

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Flex-A-Form Drum Site - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #1  
Initial POLREP  
Flex-A-Form Drum Site  
B4K2  
Anderson, SC  
Latitude: 34.5901430 Longitude: -82.6698200

**To:**  
**From:** Jeffery Crowley, On Scene Coordinator  
**Date:** 6/24/2011  
**Reporting Period:** 6/22/11 - 6/24/11

## 1. Introduction

### 1.1 Background

|                            |           |                                |           |
|----------------------------|-----------|--------------------------------|-----------|
| <b>Site Number:</b>        | B4K2      | <b>Contract Number:</b>        |           |
| <b>D.O. Number:</b>        |           | <b>Action Memo Date:</b>       |           |
| <b>Response Authority:</b> | CERCLA    | <b>Response Type:</b>          | Emergency |
| <b>Response Lead:</b>      | EPA       | <b>Incident Category:</b>      |           |
| <b>NPL Status:</b>         | Non NPL   | <b>Operable Unit:</b>          |           |
| <b>Mobilization Date:</b>  | 6/22/2011 | <b>Start Date:</b>             | 6/22/2011 |
| <b>Demob Date:</b>         |           | <b>Completion Date:</b>        |           |
| <b>CERCLIS ID:</b>         |           | <b>RCRIS ID:</b>               |           |
| <b>ERNS No.:</b>           |           | <b>State Notification:</b>     | 6/21/11   |
| <b>FPN#:</b>               |           | <b>Reimbursable Account #:</b> |           |

#### 1.1.1 Incident Category

Inactive Production Facility

#### 1.1.2 Site Description

##### 1.1.2.1 Location

Site is located at 2060 Frontage Road in Anderson, SC. It is highly visible from Interstate 85 as it is located only 30-40 feet from it. The Site is bordered to the West by I-85, to the north and south by two unnamed creeks and to the East by Lake Hartwell. Approximate Site acreage is 4 acres. There is a resident who lives just to the north of the facility and their driveway comes out right at the Site. The Site consists of three buildings and one transport trailer. The main warehouse building has many holes in the roof and in the foundation. The main lab chemical storage building has no doors and is open to the elements.

##### 1.1.2.2 Description of Threat

The Site poses a threat from the improper storage of high levels of hazardous materials and oils. Upon initial recon the OSC observed approximately 100 - 200 drums, totes, buckets, and other containers of materials with labels ranging from acids to cyanides. Also located on Site is what appears to be a former laboratory area where there are hundreds of lab chemicals including picric acid and isopropyl ether.

In addition to the drums and lab chemicals, there is also several runoff pathways of dead vegetation leading to the creeks. Two of the pathways appear to be stained with oil and animal fats (the owner was making biodiesel) and several others give off a strong chemical odor.

Some of the chemicals identified upon initial recon include: Picric acid, isopropyl ether, ammonium hydroxide, sodium cyanide, arsenic acid, formaldehyde, hydrochloric acid, hydrobromic acid and phosphoric acid.

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

On June 21, 2011 OSC Crowley stopped by the facility to speak with the owner who stated that he was running a biodiesel operation at the facility. The facility was not permitted nor was is actually an operating

business. The OSC walked through the perimeter of the Site and saw enough to notify South Carolina Department of Health and Environmental Control (DHEC) who visited the Site the same day. Based on the observations of DHEC and the OSC the Site was referred to ERRB and OSC Crowley who was conducting work on the American Screw and Rivet Site (which is .5 miles away) initiated an Emergency Response at the Site on June 22, 2011 after obtaining written access from the owner.

**2. Current Activities**

**2.1 Operations Section**

**2.1.1 Narrative**

START arrived onsite on June 22 and conducted air monitoring and conducted a Site walkthrough. The ERRS removal manager from the American Screw and Rivet Site also walked the Site to help identify personnel and equipment resources that would be needed for the cleanup efforts. The full ERRS crew arrived on June 23.

In addition the Anderson County Hazardous Materials Program Manager and a member of the Anderson County Sheriff's Department Bomb Squad were asked to come to the Site by the OSC to inform them of the issues posed by the Site and to ask for assistance in dealing with some of the shock sensitive materials on site. The County has offered the full resources of the county to aid in the cleanup efforts at the Site.

**2.1.2 Response Actions to Date**

To date the following activities have been completed:

- START has conducted air monitoring inside the buildings of the Site and along the perimeter.
- ERRS has cleared off an area to allow for the staging of soil and drums and they have started the process of clearing debris and trash from the Site to allow for crew to operate and stage necessary equipment.
- START has begun hazard categorization of materials with an emphasis on those containers outside the three buildings.
- Security has been established for the Site.

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

The owner of the Site has been identified and stated to the OSC that he does not have the financial means to cleanup the Site. Further enforcement activities have begun. Should a viable PRP be identified they will be given the opportunity to assume the cleanup efforts from EPA.

**2.1.4 Progress Metrics**

| <i>Waste Stream</i> | <i>Medium</i> | <i>Quantity</i> | <i>Manifest #</i> | <i>Treatment</i> | <i>Disposal</i> |
|---------------------|---------------|-----------------|-------------------|------------------|-----------------|
|                     |               |                 |                   |                  |                 |
|                     |               |                 |                   |                  |                 |
|                     |               |                 |                   |                  |                 |

**2.2 Planning Section**

**2.2.1 Anticipated Activities**

**2.2.1.1 Planned Response Activities**

The Site is very complex and will require several phases. The primary phase of the initial response is to stop releases from the Site to the creeks and into Lake Hartwell and to secure any containers that are posing a threat of release. During the next reporting period it is expected that contaminated soils will be dug and open top containers will be transferred to more secure containers.

**2.2.1.2 Next Steps**

**2.2.2 Issues**

The main concern at the Site is the nature of the containers. Many of the are mislabeled and in poor condition. In addition, there is a high presence by the local emergency services community due to the presence of explosive materials and other high hazard items. EPA will need to work closely with local, state, and county officials throughout the cleanup process.

**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**

#### **3.1 Unified Command**

#### **3.2 Cooperating Agencies**

The following Agencies are Cooperating in the cleanup:

South Carolina Department of Health and Environmental Control  
Anderson County Fire Department  
Anderson County Sheriff's Office  
Anderson County Emergency Services Department

### **4. Personnel On Site**

Total on Site personnel for reporting period:

USEPA OSC - 1  
ERRS (ER) - 7  
START (Otie) - 2

### **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.