

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
US Finishing/Cone Mills - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #1
Emergency Response Initiated/Removal Site Evaluation Continued
US Finishing/Cone Mills

Greenville, SC
Latitude: 34.8846284 Longitude: -82.4263000

To:
From: Leo Francendese, OSC
Date: 8/18/2011
Reporting Period: 8/9/2011 thru 8/18/2011

1. Introduction

1.1 Background

Site Number:	A4DD	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	NPL	Operable Unit:	
Mobilization Date:	8/9/2011	Start Date:	8/9/2011
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Inactive Production Facility

1.1.2 Site Description

The above Site was referred to the Environmental Protection Agency (EPA) Region 4 (R4) Removal Program by the R4 Remedial Program for a Removal Site Evaluation (RSE) on May 20th, 2011. As of March 2011, the site has been proposed for the National Priorities List (NPL) with likely listing on the NPL by September 2011. The On Scene Coordinator (OSC) is reviewing a significant amount of historical information pertaining to the above Site. This information can be found at http://www.epaosc.org/site/site_profile.aspx?site_id=6944. The following is a brief history within the context of past business development, ownership and environmental enforcement.

The former US Finishing/Cone Mills site is located at 3555 Old Buncombe Road approximately 3 miles north of downtown Greenville, SC. The property is roughly shaped like a 'V'. The property is approximately bounded by the Reedy River to the west and by Langston Creek and Highway 253 to the east. Within the 'V' exists former millworkers residential housing. Two reservoirs utilized by the facility are located to the north (the former Northern Reservoir) and northwest of the residential area (the former Northwestern Reservoir). Lakeview Middle School is adjacent to the former Northern Reservoir.

In 1890, the brothers Moses and Ceasar Cone formed the Cone Export & Commission Company of Greensboro, North Carolina and had company offices at 61 Worth St. New York City, New York. The most noted of the Greensboro group of mills founded by the Cone Brothers was the White Oak Mills. Construction was begun in 1903 and was completed in 1905.

Operational details from 1903 through 1957 are not available although it is known that the White Oak Mill (facility) was expanded on several occasions. In 1947, the facility was sold to the Aspinoak Corporation and, in 1957, to the Cone Mills Corporation (Cone Mills). Cone Mills operated the facility until 1984 under the name Union Bleachery. American Fast Print, Ltd. (AFP) purchased the facility in May 1984 and operated until November 2003 under the name US Finishing until the main plant was partially destroyed by fire. AFP is the current property owner of a large portion of the facility. In July 2004, Piper Properties purchased approximately 19 acres along the Reedy River from Cone Mills. The facility property is currently in temporary receivership.

The originally named White Oak Mills is the subject of the Remedial Program's referral and is referred to in this document as the 259 acre US Finishing/Cone Mills site.

The following description is a chronological summary of environmental enforcement:

