steep incline with the drums only support provide by small fledgling trees growing downslope and behind the drums.

§300.415(b)(2)(vii). “The availability of other appropriate Federal or State response mechanisms to respond to the release.”

At this time there exist no additional State mechanisms that are able to respond to this incident in the required manner. EPA initially assumed cleanup activities at the Site through a State referral.

300.415(b)(2)(v) “Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released”

Potential releases from the drums may contaminate the surface areas on-site and any storm water runoff could discharge off-site thereby contaminating adjacent properties along with Sweetwater Creek, a nearby waterbody.

REMOVAL ACTIVITIES

Removal activities for the Site include the following:

- Secure the site to prevent exposure to the environment and nearby populations;
- Initial characterization, segregation and staging of all drums;
- Over pack or close leaking drums, or vats where feasible, to prevent releases or offsite migration;
- Sampling of waste to determine the specific nature of material;
- Disposal of wastes, materials, contaminated soils, sediments, other debris
- Transportation and offsite disposal of waste materials generated by this and subsequent removal actions in compliance with Federal regulations including the CERCLA off site rule.

Due to the nature of the emergency along with a lack of response by the responsible parties and a lack of state resources, EPA ERRB initiated an emergency action to prevent and/or mitigate any contamination migration to nearby populations and surrounding areas. The drums were removed from the site on July 8, 2009 and the drums and their contents were sent to an EPA approved disposal facility for proper disposal.

response.epa.gov/wamamanufacturing