

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #11
Time Critical Removal Action Continue
Welch Group Environmental (WGE) Fairplay
B4F1
Fair Play, SC
Latitude: 34.5233220 Longitude: -82.9913550

To: Keisha Long, SCDHEC

From: Leo Francendese, OSC

Date: 8/20/2011

Reporting Period: 07-11-2011 through 08-22-2011

1. Introduction

1.1 Background

Site Number:	B4F1	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:	1/31/2011
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Site Description

Welch Group Environmental (WGE) operated a business that recovered lead and other metals (i.e 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 and liquids.

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 12-02-2010. SCDHEC referred the sites to EPA R4 Emergency Response and 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. 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) have been submitted and approved by the OSC in consult with SCDHEC. Emergency work commenced on 02-08-2011.

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.

• 1.1.2.1 Location

1.1.2.2 Description of Threat

Lead is present at high levels in either soils, sediments, uncontained vessels/drums, lead melting process shed, several onsite dump sites, various equipment and brick supplies. 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

The RSE Report has been completed and submitted to the EPA ([RSI Report](#)). See SCDHEC referral package at the documents section of for this site: [SC DHEC Referral Letter](#)

2. Current Activities

2.1 Operations Section

2.1.2 Response Actions to Date

The site is stabilized. PRP has been given approval to decontaminate certain onsite equipment. Operation is to be conducted in accordance with HASP and work is followed up with daily DPRs.

The OSC is waiting to receive the RAWP for continued action from the PRP. Once the RAWP has been approved, remediation and removal efforts will commence at the site. The PRP requested an amendment to work at the property on 03-15-2011 to include decontamination of on-site equipment. The OSC approved decontamination of the equipment, however no other work is to be implemented at the site ([Work Plan Amendments](#)).

On 03-15-2011:

- WGE personnel was onsite to decon the bobcat and track-hoe. The equipment was deconned on top of a poly sheet, as to avoid water runoff from the decontamination area during cleaning. WGE used vinegar, soap and water during the decon procedure. The Superfund Technical Assistance and Response Team (START) took preliminary lead readings and screened the bobcat periodically to determine if the decontamination process was successful. Some areas of the bobcat had lower lead levels, whereas other locations were still above 2,000 ppm. The bobcat was moved from the decontamination area so WGE personnel could determine another decontamination method.
- Waste generated during the decontamination was bagged, tagged and later placed in a 55-gallon drum.

On 03-16-2011:

- WGE personnel continued with decontamination of the track-hoe. START took preliminary lead readings and screened the track-hoe periodically to determine if the decontamination process was successful. Some areas on the equipment were below 2,000 ppm, whereas other areas were above 2,000 ppm, primarily the tracks on the equipment.
- Waste generated during the decontamination was bagged, tagged and placed in a 55-gallon drum.

On 03-21-11:

- WGE continued with decontamination activities on however WGE was unable to completely decon the track-hoe. WGE indicated they would require a professional contractor to complete the remaining decontamination activities. The latest daily progress report can be viewed at the following link ([DPR 03-23-2011](#)).

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

On 05-30-2011:

- WGE began decontamination of the track driven excavator and bobcat.

On 06-07-2011:

- The EPA verified WGE X-Ray Fluorescence (XRF) field screenings. All readings were below 400 ppm and meets the decontamination criteria as it refers to site requirements. The EPA released the track driven excavator ([Excavator](#)) and bobcat ([Bobcat](#)).

On 07-27-2011:

- WGE contacted the EPA regarding the brick pilot test. WGE was unable to reduce the lead concentrations below the 400 ppm to meet the decontamination criteria as it refers to site requirements.
- WGE screened non-impacted blocks. WGE indicated the three bricks read above the 400 ppm limit.
- Based on the results of the pilot test the EPA decided to establish a background by taking 3 XRF screening shots per block. The average XRF reading would be the calculated background reading.

On 08-08-2011:

- EPA recorded the 3 readings per control test block ([Background Test Results 08-08-2011](#)).
- The XRF screening results indicated lead concentrations below the 400 ppm level.
- Based on the data collected it appears that WGE XRF unit was out of calibration.

On 08-10-2011:

- WGE was informed of the results of the test and was asked to submit a quality assurance plan for review to the EPA.

On 08-21-2011:

- WGE submitted the Waste Management Plan to the EPA for review.
- WGE submitted the XRF Quality Assurance procedures to the EPA for review.

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

Owners and operators have been identified by SCDHEC. OSC is conducting enforcement in coordination with SCDHEC. Access agreements ([Access Agreement](#)) and Notice of Federal Interest (NOFI) are available on this webpage. CERCLA Cost Recovery and Legal support have been initiated. 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. These actions will be conducted as time critical removal actions under an Administrative Order on Consent ([AOC](#)).

On 02-17-2011, the OSC requested that the PRP prepare the following plans for WGE Fair Play.

- **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.

The OSC is currently in discussions with the PRP to resolve issues pertaining to the RAWP.

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 06-27-2011](#)).

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.

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.