

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #5
National Petroleum Packers
A4QL
Stallings, NC
Latitude: 35.0847089 Longitude: -80.6782999

To:
From: Jeffery Crowley, OSC
Date: 11/1/2010
Reporting Period: 10/18/2010 - 10/29/2010

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

For detailed information on the Preliminary Removal Assessment and Site Inspection please refer to the Removal Site Evaluation POLREP (POLREP #2) and the the RSE Site Evaluation Report (2007).

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 Report 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.

2.1.2 Response Actions to Date

During this reporting period START continued to hazcat unknown materials, while ERRS continued to overpack 55-gallon drums and continued to consolidate the materials in each waste stream. An EPA-EPM and EPA-CI were also on-site reviewing historical files and office paper work.

To date, 302 55-gallon containers, 175 small containers, 29 ASTs, and 6 miscellaneous items, have been sampled and categorized by onsite hazcat testing. The 55-gallon drums and small containers have been consolidated into 281 55-gallon containers and/or 85-gallon overpacks. The 281 drums

are currently subdivided into 5 waste streams: 149 non-haz, 66 bases, 47 chlorides, 17 acids, and 2 flammables waste drums. In addition, 374 items in the chemical laboratory closet have been cataloged.

ERRS worked on reconditioning the base valves of each onsite AST. Rusted and closed valves were and reopened and where necessary, piping was added/adapted to accommodate for the pumping of the tank contents when needed.

In preparation for disposal, companies were contacted as part of the RFQ for the material inside ASTs 1, 2, and 3. All companies requested a composite sample of the material in the tanks. On October 26 the three tanks were sampled (bitters- not bottoms) and an aliquot of the composite sample were sent to each bidder that requested samples. On October 27 all the bidders reported that the material had no glycol products. Upon request, on October 27, a second composite sample from each of the three tanks (bottom – heavier constituents below bitters) was sent to two of the initial bidders that requested samples. The second sample was taken from the lowest part of the tank. The bidders felt that if there were glycol compounds in the tank that they would be found at the bottom of the tank due to glycol having a higher specific gravity than water. On October 28, it was reported that no glycol compounds were in the samples taken from the bottom of the tank either. These results have led the bidders to request a BTU test on the materials.

The results for the asbestos sampling event arrived on October 25, 2010. All materials tested resulted in non-detect for chrysotile, amosite, crocidolite, actinolite, tremolite, or anthophyllite. No asbestos was found around the glycol recycler. There was no other evidence of asbestos containing material onsite.

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

As stated earlier, a EPM and CI were onsite during this reporting period to look through office materials and other documents.

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 process of pumping out the materials located in ASTs 1,2 and 3 will begin. It is also anticipated that the transport and disposal of drums will begin. START plans to have all of the chemicals located in the chemical storage closet and lab inventoried for future lab-packing.

2.2.1.2 Next Steps

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

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

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

5. Definition of Terms

AST - Above Ground Storage Tank
BTU - British Thermal Unit

CI - Civil Investigator
EPA - Environmental Protection Agency
EPM - Enforcement Project Manager
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
RFQ - Request For Quote
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.