

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #3  
Continued PRP Lead Emergency Response w EPA Oversight  
Welch Group Environmental (WGE) Belton  
B4E7  
Anderson, SC  
Latitude: 34.4832610 Longitude: -82.5636790

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

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	B4E7	<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>	PRP	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	1/31/2011	<b>Start Date:</b>	1/31/2011
<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

Continuation of PRP Lead ER with EPA Oversight

#### 1.1.2 Site Description

Welch Group Environmental (WGE) operated a business that recovered lead and other metals (ie copper) from spent munitions at firing ranges gathered from around the Southeast. They then melted the lead into ingots.

The WGE Belton site conducted material separation as well as distribution of recycled material. In addition, several hundred drums of 'salt formations' are present in drums which are in various conditions.

The WGE Fair Play site conducted material separation as well as melting activities and also has up to 50 drums of uncontained process material.

Both site operations were conducted without South Carolina Department of Health and Environmental Control (SCDHEC) permits. SCDHEC documents that up to 10 WGE employees had significantly high lead levels. SCDHEC ordered the cessation of operations on December 2, 2010. SCDHEC referred the sites to EPA R4 ERRB for removal site evaluation (RSE) on December 22, 2010.

The EPA On Scene Coordinator (OSC) began the removal site inspection during the week of January 31st, 2011 and is coordinating enforcement efforts with SCDHEC using CERCLA response authority. In coordination with Air, Waste and Land Management, Site Evaluation, and Region 1 programs at SCDHEC, the OSC has directed the potentially responsible parties (PRPs) to secure the locations, contain and secure open vessels/drums and construct a sediment/soil containment measure such as silt curtain and hay bales where appropriate.

The PRPs have hired a qualified contractor. Both Health and Safety as well as Removal Action Workplans have been submitted and approved by the OSC in consult with SCDHEC. Work will commence on February 8th. Other removal action may be directed by the OSC as appropriate.

The RSE Report is expected to be complete by the end of February with a subsequent recommendation for further action. The OSC will continue to coordinate enforcement activities with SCDHEC. In addition, the OSC is coordinating with EPA R4 RCRA to assure that WGE proposed gun range recovery activities meet with applicable federal RCRA standards.

#### 1.1.2.1 Location

### 1.1.2.2 Description of Threat

Lead is present at high levels in either soils, sediments, uncontained vessels/drums (approx 12), various equipment and facility floors. These high levels exist at concentrations that are an imminent and substantial threat to public health or welfare.

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

RSE in process. TBC by end of February 2011. See SCDHEC referral package at the documents section of for this site.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.2 Response Actions to Date

PRPs have submitted and received approval for the HASP.

<http://www.epaosc.org/sites/6664/files/Welch%20Group%20Site%20Safety%20Belton%2002072011.pdf> Removal Action Work

Plans <http://www.epaosc.org/sites/6664/files/Welch%20Group%20Belton%20Scope%20of%20Work%2002072011.pdf> and approved <http://www.epaosc.org/sites/6664/files/OSC%20WP%20Approval%20Memo%20Belton.pdf> Work commenced on 2-09-2011 and was completed on 2-17-11.

The following operational tasks have been completed:

1. Over-packed lead material from cardboard containers.
2. One drum of lead material left outside (inaccessible at this time).
3. The following items were stored in the warehouse:
  - 62-55gallon drums of lead dust/related material
  - 1 cardboard box of lead dust/related material
  - 21 metal containers
  - 4-55 gallon drums for HazCatting.
4. Approximately 150 drums of salt material were individually covered with 6 mil liner and clearly identified for future reference.
4. The site is secured until further site activities.

The following environmental task has been completed:

1. Combining historical SCDHEC XRF data with recent EPA XRF data which is available at this link <http://epaosc.org/sites/6664/files/Belton%20XRF%20Results%20Map%20with%20EPA%20and%20SCDHEC%20Data.pdf>

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

Owners and operators have been identified by SCDHEC. OSC conducting enforcement in coordination with SCDHEC. Access agreements <http://www.epaosc.org/sites/6664/files/Access%20at%20Belton.pdf> and Notice of Federal Interest <http://www.epaosc.org/sites/6664/files/Notice%20of%20Federal%20Interest%20-%20Belton,%20SC.pdf> are available on this webpage.

CERCLA Cost Recovery and Legal support have been activated. An introductory phone call between the EPA attorney and PRP counsel took place on February 15, 2011.

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

High concentrations of either lead dust, waste material, contaminated debris and soils will likely result in further recommended removal actions as part of the RSE Report.

On February 17th, the OSC requested that the PRP prepare the following plans for WGE Belton:

- **Waste Characterization Plan** (re. sampling) in order to gather the necessary information for an eventual **Disposal/Recycling Options Analysis**.
- **Decontamination/Demolition Plan** for remaining debris and structures exceeding the lead cleanup criteria.
- **Soils Removal and Disposal Plan** for soils exceeding the cleanup criteria.

The PRP has been requested to provide these workplans by March 4th. It is anticipated that the PRP will be required to provide financial assurance in the upcoming EPA Administrative Order. One of the intentions of the work plan requests is to acquire the needed information for an accurate assessment of financial assurance amounts.

### 2.2.2 Issues

The OSC is coordinating with both SCDHEC and EPA R4 RCRA concerning the proposed continued gun range metals recovery operations of WGE. The current WGE proposal is to conduct all materials separation at the gun ranges. The intent is to assure Federal RCRA compliance before WGE continues with its current business model.

WGE is currently under an OSHA investigation for past melting and recovery operations. Findings and tier report are expected by the end of February.

### **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 OSC
- 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.