

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Holcomb Creosote - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #7
Progress
Holcomb Creosote
B4E6
Yadkinville, NC
Latitude: 36.1622924 Longitude: -80.6771124

To: Jim McGuire, USEPA R4 ERRB

From: Karen Buerki, OSC

Date: 8/19/2011

Reporting Period: 7/5/11 to 8/19/11

1. Introduction

1.1 Background

Site Number:	B4E6	Contract Number:	EP-S4-07-04
D.O. Number:	117	Action Memo Date:	3/17/2011
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/20/2011	Start Date:	1/21/2011
Demob Date:		Completion Date:	
CERCLIS ID:	NCD024900987	RCRIS ID:	
ERNS No.:	965285	State Notification:	1/20/2011
FPN#:		Reimbursable Account #:	

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The site was remobilized on July 5, 2011, after the Independence Day Holiday.

2.1.2 Response Actions to Date

ERRS continued to remove creosote lumber, debris, and scrap metal as it was encountered. Two more loads of debris/trash/PPE were removed from the site and two more loads of scrap metal were removed from the site by the PRP during this reporting period. Sorbent boom, strung across the creek to capture sheen, continues to be changed out as it becomes saturated.

Non-haz PAH-contaminated soil disposal resumed. Backfilling on the north end of the site was completed. Mulch was placed on the area and it was sowed with K31 fescue and Rye grass. The sloped areas were seeded and straw erosion matting was put in place. Silt fence was placed along the entire backfilled area.

The RCRA land farm cap was tested for permeability and samples were grabbed from the two locations. The northern location did not meet the permeability requirement of the closure plan.

The slope east of the concrete pit was excavated and screened to remove large amounts of debris. Debris consisted of cable, wooden spacers, work gloves and boots, steel banding, gaskets and seals, paint, oil, and solvent cans, foam insulation, and large pieces of steel. The soil was placed with the F034 stockpile.

The concrete pit was removed and the area was graded with surrounding soil. Creosote was observed in every location that was excavated east of the plant. ERRS continued preparing F034 debris for disposal (less than 3', no free liquids, no protruding rebar). Disposal began on July 11, 2011. Three loads were removed from the site.

Excavation continued inside the process area. Visible contamination was observed under the warehouse floor. Orange snow fence was placed at two feet throughout most of the process area for notification of the presence of creosote contamination. The process room was back-filled and gravelled and restoration began. A septic tank permit application was filed with Yadkin County.

A temporary scale was set up on site. F034 soil disposal began August 1, 2011. The waste is being thermally treated prior to land disposal. A trial load of lesser contaminated F034 soil was sent for chemical oxidation, however, the vendor could not get results that would have made this option for treatment and disposal less costly.

ERT provided a consultation regarding wetlands delineation. A formal wetlands delineation was performed by EPA SESD the week of August 8, 2011. The wetland extends up into the northern portion of the site. Creosote contaminated sediment and silt accumulated in the creek during the removal action was removed using a vacuum truck. This activity was covered under U.S. Army Corps of Engineers General Permit No. 38. Heavy creosote contamination remains in the grey clay creek bottom. The sediment was dewatered through geotextile filter bags.

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

The PRP is Holcomb Creosote Company. Access was granted verbally in a meeting at the Law Offices of Lee Zachary on January 20, 2011. A formal access agreement was signed on May 23, 2011. The remaining assets of the company are tied up in real estate, rendering the company not viable to perform a Removal Action.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
F034/K001 Sludge/Soil	Solid	1462.10 tons	8/01/11 - 8/19/11	Incineration	Bennett Environmental Services St. Ambroise, Quebec, Canada
F034/K001 Sludge/Soil	Solid	est. 23 tons	6046060JJK	Chemical Oxidation	EQ Belleville, MI 48111
Asbestos/ACM	Solid Solid	10 cy 1 cy	4/21/11 5/20/11	Subtitle D Landfill	Republic Services, Inc., Foothills Environmental Lenoir, NC
PAH Soil	Solid	2973.98 tons	5/16/11 - 7/19/11	Subtitle D Landfill	Republic Services, Inc., Foothills Environmental Lenoir, NC
F034 Debris	Solid	est. 60 tons	7675059JJK, 7675060JJK, 7675061JJK	Micro Encapsulation	Envirosafe Services of Ohio, Inc. Oregon, Ohio 43616
Creosote	Liquid	8100 gallons	145582, 145583	Boiler Fuel	Giant Cement Company, Harleyville, SC 29448
Lab Pack/HHW	Solid and Liquid	4 Drums	001170331		Environmental Enterprises, Inc. Atkins, VA
PPE/Debris/Creosote Lumber	Solid	400 cy	155777, 155778, 155779, 155781, 155787, 155780, 155788, 155969, 411249, 411250, 411251, 411252, 411253, 411254	Subtitle D Landfill	Republic Services, Inc. Foothills Environmental Lenoir, NC
					Giant Cement

