

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #3
Final POLREP
East Ellijay Orphaned Drum

East Ellijay, GA
Latitude: 34.6757292 Longitude: -84.4744027

To:
From: Matthew Huyser, On Scene Coordinator
Date: 1/31/2011
Reporting Period: 11/29/2011 - 1/18/2011

1. Introduction

1.1 Background

Site Number:	B4D9	Contract Number:	EP-S4-07-04
D.O. Number:	EP-G114-00114	Action Memo Date:	1/5/2011
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:	11/25/2010	Completion Date:	1/18/2011
CERCLIS ID:	GAN000410634	RCRIS ID:	
ERNS No.:		State Notification:	11/24/2010
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 contained unknown, potentially hazardous, materials; some of the liquids which appeared to be used oil had leaked and many of the drums were in unstable condition which required over-packing. Any labels that were found on the drums had been worn and may have been outdated, so their true contents were uncertain despite the existence of any labels at all. A trend of labels suggested that many of the drums may have contained outdated roofing installation products, many of which were flammable and some of which were reactive.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

(see POLREP #2)

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA returned to the Site with START on 11/29/2010 to open the drums and collect samples for hazard categorization then bulk samples for analytical testing to complete waste disposal profiles. The drums were opened manually by personnel wearing Level B PPE. Visual observations of the waste noted similarities between several drums, including but not limited to: brown viscous liquids, gray urethane foam/rubber, black liquid, and white viscous paint-like liquid. One drum filled with material could not be

opened, but a legible label was found on its exterior. OSC Huyser determined that visual observations of wastes were thus far consistent with the labels on other drums, despite the materials having degraded past the point of being a useable product, therefore the label would be sufficient to identify the contents of the drum and the MSDS could be submitted for use in waste disposal profiling.

Hazard categorization testing identified the following waste streams: Flammable Liquid, Nonhazardous Solid (foam), Chlorinated Resin, Nonhazardous Liquid, and Oxidizing Liquid. Wastes in each category were bulked in a single sample which was then submitted to a laboratory for the following analysis: VOC TCLP, SVOC TCLP, Metals TCLP, Ignitability, Sulfide Reactivity, Cyanide Reactivity, Total Organic Halides, and BTU value. EPA and START demobilized from the Site on 11/29/2010. Analytical results were forwarded to ERRS contractor, Environmental Restoration, for disposal preparation.

ERRS completed disposal profiling of the wastes and obtained certification that the selected disposal facility was CERCLA-approved. ERRS crews returned to the Site on 1/18/2011, accompanied by START for documentation purposes, to collect the drums from the staging area for transportation and disposal. The drums will be transported by PSC Recovery Systems, LLC and disposed of at the Allworth Inc. facility in Birmingham, AL.

2.1.2 Response Actions to Date

EPA and START visited the Site on 11/29/2010 to collect samples for hazard categorization and waste disposal profiling. START returned to the Site with ERRS on 1/18/2011 to document collection for final disposal of the drums. All materials were removed from the staging area and photo documentation was collected after it was determined that there was no perceptible impact to the staging area.

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

The property owner/developer of the abandoned construction Site on which the drums were discovered was contacted and informed of the response activities. The owner is based in California and had received initial notification of the incident from the East Ellijay Police Department on 11/25/2010.

(Investigations regarding the source, cause, and/or person(s) involved in the dumping of the drums is beyond the scope of this POLREP)

2.1.4 Progress Metrics

(Waste streams have not yet been identified)

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Flammable Liquid	Liquid in Drums	5	007488093 JJK	possible	alternate
Chlorinated Resin	Liquid in Drums	5	007488093 JJK		X
Nonhazardous Solid	Solid in Drums	10	007488093 JJK		X
Nonhazardous Liquid	Liquid in Drums	8	007488093 JJK		X
Oxidizing Liquid	Liquid in Drums	1	007488093 JJK		X

2.2 Planning Section

2.2.1 Anticipated Activities

No further activities are anticipated at the Site

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

2.2.1.2 Next Steps

See Anticipated Activities, section 2.2.1.2

2.2.2 Issues

VOC TCLP results indicated that the Non-Hazardous Liquid bulk sample exceeded the regulatory disposal limit for 1,1-Dichloroethene and would thus have to be coded as a D027 characteristic hazardous waste. OSC Huyser determined that it would be more cost effective to proceed with disposal of this group under this required hazardous waste code rather than re-sample each drum individually to determine which drum(s) had caused the elevated level of 1,1-DCE. This decision was made due to the low volume of waste (8 drums) and relatively higher cost in personnel and time delays to reprocess the data.

2.3 Logistics Section

N/A

2.4 Finance Section

No information available at this time.

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

East Ellijay PD

4. Personnel On Site

EPA OSC Huyser

START TTEMI (2)

ERRS ER (3)

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