

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Freeman School Lead Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III

Subject: **POLREP #4**
Continuation of the Removal Action
Freeman School Lead Site
Bramwell, WV
Latitude: 37.3254557 Longitude: -81.3133935

To:
From: Robert Kelly, OSC
Date: 10/4/2011
Reporting Period: through 10/03/2011

1. Introduction

1.1 Background

Site Number:	Contract Number:
D.O. Number:	Action Memo Date: 8/23/2011
Response Authority: CERCLA	Response Type: Time-Critical
Response Lead: EPA	Incident Category: Removal Action
NPL Status: Non NPL	Operable Unit:
Mobilization Date: 9/6/2011	Start Date: 9/7/2011
Demob Date:	Completion Date:
CERCLIS ID:	RCRIS ID:
ERNS No.:	State Notification:
FPN#:	Reimbursable Account #:

1.1.1 Incident Category

CERCLA

1.1.2 Site Description

The Site consists of a multi-story brick school building situated on approximately three acres, located immediately adjacent to the Bluestone River. The Site is located in a relatively rural setting with surrounding properties characterized by mixed land use. Bluestone Baptist Church, currently unused, occupies the adjacent property to the northeast. The remaining adjacent property is undeveloped. Undeveloped forested land is located across County Route 120 to the northwest. The Bluestone River borders the Site to the southeast.

1.1.2.1 Location

The Site is located on County Route 120, approximately 0.4 miles west of Route 52, between Freeman and Bramwell, West Virginia.

1.1.2.2 Description of Threat

Elevated levels of lead in site soils and the interior building on Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

According to available records, the WVDEP first visited the Site in 1987 in response to a citizen complaint that Pinnacle was disposing of battery acid in the Bluestone River. The WVDEP performed several inspections at the Site in 1987, 1988, and 2000. Although a company representative indicated to State inspectors that the reclaimed lead was shipped off-Site for recycling, a make-shift smelter located east of the building indicated that some type of manufacturing process was performed on-Site. State inspectors collected two samples of waste material located outside the building for lead analysis. Total lead concentrations of 656 and 5,280 mg/kg were found in these samples, with a corresponding Toxicity Characteristic Leaching Procedure (TCLP) lead concentration of 73.7 mg/l found in the latter sample.

OSC Kelly conducted a windshield assessment at the Site on May 2, 2011, and determined that a sampling assessment should be conducted at the Site. During the sampling assessment that was conducted on June 28-29, 2011, a total of five surface water samples, five sediment samples, and 15 surface soil samples were collected from the Site. All of the samples collected were analyzed for TAL metals, mercury, and PCBs. Lead was detected at concentrations up to 2.6 ug/L in the surface water samples, up to 68.8 mg/kg in the sediment samples, and up to 116,000 mg/kg in the surface soil samples.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

An action memo for a Removal Action at the site was approved on August 23, 2011. ERRS mobilized to the site on September 6, 2011 to begin the Removal Action.

2.1.2 Response Actions to Date

During the week of September 26, 2011, ERRS continued to consolidate lead-contaminated debris in the 3rd and 2nd floors of the building. ERRS placed these materials in plastic bags and staged them for subsequent disposal. ERRS continued to remove falling plaster and broken windows that presented a safety hazard to personnel. During all building contaminated debris removal activities, START conducted air monitoring activities for particulates. No particulate levels exceeded 0.279 mg/m3 during work activities in the building. However, ERRS and START continued to work in the building areas with Level C respiratory protection. Potential asbestos-containing materials were discovered in the tiles and plaster of the building. ERRS collected samples of these materials and the analytical results verified non-detect and trace asbestos amounts in the materials.

ERRS completed clearing vegetation from the exposed soil areas to the south of the building. START conducted XRF screening activities in the soils and determined an extent of lead contamination in this area. ERRS received a brush hog in order to assist with clearing activities on the remainder of the property.

Large soil piles were discovered in the basement of the building, which are not protected from weather hazards that would cause additional leaching into the exterior site soils. ERRS collected composite soil samples from the basement of the building, in three separate areas; east, west, and central. Analytical results for TCLP metals verified that the eastern and western soil piles are non-hazardous; the central soil piles are hazardous (10.4 mg/L lead). Asbestos insulation was discovered in the ceiling of the building's basement. ERRS will not disturb this material until removal activities progress in the basement area.

ERRS collected composite soil samples to determine T&D for the exterior Site soils. The analytical results suggested that the soils will be disposed of as "non-hazardous". Following excavation and staging of the soils, ERRS will confirm the TCLP lead concentrations prior to disposal activities.

WVDEP and Bramwells's Mayor, Fire Chief, and Sheriff visited the site this week to observe Site operations. The OSC updated all personnel on the progress of the Removal Action.

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

According to available information, the building was constructed in 1948. It was used by the Mercer County school system until approximately 1977. From about 1985 through approximately 1987, Pinnacle Manufacturing, Inc. (Pinnacle) utilized the Site. Pinnacle apparently used the Site to manufacture industrial equipment components from lead recovered on site from lead-acid batteries. The Bramwell Foundation purchased the Site in 1998 and is the present owner.

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

ERRS will continue to conduct activities as set forth in the Action Memo.

2.2.1.2 Next Steps

ERRS will continue to remove contaminated debris from the building.
ERRS will continue to clear vegetation from the property to allow access for sample collection/screening.
START will continue to conduct XRF screening of Site soils to determine an extent of contamination.

2.2.2 Issues

Elevated levels of lead in Site soils and interior building debris.

2.3 Logistics Section

Not Applicable

2.4 Finance Section

2.4.1 Narrative

EPA MacDonald is the Site Administrative Officer.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$500,000.00	\$91,305.25	\$408,694.75	81.74%
TAT/START	\$100,000.00	\$16,642.00	\$83,358.00	83.36%
Intramural Costs				
Total Site Costs	\$600,000.00	\$107,947.25	\$492,052.75	82.01%

* 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

The OSC is the overall Safety Officer for the Site.
The ERRS RM is serving as the Safety Officer for WRS personnel.
The START PM is serving as the Safety Officer for TechLaw personnel.

2.6 Liaison Officer

EPA Jessica Greathouse

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

Not Applicable

3. Participating Entities

3.1 Unified Command

Not Applicable

3.2 Cooperating Agencies

City Government
State Government

4. Personnel On Site

EPA- 1
START- 2
ERRS - 8

5. Definition of Terms

<i>EPA</i>	<i>Environmental Protection Agency</i>
<i>WVDEP</i>	<i>West Virginia Department of Environmental Protection</i>
<i>OSC</i>	<i>On-Scene Coordinator</i>
<i>POLREP/SITREP</i>	<i>Pollution Report/Situation Report</i>
<i>START</i>	<i>Superfund Technical Assessment and Response Team</i>
<i>ERRS</i>	<i>Emergency Rapid Response Services</i>
<i>SAO</i>	<i>Site Administrative Officer</i>

6. Additional sources of information

6.1 Internet location of additional information/report

For additional information, please refer to "Documents" on www.epaosc.org/freeman

6.2 Reporting Schedule

Polreps will be generated on a weekly basis throughout the duration of the Removal Action.

7. Situational Reference Materials

No information available at this time.

POLREP #4 Last Updated 10/7/2011