Diesel	Liquid	730 gallons		Boiler Fuel	Company, Harleyville, SC 29448
Used Antifreeze	Liquid	55 gallons	5/25/11	Recycle	Shamrock Browns Summit, NC
Mercury/Devices	Liquid	4 pounds	001170331	Retort	Environmental Enterprises, Inc. Atkins, VA
Mercury Debris/Soil	Solid	4 drums	001170331		Environmental Enterprises, Inc. Atkins, VA
Refrigerant Oil - Halogenated	Liquid	1 drum	001170331		Environmental Enterprises, Inc. Atkins, VA
Scrap Metal	Solid	47.36 Tons		Recycle	Triad Metal Recyclers Yadkinville, NC

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Excavate haul roads and dispose.

Excavate remaining drip pad and F034 soil in the process area (up to two feet). Place notification barrier in areas with contamination remaining at two feet. Dispose of F034 soil.

Prepare and dispose of remaining F034 debris from stockpile.

Dispose of debris/trash/PPE.

Backfill and seed excavated areas. Install silt fence and erosion matting.

Provide fencing and signage for the RCRA impoundment and creek.

Decon equipment, disconnect utilities, and demobilize site.

2.2.1.2 Next Steps

Dispose of remaining F034 soil and debris. Backfill all remaining excavations.

2.2.2 Issues

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

An emergency response was initiated under the OSC's warrant authority to stabilize the site. TO No. 0117 was issued to Environmental Restoration, LLC, in the amount of \$200,000 and TDD No. TTEMI-05-001-0145 was issued to Tetra Tech in the amount of \$50,000.

A Ceiling Increase and Emergency Exemption Action Memo was signed on March 17, 2011. The new site ceiling is \$3,530,000. The new ERRS ceiling is \$2,440,000 and the new START ceiling is \$500,000.

ERRS - Environmental Restoration, LLC:

Task Order No. EP-S4-07-04 #0117	\$200,000
Task Order No. EP-S4-07-04 #0117 Mod. 1	\$750,000 3/25/11
Task Order No. EP-S4-07-04 #0117 Mod. 2	\$500,000 4/25/11
Task Order No. EP-S4-07-04 #0117 Mod. 3	\$1,000,000 6/09/11

Totals reflect costs through August 19, 2011, and do not account for disposal of all of the contaminated soil or the F034 sludge/debris.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - ER, LLC	\$2,450,000.00	\$2,190,324.89	\$259,675.11	10.60%
START - Tetra Tech	\$335,764.00	\$260,912.24	\$74,851.76	22.29%
ERT - Richard Henry, FWS	\$5,000.00	\$0.00	\$5,000.00	100.00%
Intramural Costs				
Total Site Costs	\$2,790,764.00	\$2,451,237.13	\$339,526.87	12.17%

* 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**2.5.1 Safety Officer****2.6 Liaison Officer****2.7 Information Officer****2.7.1 Public Information Officer****2.7.2 Community Involvement Coordinator**

The Community Involvement Coordinator assigned to the site is Sherryl Carbonaro.

3. Participating Entities**3.1 Unified Command****3.2 Cooperating Agencies**

NCDENR was on site during the Wetlands Delineation performed by EPA-SESD, for the Remedial Program, the week of August 8, 2011.

4. Personnel On Site

1 EPA OSC

1 START

7/8 ERRS - 1 Project Manager, 1 Field Clerk, 2 Equipment Operators, and 3/4 Technicians

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.