

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #5
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: 8/1/2011

Reporting Period: 7/18/11 - 7/29/11

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:

- A subcontractor was brought in to lab pack the chemicals in the chemical lab portion of building 2. The lab was completed on July 27; this included neutralizing two containers of picric acid found in the lab.
- 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.
- Several areas of the Site were screened with XRF during this reporting period:
 - Soil behind building 3 leading up to the drainage pathway = Below RALs
 - Materials collected in the blending room floor = values ranged from 2,300 to over 7,000 ppm for As
 - The slope leading from the building to the creek was tested to determine depth of contamination; values began to fall below RALs after 1ft.
 - The flattened area near the creek was also screened to determine depth, values began to fall below RALs after 2ft.
- All of the additional Type-C silt fence and rock dams were added to the southern slope to prevent sediment runoff to the creek.
- START has hazard categorized nearly 560 containers of materials onsite to date. This information is being used to develop bulking schemes. The following are the waste streams created at the Site to date: Acids, Bases, Neutrals, Acid-Chlorides, Acid oxidizer chlorides, Biodiesel, Neutral Chlorides,

Acid oxidizer rinse, flammables, base solids, and acid solids. A household hazardous waste stream is also being created.

- The floor of the blending room of building 1 also collapsed into the lean-to area during this reporting period. Since hazardous materials still remain on the floor a catch pond was put in outside the building to prevent any runoff from leaving the building and entering the creek. The room is physically unsafe to work in and will be addressed during the demolition phase of the project.
- Additional rock was brought in to temporarily cap areas of soil with high levels of arsenic. Once excavation reaches those areas the rock will be removed and the soil excavated.
- Security at the Site continues to be conducted by the Anderson County Sheriff's Department.

Other Activities Involving the Site:

- USEPA and USACE met twice during this reporting period to discuss the creek cleanup strategy.
- DHEC visited the Site to discuss sampling.
- USEPA ERT visited the Site to discuss the creek cleanup strategy as well.

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 forecast recovery.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining

Extramural Costs				
ERRS - Cleanup Contractor	\$1,100,000.00	\$270,000.00	\$830,000.00	75.45%
TAT/START	\$100,000.00	\$70,000.00	\$30,000.00	30.00%
Intramural Costs				
USEPA - Direct	\$20,000.00	\$4,000.00	\$16,000.00	80.00%
Total Site Costs	\$1,220,000.00	\$344,000.00	\$876,000.00	71.80%

* 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) - 2
DHEC - 4
US Army Corps of Engineers - 1

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.

