

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #4
Flex-A-Form Drum Site
B4K2
Anderson, SC
Latitude: 34.5901430 Longitude: -82.6698200

To: Matt Taylor, USEPA R4 ERRB

From: Jeffery Crowley, On Scene Coordinator

Date: 7/19/2011

Reporting Period: 7/11/11 - 7/15/11

1. Introduction

1.1 Background

Site Number:	B4K2	Contract Number:	EP-S4-07-04
D.O. Number:	130	Action Memo Date:	6/30/2011
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	6/22/2011	Start Date:	6/22/2011
Demob Date:		Completion Date:	
CERCLIS ID:	SCD987673458	RCRIS ID:	
ERNS No.:		State Notification:	6/21/11
FPN#:		Reimbursable Account #:	

For background information including Site Description, Location, and Description of Threat please refer to previous POLREPs.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA has transitioned from the Emergency Response Phase of the project into the Time-Critical Removal Phase. However, the dangers at the Site continue to pose an immediate threat to human health and the environment. The current focus at the Site is to mitigate the immediate threats of release from the Site to off-site migration pathways. EPA's estimated time to complete the removal is roughly 4-5 months.

2.1.2 Response Actions to Date

To date the following response activities were completed during this reporting period:

- START continues to air monitoring inside the buildings of the Site and is also started collecting particulate samples using a Data Ram. Levels for particulates fell below action levels.
- USACE visited the Site on July 14 to discuss cleanup strategy with the OSC. There are contamination levels above RALs leading to the banks of the creek. A plan will be developed between EPA and USACE to mitigate the contamination levels.
- Additional Type-C silt fence and rock dams were added to the southern slope to prevent sediment runoff to the creek. In addition, two french drains were added upslope to channel runoff water away from the slope.
- START has hazard categorized nearly 400 containers of materials onsite. This information will be used to develop bulking schemes to transfer materials from unsecured containers into totes.
- The area behind building #2 was investigated and an additional 48 5-gallon totes and 5 drums were segregated and hazcatted. These containers mostly contain corrosive materials. In addition the soil surrounding the containers was screened and had levels of arsenic and lead above EPA RSLs. For lead this would be above 400 ppm.
- PCB screening was conducted in three areas of the Site: the dirt under the hydraulic lift in building #2, the dirt near the AST behind building #1, and in the dirt leading to the northern creek. The only sample that showed levels above 50 ppm was the dirt from the hydraulic lift area. This is most likely from the presence of PCB containing oils in the past.

- EPA and START also walked the northern creek ravine to test for soil contamination there. No levels were found using the XRF above RSLs for any metals. However, there is trash and debris (leaf springs, car parts, etc.) that appears to have come from the facility pushed to the banks of the ravine.
- To date, approximately 900 gallons of acids, 900 gallons of acids with chlorides, and 650 gallons of caustic material have been bulked at the Site.
- Approximately 250 cubic yards of soils have been excavated.
- Security at the Site continues to be conducted by the Anderson County Sheriff's Department.

Other Activities Involving the Site:

- Members of the Anderson County Economic Development Office and Brownfield Office stopped by the Site to offer assistance.
- DHEC also visited the Site to discuss sampling.
- Local Emergency Management Services took a tour of Site to get a feel for what may be needed show a response to the Site be necessary.

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 excavation and stockpiling of contaminated soils, bulking of materials from unsecured containers into secure containers, and hazard categorization of containers onsite will continue.

2.2.1.2 Next Steps

- Excavation and stockpiling of contaminated soils
- Bulking of materials into secured containers
- Transferring contents of unsecured containers into secured containers
- Continue hazard categorization of containers onsite

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

2.4.1 Narrative

The below accounting of expenditures are an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining

Extramural Costs				
ERRS - Cleanup Contractor	\$1,100,000.00	\$150,000.00	\$950,000.00	86.36%
TAT/START	\$50,000.00	\$35,000.00	\$15,000.00	30.00%
Intramural Costs				
USEPA - Direct	\$20,000.00	\$2,000.00	\$18,000.00	90.00%
Total Site Costs	\$1,170,000.00	\$187,000.00	\$983,000.00	84.02%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

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
United States Army Corps of Engineers

4. Personnel On Site

Maximum on-site personnel for reporting period:

USEPA OSC - 1
ERRS (ER) - 7
START (Otie) - 3
DHEC - 2
US Army Corps of Engineers - 2

5. Definition of Terms

ACM - Asbestos Containing Material
EPA - Environmental Protection Agency
EPM - Enforcement Project Manager
ERRB - Emergency Response and Removal Branch
ERRS - Emergency and Rapid Response Services
ERT - Environmental Response Team
MCL - Maximum Contaminant Level
OSC - On Scene Coordinator
PCB - Polychlorinated biphenal
PPE - Personal Protective Equipment
PRP - Potentially Responsible Party
RAL - Removal Action Level
RSE - Removal Site Evaluation
RSL - Removal Screening Level
RFQ - Request For Quote
SCDHEC - South Carolina Department of Health and Environmental Control
START - Superfund Technical Assessment and Response Team
USACE - United States Army Corps of Engineers
XRF - X-Ray Fluorescence

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.

