

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 #3
Remediation Progress
Welch Group Environmental (WGE) Palmetto Hwy
B4F6
Belton, SC
Latitude: 34.5228881 Longitude: -82.4942948

To:
From: Leo Francendese, OSC
Date: 2/28/2011
Reporting Period: 2/21/11 through 2/28/11

1. Introduction

1.1 Background

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

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 walkthrough 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.

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

WGE has submitted requested changes in RAWP, including change in contractor. Memo can be found here:

http://www.epaosc.org/site/doc_list.aspx?site_id=6682&RadUrid=e2f3ef11-652a-4562-a20b-e0d67d60e698

The following operational actions have been completed:

1. The area where the range recovered material was stored was barricaded to restrict access to that part of the warehouse.
2. Paper Floor covering was placed in designated areas along barricaded paths and secured with duct tape until remediation activities occurred.
3. Remediation activities began on 2-28-2011. The barricaded path was decontaminated by scrubbing the flooring with half a cup of Trisodium phosphate, both solid and liquid of the product, per gallon of water using wire brushes. GilAir sampling pumps were utilized during the decontamination process for samples to later be submitted to AES laboratory in Atlanta, Georgia to determine ambient lead concentrations present in the work zone.
4. Once the barricaded area received an initial decontamination, START conducted preliminary lead screenings utilizing an XRF to determine if the initial decontamination was successful. Preliminary screening showed that some areas of the barricaded flooring were below the 400 ppm screening level, however other locations had screening levels just above 400 ppm.
6. The barricaded area received a second decontamination and once the flooring completely dried, lead screening was conducted by the PRP's contractor. The area was divided into 2 x 2 grids and labeled using a letter-number system for screening purposes. This round of screening showed lead results ranging from approximately 200 ppm up to 1,200 ppm.
7. During the decontamination process, the PRP's clean up contractor generated 15 gallons of waste water, which was stored in a 55 gallon sealed drum on the premises, and expended 10 mop heads.
8. The barricaded area was covered with plastic to ensure there would be no cross-contamination once all personnel left the site. Decontamination and screening procedures will continue again tomorrow, 3-1-11.

Contractor Daily Progress Reports (DPRs) can be found in the documents section. Here is a link for the 28th:

[http://www.epaosc.org/sites/6682/files/DPR_for_EPA_at_Palmetto_location\[1\].docx](http://www.epaosc.org/sites/6682/files/DPR_for_EPA_at_Palmetto_location[1].docx)

The following environmental actions have been completed:

1. START conducted daily visual inspection of the paper/plastic floor covering and barricades for integrity purposes.
2. START conducted oversight of the decontamination process and conducted confirmation screening of the PRP's contractor data during the screening of the barricaded area.

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.

2.2 Planning Section

2.2.1.1 Planned Response Activities

PRP will submit additional workplan and schedule for remainder of the affected warehouse as part of the upcoming time critical removal action Administrative Order on Consent.

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

1 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.