- In November 1980, Cone Mills submitted a Hazardous Waste Permit Application.
- In 1981, Cone Mills submitted a Notification of Hazardous Waste Site to EPA Region 4.
- From 1981 thru 1984, investigations required under South Carolina Department of Health and Environmental Control (SCDHEC) oversight documented excessive chromium contamination in Langston Creek and in groundwater beneath the main facility plant. SCDHEC entered into a Consent Decree in May 1984 with Cone Mills, and AFP requiring continued recovery and treatment of contaminated groundwater.
- In December 1985, SCDHEC completed a Preliminary Assessment (PA) for the Cone Mills Union Bleachery Plant documenting chromium in groundwater.
- AFP completed the Remedial Investigation (RI) from August 1990 to June 1991. Extensive contamination (metals and organics) was documented at various concentrations in groundwater, sludge pits, aeration lagoon, Reedy River floodplain dump, the main plant's basement and chromium and caustic storage areas.
- In June 1993, the SCDHEC Site Screening Section completed a Site Investigation (SI) for the Cone Mills Union Bleachery Plant. Additional documentation of chromium contamination was reported in previously documented source areas, surface waters and fish tissue downgradient of the facility. The Site was assigned a medium priority under CERCLA. Enforcement strategy focused on the PRPs conducting remediation efforts.
- As part of a 1993 Settlement Agreement, Cone Mills conducted contaminated soils removal between 1993 and 1999 of approximately:
 - 3500 tons of hydrocarbons affected soil
 - 7000 tons of chromium affected soil and
 - 3000 tons of caustic affected soil.
- A fire in November 2003 destroyed much of the main facility. Fifteen to 25 million gallons of fire suppression water containing unknown constituents from the facility released to Langston Creek and the Reedy River.
- Due to an impending bankruptcy, Cone Mills removed the groundwater recovery and treatment system from operation in June 2004, after 20 years of operation. The system of recovery wells and treatment was in place to prevent the chromium-contaminated ground water plume from entering Langston Creek and the Reedy River.
- In 2004, SCDHEC completed an Expanded Site Inspection (ESI) for the Cone Mills Union Bleachery facility. Based on the elevated metals findings of the ESI, the facility was given a high priority for further action.
- Removal activities were performed at the facility between October and December 2004 by contractors for AFP (US Finishing).
 - Soil removal activities were conducted at:
 - SW corner of main plant
 - Sediments from the maintenance shop
 - Soils adjacent to an elevated railroad bed
 - Brine pit contents
 - Former water treatment basin contents
- In April 2005, SCDHEC conducted site assessment activities to further evaluate the potential threat to human health and the environment.
- In June 2005, SCDHEC conducted an ESI Update sampling event.
- AFP, Duke Energy Corporation, and Piper Properties of Greenville, Limited Liability Corporation (Piper Properties entered into a settlement agreement with SCDHEC as documented by a Consent Decree in November 2006).
 - Duke Energy conducted removal of PCB contaminated sources
 - In May 2008, SCDHEC petitioned the court to appoint a temporary receiver for property owned by AFP. SCDHEC petitioned the court to appoint a temporary receiver for Piper Properties in April 2009.
- In March 2011, the EPA proposed the Site for the NPL on the strength of the surface migration pathway.
- In May 2011, the EPA's Remedial Program referred the site to the Removal Program for an RSE and is part of the Agency's Integrated Cleanup Initiative (ICI).

1.1.3 Location

The former US Finishing/Cone Mills property is located at 3555 Buncombe Road approximately 3 miles north of downtown Greenville, South Carolina. The property is situated along the Reedy River, and is bordered to the east by Langston Creek and Highway 253, to the west by a residential neighborhood to the north by Old Buncombe Road, and to the south by the Reedy River. Two reservoirs utilized by the facility are located northeast of Buncombe Road (the northern reservoir) and northwest of the residential area (the northwestern reservoir).

1.1.4 Description of Threat

A CERCLA emergency response was initiated on August 9th, 2011 to secure the release of abandoned drums and containers which were suspected to contain hazardous substances (chloroanilines, unknown solids in a swollen drum and waste oils) as well as secure the site due to the release of asbestos. Substantial amounts of asbestos containing material are visible as part of the fire damaged facility. The facility has been posted by the local authorities as a "structure unsafe for human occupancy or use". Despite the posting, significant evidence of trespassor activity is present at the site.

Section 300.415 of the NCP lists the factors to be considered in determining the appropriateness of a Removal Action. Paragraphs (b)(2)(i),(iii),(v), and (vii) directly apply to the Site:

300.415(b)(2)(i): Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.

The site contains substantial fire damaged debris piles which contains visible evidence of asbestos containing material. In addition, asbestos containing materials exists throughout the dilapidated structure in varying conditions of disrepair. Visible evidence exists that trespassors have used the facility and have actively attempted to scavenge. In addition to the physical hazards, trespassors are very likely to have been exposed to these hazardous substances as well as becoming routes of migration. The fence is in disrepair despite the local authorities posting that the "structure is unsafe for human occupancy or use".

300.415(b)(2)(iii): Hazardous substances/pollutants/contaminants in containers which may pose a threat.

Various abandoned drums and containers suspected of containing hazardous substances (chloroanilines, unknown solids in a swollen drum and waste oils) were identified as part of the RSI.

300.415(b)(2)(v): Weather conditions may cause hazardous substance or pollutants/contaminants to migrate or be released.

