

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #3
Initiation of Time-Critical Removal Action
National Petroleum Packers
A4QL
Stallings, NC
Latitude: 35.0847089 Longitude: -80.6782999

To:
From: Jeffery Crowley, OSC
Date: 10/8/2010
Reporting Period: 9/29/10 - 10/8/10

1. Introduction

1.1 Background

Site Number:	A4QL	Contract Number:	EP-S4-07-04
D.O. Number:	105	Action Memo Date:	9/14/2010
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	9/29/2010	Start Date:	9/29/2010
Demob Date:		Completion Date:	
CERCLIS ID:	NCD986232213	RCRIS ID:	
ERNS No.:		State Notification:	03/12/2010
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Inactive Waste Management Facility.

1.1.2 Site Description

For Site Description, location, and description of threat please refer to previous POLREPs.

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 labeled 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 concluded that the site met the criteria as set forth in 40 CFR 300.415 (b)(2) for a time critical removal action. An Action Memorandum was signed on September 10, 2010 to initiate a time-critical removal action at the Site.

Prior to work beginning onsite, a quick inventory concluded that there are currently 20 ASTs, 3 semi-tractor trailers, approximately 275 55-gallons drums, a laboratory with chemicals, a supporting laboratory closest, and numerous containers less than 55-gallons in size.

2.1.2 Response Actions to Date

The following actions occurred during this reporting period:

Site activities began on September 29, 2010 when the OSC, ERRS, and START met on-site to conduct a site walkthrough to gather logistical information for the ramp-up of work.

Beginning on October 4, 2010, EPA OSC ERRS, and START began to sample and characterize the containers on site. As of the date of this report, 203 drums, and three ASTs have been sampled and characterized by on site hazcating. The field test have shown one drum that is classified as ignitable, 43 drums that are categorized as containing chlorides, 15 drums that contain an acid solution, 53 drums that contain a base material, and 89 drums considered to be non-hazardous. Following the test, the drums are being segregated and stored with like materials for future disposal. Several of the drums were in poor condition and needed to be over-packed to prevent releases. Level C PPE has been donned during the opening of the drums with real-time air monitoring. To date there have been no levels of contaminants for in air monitoring to justify upgrading to Level B.

Additionally, ERRS has been clearing debris from the Site and conducting site preparation activities in preparation for future on-site work. This included brining in a rolloff box for trash and another for containerizing scrap metal and other recyclables.

During this reporting period the Site was also visited by the Mayor of Stallings, NC and the Chiefs of two local fire departments.

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

A PRP was identified and letters notifying potential liability under Section 107(a) of CERCLA were prepared and sent. The PRP was not able to provide financial assurance to complete the necessary actions at the Site.

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

During the next reporting period it is anticipated that the remainder of the ASTs on site will be sampled and characterized and that work will begin on the sampling and characterization of all of the smaller than 55 gallon containers on-site. ERRS will continue to clean the site and bulk like materials for future disposal.

2.2.1.2 Next Steps

Beyond the next reporting period, characterization will continue to take place on smaller containers and other materials on site (including sludges and other standing water). Additionally, the materials in the ASTs will be fully characterized and the amount of solids in each tank will be verified.

2.2.2 Issues

A process will need to be developed to handle the materials in the ASTs. Many of them contain a mixture of liquids and solids. This poses an issue to being able to pump the materials out of the containers.

2.3 Logistics Section

At this time, this Site poses no logistical issues. As operations move from the characterization to the disposal and treatment phase it is anticipated that more personnel and equipment will be needed.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

2.6 Liaison Officer

The OSC has contacted the Mayor of Stallings, NC to notify her of the onsite activities.

2.7 Information Officer

The OSC was contacted by a local newspaper but no interviews were conducted during this reporting period.

3. Participating Entities

No information available at this time.

4. Personnel On Site

- 1 - EPA OSC
- 2 - START (Otie)
- 5 - ERRS (ER)
- 1 - EPA Other (CDC)

5. Definition of Terms

AST - Above Ground Storage Tank
EPA - Environmental Protection Agency
ERRB - Emergency Response and Removal Branch
ERRS - Emergency and Rapid Response Services
NPP - National Petroleum Packers
OSC - On Scene Coordinator
PPE - Personal Protective Equipment
PRP - Potentially Responsible Party
START - Superfund Technical Assessment and Response Team

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.