

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Welch Group Environmental (WGE) Palmetto Hwy - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #2  
Continued PRP Lead Emergency Response w EPA Oversight  
Welch Group Environmental (WGE) Palmetto Hwy  
B4F6  
Belton, SC  
Latitude: 34.5228881 Longitude: -82.4942948

**To:**  
**From:** Leo Francendese, OSC  
**Date:** 2/20/2011  
**Reporting Period:** 2/14/11 through 2/21/11

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	B4F6	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	PRP Oversight
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>		<b>Start Date:</b>	2/7/2011
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

PRP Lead Emergency Response with EPA Oversight

#### 1.1.2 Site Description

This site is part of the Welch Group Environmental (WGE) CERCLA response. SCDHEC referred WGE operations to ERRB in late December after informing the operator to cease operations.

WGE is a metals recovery company that recovers lead slugs and shell casings from gun ranges. The WGE Palmetto Hwy site was part of WGE's operations and served as storage. This is a multi-use warehouse that serves other clients.

As part of a continuing removal site evaluation (RSE), the OSC was notified by SCDHEC on February 4th that additional operations had occurred at Palmetto Hwy. After securing access from the warehouse owner and WGE's operator, the OSC conducted a walkthru on February 7th.

WGE no longer stores property at this location. XRF readings for lead ranged from the low hundreds to 35000 ppm on the floors and walls of the area where WGE stored property. WGE has indicated that the property will be remediated to the EPA Regional Screening Level of 400ppm.

The OSC had determined that a release or substantial threat of release of a hazardous substance has occurred and presents an imminent and substantial danger to public health.

The OSC has directed the operator to remediate the contaminated section of the warehouse. Workplans will be submitted and become part of the Fair Play and Belton responses. The OSC will continue to consult and coordinate with SCDHEC and EPA R4 RCRA.

The RSE for the WGE properties is expected to be complete by the end of February. Further recommendations will be made at that time.

##### 1.1.2.1 Location

Belton, SC

##### 1.1.2.2 Description of Threat

A release or substantial threat of release of a hazardous substance to the environment has occurred (lead). The release exists at high concentrations at or near the surface that present an imminent and substantial threat to public or welfare.

### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

This site was discovered during a SCDHEC requested RSE at two other WGE facilities, Fair Play and Belton.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.2 Response Actions to Date**

The PRPs have been directed by the OSC to submit workplans for securing the facility and remediating the surfaces. The HASP has been submitted <http://www.epaosc.org/sites/6682/files/WGE%20H&S%20PALMETTO%20Site%20Rev.pdf> and approved as of February 14th. <http://www.epaosc.org/sites/6682/files/WP%20and%20HnS%20Approval%20Memo.pdf>. In addition, the Removal Action Workplan (RAWP) was also submitted <http://www.epaosc.org/sites/6682/files/WelchGroup%20PalmettoHwy%20SOW%2002132011.pdf> and approved on February 14th.

The following operational actions have been completed:

1. The area where the range recovered material were stored was barricaded to restrict access to that part of the warehouse.
2. Paper Floor covering was placed in designated areas along barricade paths and secured with duct tape until remediation activities could occur.

Contractor Daily Progress Reports (DPRs) can be found in the documents section. Here is a link for the 16th: <http://epaosc.org/sites/6682/files/WGE%20BeltonPALMETTO%20Progress%20Notes2162011.pdf>.

The PRP and property owner have notified other users of the warehouse to stay out of the contaminated section of the warehouse and to use the alternate docking bay for operations until those areas have been remediated.

The following environmental actions have been completed:

1. START conducted daily visual inspection of the paper floor covering and barricades for integrity purposes.

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

Access <http://www.epaosc.org/sites/6682/files/EPA%20form%20for%20Cummings%20Gary0001.pdf> has been secured and NOFI <http://www.epaosc.org/sites/6682/files/NOFI%20Final%20signed%20EPA%20form%20for%20Cummings%20Gary0001.pdf> CERCLA Cost Recovery and Legal support have been initiated. The EPA attorney conducted an introductory conference call with the counsel for the PRPs on February 15, 2011.

## **2.2 Planning Section**

### **2.2.1.1 Planned Response Activities**

The PRP will conduct several pilot tests commencing on February 21th to determine if decontamination methods are successful. After cleaning the test areas START will XRF the locations to determine its effectiveness.

### **2.2.2 Issues**

The OSC continues to coordinate and consult with SCDHEC as well as the EPA R4 RCRA Program. RCRA is being consulted with to assure that WGE's offsite collection operations are compliant with necessary federal requirements.

## **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**

- 1 EPA
- 2 START

## **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.