

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #3
Continued PRP Lead Emergency Response w EPA Oversight
Welch Group Environmental (WGE) Fairplay
B4F1
Fair Play, SC
Latitude: 34.5233220 Longitude: -82.9913550

To: Keisha Long, SCDHEC

From: Leo Francendese, OSC

Date: 2/21/2011

Reporting Period: 2/14/11 through 2/21/11

1. Introduction

1.1 Background

Site Number:	B4F1	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	PRP Oversight
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/31/2011	Start Date:	1/31/2011
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	1/31/2011
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Continuation of PRP Lead ER w EPA Oversight

Site Description

Welch Group Environmental (WGE) operated a business that recovered lead and other metals (i.e 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 and liquids.

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 commenced 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

Fair Play, SC

1.1.2.2 Description of Threat

Lead is present at high levels in either soils, sediments, uncontained vessels/drums, lead melting process shed, several onsite dump sites, various equipment and brick supplies. 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: [SC DHEC Referral Letter](#)

2. Current Activities

2.1 Operations Section

2.1.2 Response Actions to Date

PRPs have been directed by the OSC to provide both Health and Safety as well as Removal Action Work Plans. These plans have been approved by the OSC [WGE Workplans](#) in consult with SCDHEC and are available in the documents section SOW: [WGE Scope of Work](#) H&S: [WGE HASP](#) Work commenced on February 8th, 2011. SOW includes securing the site, vessel and drum containment of suspected lead contaminated materials, and surface migration containment of suspected soils.

The following operational actions have been completed:

1. The 11 drums and 10 buckets were HAZCATTED. Here is the link for the sample analysis: [WGE HazCat Documentation](#).

The following environmental actions have been completed:

1. EPA collected paint samples for lead analysis from selected vehicles stored on the property.

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

Owners and operators have been identified by SCDHEC. OSC is conducting enforcement in coordination with SCDHEC. Access agreements [Access Agreement](#) and Notice of Federal Interest [NOFI](#) are available on this webpage.

CERCLA Cost Recovery and Legal support have been initiated. Introductory conference call with EPA attorney and PRP counsel was conducted on February 15, 2011.

2.2 Planning Section

2.2.1 Anticipated Activities

Final walkthru with the OSC to affirm as directed SOW for this ER.

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 Fairplay.

- **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.

POLREP #3 Last Updated 2/28/2011