

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Welch Group Environmental (WGE) Belton - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #11
Time Critical Removal Actions Continue
Welch Group Environmental (WGE) Belton
B4E7
Anderson, SC
Latitude: 34.4832610 Longitude: -82.5636790

To:
From: Leo Francendese, OSC
Date: 8/20/2011
Reporting Period: 07-11-2011 through 08-22-2011

1. Introduction

1.1 Background

Site Number:	B4E7	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	PRP Oversight
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/31/2011	Start Date:	1/31/2011
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

1.1.2 Site Description

Welch Group Environmental (WGE) operated a business that recovered lead and other metals (ie copper) from spent munitions at firing ranges gathered from around the Southeast. They then melted the lead into ingots.

The WGE Belton site conducted material separation as well as distribution of recycled material. In addition, several hundred drums of 'salt formations' are present in drums which are in various conditions.

The WGE Fair Play site conducted material separation as well as melting activities and also has up to 50 drums of uncontained process material.

Both site operations were conducted without South Carolina Department of Health and Environmental Control (SCDHEC) permits. SCDHEC documents that up to 10 WGE employees had significantly high lead levels. SCDHEC ordered the cessation of operations on 12-2-2010. SCDHEC referred the sites to EPA R4 Emergency Response Removal Branch (ERRB) for removal site evaluation (RSE) on 12-22-2010.

The EPA On Scene Coordinator (OSC) began the removal site inspection during the week of 01-31-2011 and is coordinating enforcement efforts with SCDHEC using Comprehensive Environmental Response Liability Act (CERCLA) response authority. In coordination with Air, Waste and Land Management, Site Evaluation, and Region 1 programs at SCDHEC, the OSC has directed the potentially responsible parties (PRPs) to secure the locations, contain and secure open vessels/drums and construct a sediment/soil containment measure such as silt curtain and hay bales where appropriate.

The PRPs have hired a qualified contractor. Both Health and Safety as well as Removal Action Workplans (RAWPs) for the initial emergency response phase were submitted and approved by the OSC in consult with SCDHEC. Work commenced on 02-08-2011. Other removal action may be directed by the OSC as appropriate.

The RSE Report is expected to be complete by the end of February with a subsequent recommendation for further action. The OSC will continue to coordinate enforcement activities with SCDHEC. In addition, the OSC is coordinating with EPA R4 RCRA to assure that WGE proposed gun range recovery activities meet with applicable federal Resource Conservation and Recovery Act (RCRA) standards.

On 03-03-2011 through 03-04-2011, the clean up crew, oversight contractor and Superfund Technical Assistance and Response Team (START) traveled to the site to conduct decontamination testing on a piece of equipment. The test was done utilizing vinegar as a decontaminating agent to aid in dissolving the lead. The test showed to be effective and the PRP authored documentation for submittal to the OSC to implement the method on other WGE equipment.

The PRP's contractor submitted the site RAWP on 03-05-2011, and after the OSC's review, the RAWP was approved on 03-08-2011. Due to impending approval of the RAWP, there was no work conducted at the site for the week.

The week of 03-06-2011, the PRP had WGE employees Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) trained in an effort to reduce PRP cost of hiring a contractor.

On 03-14-2011, work began at the site with WGE employees decontaminating a piece of equipment primarily used to separate bullets from lead dust and range debris. XRF readings were collected from several locations on the piece of equipment. In areas where the paint had been removed and decontaminated, the reading was under 2,000 ppm. In other areas, the readings were approximately 4,000 ppm. WGE purchased a solvent to dissolve the paint on the piece of equipment and completed removal from half of the equipment. XRF readings were also collected from an additional piece of equipment decontaminated by WGE employees. With exception to a small piece of insulation material on the item, the equipment had lead readings under 1,000 ppm.

Equipment decontamination continued on 03-15-2011 and 03-16-2011, WGE removed the paint from the vibratory screen. Personnel used paint-removing solvent to remove the paint from the screen. The screen was broken down into three pieces. START collected lead readings from the equipment; however the readings were not below 2,000 ppm. WGE personnel purchased Nansulate®, a clear sealant to apply to the pieces of the vibratory screen.

On 03-17-2011, START collected wipe samples of the pieces of the vibratory screen. Sampling was conducted by SESD Wipe (Contaminated Surface) Sampling method 304-R1. Wipe samples were screened with an XRF to determine lead content present on the sample. Locations of the equipment that were screened that were above 400 ppm received an additional coat of sealant, left to dry and wipe sampled again. The equipment received clearance at the end of the day. WGE submitted a vibratory screen cross contamination plan detailing decontamination procedures after future use.

The AOC was finalized and transmitted on 05-12-2011 ([AOC](#)).

During this reporting period no site activities were conducted; however on 08-21-2011, WGE submitted a Waste Management Plan to the EPA for review.

1.1.2.1 Location

Anderson, SC

1.1.2.2 Description of Threat

Lead is present at high levels in either soils, sediments, uncontained vessels/drums (approx 12), various equipment and facility floors. These high levels exist at concentrations that are an imminent and substantial threat to public health or welfare.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

RSE has been completed ([RSI Report](#)). See SCDHEC referral package at the documents section of for this site.

2. Current Activities

2.1 Operations Section

2.1.2 Response Actions to Date

The site is stabilized. Current work is approved for decontamination of select equipment. Operations will be done in accordance with current Health and Safety Plan (HASP).

Future time critical response actions will commence once the draft RAWP is approved.

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

Owners and operators have been identified by SCDHEC. OSC conducting enforcement in coordination with SCDHEC. Access agreements ([Site Access](#)) and Notice of Federal Interest ([NOFI](#)) are available on this webpage.

The signed Enforcement Action Memorandum and AOC was submitted as final on 05-12-2011 ([Action Memo](#)).

2.2 Planning Section

2.2.1 Anticipated Activities

High concentrations of either lead dust, waste material, contaminated debris and soils will result in further recommended removal actions as part of the RSE Report due on 03-4-2011. Further actions will be conducted as part of a time critical removal action under the Administrative Order on Consent ([AOC](#)).

On 02-17-2011, the OSC requested that the PRP prepare the following plans for WGE Belton:

- **Waste Characterization Plan** (re. sampling) in order to gather the necessary information for an eventual **Disposal/Recycling Options Analysis**.
- **Decontamination/Demolition Plan** for remaining debris and structures exceeding the lead cleanup criteria.
- **Soils Removal and Disposal Plan** for soils exceeding the cleanup criteria.

On 06-24-2011 the OSC met in Atlanta with WGE to resolve outstanding RAWP issues. The meeting resulted in establishing timelines and deliverables for time critical removal action at the site ([EPA Memo 06-27-11](#)).

2.2.2 Issues

The OSC is coordinating with both SCDHEC and EPA R4 RCRA concerning the proposed continued gun range metals recovery operations of WGE. The current WGE proposal is to conduct all materials separation at the gun ranges. The intent is to assure Federal RCRA compliance before WGE continues with its current business model.

WGE is currently under an OSHA investigation for past melting and recovery operations.

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

No information available at this time.

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.