The facility is in a significant state of structural decline. A combination of structural event failures (collapse) and wind dispersion has the likely potential to release a substantial amount of asbestos into the environment. In addition, it is likely that significant storm events provide a threat of surface water migration of this hazardous substance containing debris.

300.415 (b)(2)(vii): The availability of other appropriate Federal or State response mechanisms to respond to the release

At this time, there are no federal or state government mechanisms that are able to respond to this incident with the resources needed to assume the cleanup.

1.1.5 Preliminary Removal Assessment/Removal Site Inspection Results

The site was referred to the Region 4 Emergency Response and Removal Branch by the Region 4 Remedial Program for a removal site evaluation (RSE) on May 20, 2011 as part of the EPA's Integrated Cleanup Initiative (ICI). The Site was proposed for the NPL on March 11, 2011.

The initial phase of the RSE encompassed the review of 30 years of data and actions taken. As a result of that review, a cross program database with visual representation was created and linked through the links section on the epaossc.net website. Both the database and visual representation are in production (expected to be complete by the end of August) and will enable users (as appropriate) to query the complete database for specific needs during the future remedial investigation (RI) and, or removal action.

The OSC conducted a removal site inspection (RSI) with the RPM, ATSDR, EPA TSS and START on August 9th, 2011. On August 9, 2011, START collected surface water samples from three stations at the aeration lagoon, one station at the reservoir, and one station at the wastewater treatment plant. Two paint chip samples were collected, one from inside the water treatment station building and one from inside the main building. Abandoned drums and small containers were noted during the RSI as well as the dilapidated condition of the fire damaged facility. Extensive asbestos were observed in the fire damaged portion of the facility. The structural integrity of the facility is suspect and presents both a public hazard and likely threat of release to the atmosphere and via surface water migration.

The OSC initiated a CERCLA emergency response on August 9th, 2011 to secure the site via fencing and signage as well as contain and ultimately dispose of the abandoned drums and small containers.

The completed RSE is scheduled for the end of August 2011.

2. Current Activities

2.1 Operations Section

2.1.1 Response Actions to Date

To date the following activities have been completed:

- START has conducted surface water sampling at the site (aeration lagoon, reservoir, and wastewater treatment area).
- START has collected paint chip samples inside two buildings at the site (water treatment and main building).
- ERRS has overpacked the drums for disposal, secured other abandoned containers and temporarily staged the materials at the Parker Fire Department Training Facility (Greenville). Samples have been sent for disposal profiling.
- Repairs to the fence were completed on Aug 12, 2011. Additional no trespassing signage was completed on Aug 12, 2011. Signage with the EPA point of contact will be installed on Aug 19th, 2011.
- The OSC and RPM are in coordination with respective SCDHEC points of contact.
- The OSC is coordinating actions with the EPA Enforcement Program and the facility's receivership attorney.
- The actions are fund lead as the receivership attorney has expressed a lack of funds to address these issues.

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

The OSC has coordinated enforcement activities with the Region both securing access and documenting that the receivership declined the opportunity to conduct the work to be performed during the emergency response.

Should a viable PRP be identified they will be given the opportunity to assume the cleanup efforts from the EPA. The State of South Carolina referred the site to the EPA because contamination remains at the site and because of the bankruptcy of the site owner. Other federal and state cleanup programs were evaluated, but are not viable at this time. EPA received a letter of support for placing this site on the NPL from the state.

2.1.3 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

The completed RSE is scheduled for the end of August 2011.

2.2.2 Planned Response Activities

Sampling will be conducted on the waste piles within the fire damaged facility in order to properly characterize them for future decision making concerning handling.

In addition, the OSC has requested that START conduct a field survey of the damaged portions of the facility.

2.2.3 Issues

This site is part of the EPA's Integrated Cleanup Initiative (ICI). The RPM and his CIC will be the point of contact for community concerns and as such has been listed on the signage as the point of contact.

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

EPA OSC: 1
 ERRS (ER): 3
 START (OTIE): 3
 ATSDR: 3
 EPA TSS: 1
 RPM: 1
 CIC: 1

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.