

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #7
Flex-A-Form Drum Site
B4K2
Anderson, SC
Latitude: 34.5901430 Longitude: -82.6698200

To:
From: Jeffery Crowley, On Scene Coordinator
Date: 9/16/2011
Reporting Period: 8/29/11 - 9/16/11

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 tree service was also brought in to remove dead or dying trees located in high arsenic areas.
- ERRS also continued conducting activities in preparation for soil excavation. This included building access roads, clearing and grubbing of ground cover and grading. The silt fencing at the Site was also repaired and moved if necessary.
- 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 fall below action levels.
- Several additional areas of the Site were screened with XRF during this reporting period. Included in this area was the soil present inside building 2 where levels for Arsenic are approximately 1,000 ppm. Additional screening was also conducted along the creek banks to better delineate the area.
- The potential CN bomb that was discovered upon initial recon of the site was drenched in a bleach and water bath and opened. The materials inside reacted out and were containerized for disposal.
- Air sparging continues on several totes of bulked materials that were reacting. The air sparging allows the reaction in the tote to occur faster and come to a state of equilibrium.
- ERRS removed containers located in previously inaccessible areas such as high shelves and behind large machinery. Included in this was the containers in building 3 (the shop).
- START has hazard categorized nearly 937 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.

- To date 7,955 gallons of liquids and 5,395 gallons of solids have been bulked at the Site.
- To date, approximately 650 cuyd of soil have been excavated.
- Security at the Site continues to be conducted by the Anderson County Sheriff's Department.

Other Activities Involving the Site:

- USEPA and USACE continue to meet on a regular basis to discuss the creek cleanup strategy.

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 following activities are planned during the next reporting period:

- The main soil excavation on the slope leading to the creek will begin. Air particulates will be monitored in the vicinity of the excavation and the slope will be kept wet during the excavation process.
- Materials that were bulked and lab packed will be disposed of.

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.
- Demolition of contaminated structures.

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

No information available at this time.

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

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.