

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
East Ellijay Orphaned Drum - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #2
Stabilization and temporary demobilization
East Ellijay Orphaned Drum
B4D9
East Ellijay, GA
Latitude: 34.6757292 Longitude: -84.4744027

To: Shane Hitchcock, USEPA R4 ERRB
Matt Taylor, USEPA R4 ERRB

From: Matthew Huyser, On Scene Coordinator

Date: 11/26/2010

Reporting Period: 11/25/2010

1. Introduction

1.1 Background

Site Number:	B4D9	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	11/25/2010	Start Date:	11/25/2010
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Emergency

1.1.2 Site Description

On 11/24/2010, GAEPD was notified of 27 orphaned drums at an abandoned construction site in East Ellijay, GA. East Ellijay PD believes that the drums were recently dumped at the site illegally and is investigating who accessed the site and when. The drums were reportedly disorganized, in an unstable condition, many were rusted and/or dented, and some were reported leaking. Also, several responders noted a "chemical" odor in the vicinity.

1.1.2.1 Location

The drums were dumped at the rear of an abandoned construction site off Maddox Drive in East Ellijay, Georgia. The site is a flat surface cut into a hillside and there are several open stormwater drains nearby.

1.1.2.2 Description of Threat

The drums contain unknown, potentially hazardous, materials; some of the liquids which appear to be used oil have leaked and many of the drums are in unstable condition which require over-packing. Any labels that were found on the drums have been worn and may be outdated, so their true contents is uncertain despite the existence of any labels at all. A trend of labels suggests that many of the drums may contain outdated roofing installation products, many of which are flammable and some of which are reactive.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

GAEPD requested EPA assistance in responding to the release. EPA Telephone Duty Officer OSC Garrard dispatched R2 OSC Huyser to respond; EPA mobilized START contractor, TTEMI, and ERRS contractor, ER. Initial efforts will consist of assessing the immediate hazard posed by the drums and stabilizing site conditions.

OSC Huyser met with Gilmer County FD at the site and conducted an initial perimeter survey with air monitoring equipment. No adverse air quality issues were found and no odors were observed as had been previously reported (however, wind speed was approximately 3-8 mph and FD responders reported that the odors had been observed when there was no wind). A total of 27 drums were counted, most of which were laying on their side. Also, a series of truck tracks was observed leading to and from the location of the drums that had been made by a large vehicle; Gilmer County FD reported that these tracks had not been

made by the FD or the PD, and it was believed that the Georgia Power employees who discovered the drums had entered from the opposite end of the property.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

OSC Huyser arrived at approximately 0020hrs on 11/25/2010 and met with Gilmer County FD to collect background information and survey the site; START arrived shortly thereafter at 0130hrs. OSC Huyser and START approached the drums with air monitoring equipment and made several close observations of drum condition, contents, and spilled materials. No adverse or elevated air readings were recorded and it was determined that the drums could be moved in Level D PPE with splash protection. Several of the drums had worn but legible labels; the labels appeared to consistently indicate that the drums were similarly related roofing products such as adhesives and foam sealant. However, none of the drums were opened, so it has not yet been verified whether the labels are indicative of the true contents. Most of the drums were standard steel 55 gallon, at least three drums were white polycarbonate (or other similar plastic), and one drum was a straight-sided 38 gallon container.

Gilmer County FD remained at the site with two utility trucks to provide a lighting source for response operations. ERRS crews arrived on-scene at approximately 0230hrs on 11/25/2010 and began uprighting and overpacking drums at approximately 0330hrs. A skidsteer with drum grapple was used to load drums onto a stakebed truck. All ERRS traffic was diverted around the western and northern perimeter of the construction site to preserve the truck tracks at the east perimeter of the site which may have been left by the person(s) who dumped the drums. The drums were taken on the stakebed truck to the county vehicle repossession lot where the drums were staged and secured on plastic sheeting for temporary storage. The repossession lot is owned and operated by the county, and is secured by a perimeter fence with a locked gate. Several small areas where material had spilled were excavated with shovels and the soil is stored in an empty drum. OSC Huyser conducted a final inspection of the site to ensure that no materials had been left behind, and crews demobilized by approximately 0800hrs.

