U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
National Fireworks Operable Unit 2 - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #3**
Excavation of Anomaly B1: Pin Flares
National Fireworks Operable Unit 2
A4EQ
Cordova, TN
Latitude: 35.1620360 Longitude: -89.7460040

To:
From: Keriema Newman, RPM
Date: 12/15/2010
Reporting Period: 12/6/2010 - 12/10/2010

1. Introduction

1.1 Background

Site Number:	A4EQ	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	6/7/2010
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	PRP	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	2
Mobilization Date:	12/7/2010	**Start Date:**	
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

Site Description

See POLREP #1 for site description and background information.

Current Activities

RPM traveled to site the week of December 6, 2010 to oversee the excavation and removal of buried pin flares in Anomaly B1. Monday was a mobilization day and field preparation day for ENSAFE and their subcontractor USA Environmental. USA Environmental was onsite to perform the excavation of the pin flares and packaging of the pin flares for shipping and disposal. The excavation began on Tuesday morning. USA Environmental dug through the suspected area using a flat blade bucket backhoe. At approximately 2' depth into the excavation, they encountered pin flares. The contractor began to sort through and remove the pin flares by hand. The flares were put in 5 gallon buckets as they were removed from the soil piles. Visual observation of the flares indicated that there were enough flares to fill 3-4 (5)-gallon buckets.

The contractor encountered a mass of pin flares that were in a a tight / wet silty clay soil matrix as they continued to dig deeper into the pit. The pin flares were difficult to remove from the soil matrix by hand. It was decided that the excavation should continue. The smaller piles were staged outside of the excavation. The piles were later moved to a nearby concrete slab (west of the pit) and allowed to dry. Weather conditions were not dry and sunny. It was cold, windy and cloudy.

The planned response action involved packaging the pin flares in bandolers (plastic casing that held 6 pin flares) prior to shipping the pin flares in ammo cans to the Clean Harbors Facility in Colfax, LA. The volume of pin flares encountered were more than the PRP and their contractors anticipated. The pin flares are no longer manufactured by the PRP. Therefore, there were only a set amount of bandolers available to ship them in. The EX shipping number issued by the Department of Transportation (DOT) for the pin flares required bandolers. Therefore, in order to ship the mass of pin flares either a variance from DOT would be required or a new EX number would need to be issued by DOT. Based on the field conditions, it was decided to continue to physically remove as many pin flares as possible by hand from the different piles. Also, a mechanical device to remove the pinflares is necessary to efficiently remove the pin flares from the clay matrix. It was decided that the pin flares would not be shipped off due to the volume of pin flares and the difficulty in removing the remaining pin flares from the clay.

The pin flares that were removed from the soil were placed into 3 static lined drums along with the other piles of soil back into the excavation. The piles that were staged on the concrete slab as well as the piles outside of the excavation were place back into the excavation.

It was decided that the PRP would need to explore an alternative to shipping the pin flares using the bandolers. The PRP and their consultant would investigate treating the pin flares onsite, the availability of a contractor to perform the treatment, a new EX number or variance from DOT, and a mechanical device onsite to sift or remove the pin flares from the clay matrix. Personnel present from ENSAFE conducting the field work included Allison Harris and Jason Broughton. Personnel onsite from Security Signal (PRP) included the owner Susan Lee and and Health & Safety Manager Phil Coop.

Revisions to the workplan may be necessary based on further decisions on how to deal with the pin flares. The PRP along with their contractor and EPA will decide the next course of action in order to move forward.

The removal of the metal shop waste was scheduled for the week of December 13th. As a result of the pre-excavation sampling performed the week of November 8th, the volume of soil increased. The original size of the excavation (20x20x6 feet deep) increased to 43x31x11 feet deep. Therefore, the overall volume increased from 90 cubic yards to an estimated 550 cubic yards. It has been decided to directly load the soil into trucks instead of staging the soil in roll- off boxes. Additionally, the PRP was required to provide the disposal facility (Solid Waste Managment Landfill in Tunica, MS) with a TCLP sample. The sample was collected on Friday evening, 12/10/10. It has been decided to delay the scheduling of the excavation of the metal shop waste pending disposal requirements and further decisions about the pin flares.

Planned Removal Actions

It has been decided to delay the scheduling of the excavation of the metal shop waste pending disposal requirements and further decisions about the pin flares.

Next Steps

Decide whether treatment will be used onsite to burn the pin flares or will the pin flares be shipped using a new EX number or variance from DOT.

PRP will need to revise their workplan and obtain a contractor to obtain a piece of mechanical equipment to remove the pin flares from the clay matrix and treat the flares.

Schedule the excavations of both pits.

2. Current Activities

2.1 Operations Section

No information available at this time.

2.2 Planning Section

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.