

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
National Petroleum Packers - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #2
RSE POLREP #2
National Petroleum Packers
A4QL
Stallings, NC
Latitude: 35.0847089 Longitude: -80.6782999

To:
From: Jeffery Crowley, OSC
Date: 4/5/2010
Reporting Period: 3/19/2010

1. Introduction

1.1 Background

Site Number:	A4QL	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Assessment
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:		Start Date:	
Demob Date:		Completion Date:	
CERCLIS ID:	NCD986232213	RCRIS ID:	
ERNS No.:		State Notification:	3/12/2010
FPN#:		Reimbursable Account #:	

The National Petroleum Packers (NPP) Site was originally referred to EPA in March 2007 and a subsequent Removal Site Evaluation was completed in June, July, and August of 2007. Detailed information on the Site history, background information, and threats posed can be found in Pollution Report #1 dated 11/26/2007.

In that POLREP, EPA decided to allow the PRP to attempt the cleanup on his own with EPA and the State checking the progress. However, the PRP did not follow through with his promises and North Carolina Department of Environment and Natural Resources (DENR) asked EPA Region 4 Emergency Response and Removal Branch (ERRB) on March 12, 2010 to reassess the Site. This Removal Site Evaluation (RSE) POLREP details new findings and documents present Site conditions.

1.1.1 Incident Category

Inactive Waste Management Facility.

1.1.2 Site Description

For Site Description, location, description of threat please refer to POLREP #1.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On March 19, 2010 ERRB and DENR conducted a site visit to check current site conditions and determine if they still require a removal action. The Site is very large and some areas are overgrown with weeds. Access to the property is blocked by a gate but could easily be bypassed through holes under or around the fence. The warehouse that contains the lab and the bulk of the drums on the site was secure and access could not be gained on this trip.

The OSC looked through a hole in one of the doors and noticed many drums stacked in the building, even noticing labels on the drums of "oxidizer" and "caustic".

The Site had dozens of drums, mostly full, scattered throughout the property. Some were surrounded by what appeared to be an oily stain and some were leaking onto the ground. Several of the drums containing materials were leaking, even cracked. In addition, most of the drums are either mislabeled or not labelled at all. There also was an area of the site that housed the glycol processing unit. It too was surrounded by drums and the pad upon which it sat was heavily stained with oil and grease. Also scattered throughout the site were several tanker trailers that were also not labeled.

There were also several above ground storage tanks (ASTs) throughout the site. Most were located in secondary containment, but there were a few that weren't. Without exception, the ASTs were all rusting and several had cracks and physical damage. One area of the Site, just north of the warehouse housed many ASTs that showed they were full (by reading the gauges). There was a valve in this area that had a steady drip of a green liquid that had similarities to antifreeze. The walls of this containment area were heavily damaged (it appears something ran into the wall, see pictures).

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

As stated earlier, the Site had a previous Removal Site Evaluation conducted by EPA in June, July, and August of 2007. Detailed information on that RSE can be found in POLREP #1 and in the Final RSE submitted 11/21/2007. However, a review of that data concludes that the threats posed still remain.

After a review of the data generated from the previous site evaluation and the current site condition, ERRB has concluded that the site meets the criteria as set forth in 40 CFR 300.415 (b)(2) for a time critical removal action.

2.1.2 Response Actions to Date

There have been no response actions taken by EPA or the State to date.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

PRPs have been identified and letters notifying them of potential liability under Section 107(a) of CERCLA are being prepared.

2.2 Planning Section

Hazardous materials present in on-site surface and subsurface soils pose the following threats to public health or welfare as listed in Section 300.415 (b)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP):

Section 300.415 (b)(2)(i) Actual or potential exposure to nearby human populations, or the food chain from hazardous substances pollutants or contaminants;

EPA sampling revealed that there are hazardous substances (ethylene glycol, phenols, benzenes, naphthalenes) present on site. Current site conditions would easily allow a person to access the property and come into contact with these hazardous substances.

Section 300.415(b)(2)(ii) Actual or potential contamination of drinking water supplies or sensitive ecosystems;

Analysis of the containment surrounding drums and other storage containers has deemed it inappropriate to contain a release. Drainage leads off the Site and into South Fork Crooked Creek. Should there be a release of materials from the Site, it is possible for the materials to enter the creek ecosystem.

Section 300.415(b)(2)(iii) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;

During the initial RSE conducted by EPA, 500 55-gallon drums, 27 ASTs, three 300-gallon totes, and several tanker trailers were inventoried at the Site. Many of these containers based on Site conditions observed on March 19, 2010, are in poor condition and inadequate for storing hazardous substances. The condition of the containers (mainly the ASTs) are a concern for a release.

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

Areas of the site are already flooded with accumulated rainwater and there is also a large amount of surface staining from oils and other dry chemicals. Weather conditions such as rain could cause these materials to migrate off-site. Other weather conditions such as high wind or hail will continue to damage the bulk storage containers on site and could cause a release.

Section 300.415 (b)(2)(vii) The availability of other appropriate federal or state response mechanisms to respond to the release;

DENR has asked for EPA assistance with this Site.

Due to the threat and/or future threat to human health from the hazardous substance, the Site achieves removal eligibility based on the removal criteria listed above.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.