2.1.2 Response Actions to Date

START conducted air monitoring around and at the drums, finding no adverse air quality issues when the drums were closed. EPA conducted a field screening test for PCBs in liquid from a puddle of spilled material that appeared to be oil; the field test result was negative for presence of PCBs. ERRS crews overpacked a total of 7 drums, and staged a total of 27 drums. The drums were moved from the site approximately 1 mile south to the county auto repossession lot in two separate trips with a stakebed truck. The drums were staged at the northwest end of the lot on a single plastic sheet and covered with another end of the sheet; the sheet was secured with heavy objects. The lot is surrounded by an 8-foot perimeter fence and locked with a padlock (the lot can be accessed during regular business hours by approaching the main building, or after business hours by contacting the Gilmer county dispatch office).

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

No PRPs have been identified. City and Ellijay Police Department are currently investigating the illegal dumping of the drums.

2.1.4 Progress Metrics

(Waste streams have not yet been identified)

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

EPA and START will return to the staging area during the week of November 29 to sample each of the drums for hazcatting and waste disposal profiling. ERRS will arrange for waste disposal of the drums after sample results have been returned.

2.2.1.1 Planned Response Activities

- 1) Conduct air monitoring to ensure health and safety of the public and site workers; (COMPLETE)
- 2) Contain and remove free liquids, sludges and contaminated soils in areas which pose a threat of release to the environment and/or pose a threat of exposure to human and environmental receptors; (COMPLETE)
- 3) Pump, overpack, stabilize, or otherwise secure containers found on-site to prevent further release of materials; (COMPLETE)
- 4) Excavate contaminated soil from on-site and along run off pathway; (COMPLETE)
- 5) Provide temporary storage of wastewaters, sludges, contaminated soils, containers and wastes generated during removal and decontamination activities, pending further waste characterization and profiling for disposal/treatment/reuse/recycling; (COMPLETE)
- 6) Collect samples of wastes generated during removal activities. This activity may include hazard categorization or procurement of laboratory analytical services to facilitate

disposal/treatment/reuse/recycling; and,

7) Arrange for off-site transportation disposal/treatment /recycling/reuse of hazardous substances and oil.

2.2.1.2 Next Steps

See Anticipated Activities, section 2.2.1.2

2.2.2 Issues

none of the drums were opened, so it has not yet been verified whether the labels are indicative of the true contents. While it is likely that the contents are waste roofing chemicals, it is possible that the drums were taken from a business that utilizes the roofing products but were then filled with unrelated waste substances.

2.3 Logistics Section

N/A

2.4 Finance Section

2.4.1 Narrative

The total site ceiling in the Emergency Action memorandum is \$250,000; the current TO ceiling for ERRS is \$75,000 and the current TDD ceiling for START is \$10,000.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$75,000.00	\$0.00	\$75,000.00	100.00%
TAT/START	\$10,000.00	\$0.00	\$10,000.00	100.00%
Intramural Costs				
Total Site Costs	\$85,000.00	\$0.00	\$85,000.00	100.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

N/A

2.6 Liaison Officer

N/A

2.7 Information Officer

2.7.1 Public Information Officer

N/A

2.7.2 Community Involvement Coordinator

N/A

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

GA EPD

Gilmer County Fire Department

4. Personnel On Site

EPA OSC Huyser

START TTEMI (2)

ERRS ER (5)

Gilmer County FD (3)

East Ellijay PD (1)

5. Definition of Terms

N/A

6. Additional sources of information

6.1 Internet location of additional information/report

N/A

6.2 Reporting Schedule

N/A

7. Situational Reference Materials

N/A

POLREP #2 Last Updated 1/31/2011