

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #8  
Flex-A-Form Drum Site  
B4K2  
Anderson, SC  
Latitude: 34.5901430 Longitude: -82.6698200

**To:** Matt Taylor, USEPA R4 ERRB

**From:** Benjamin Franco, On Scene Coordinator

**Date:** 10/4/2011

**Reporting Period:** 9/17/2011 - 9/30/2011

## 1. Introduction

### 1.1 Background

|                            |              |                                |                |
|----------------------------|--------------|--------------------------------|----------------|
| <b>Site Number:</b>        | B4K2         | <b>Contract Number:</b>        | EP-S4-07-04    |
| <b>D.O. Number:</b>        | 130          | <b>Action Memo Date:</b>       | 6/30/2011      |
| <b>Response Authority:</b> | CERCLA       | <b>Response Type:</b>          | Time-Critical  |
| <b>Response Lead:</b>      | EPA          | <b>Incident Category:</b>      | Removal Action |
| <b>NPL Status:</b>         | Non NPL      | <b>Operable Unit:</b>          |                |
| <b>Mobilization Date:</b>  | 6/22/2011    | <b>Start Date:</b>             | 6/22/2011      |
| <b>Demob Date:</b>         |              | <b>Completion Date:</b>        |                |
| <b>CERCLIS ID:</b>         | SCD987673458 | <b>RCRIS ID:</b>               |                |
| <b>ERNS No.:</b>           |              | <b>State Notification:</b>     | 6/21/11        |
| <b>FPN#:</b>               |              | <b>Reimbursable Account #:</b> |                |

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:

- To date START has hazard categorized nearly 938 containers of materials onsite. This information was 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 was 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.
- ERRS decontaminated all empty containers and the rinse water was collected and segregated based on the respective waste stream.
- START took XRF readings of trees, stumps and roots on site. Trees were all non detect, with the exception of one tree with a reading of 27 ppm, likely due to residual soil/dust on the tree. Stumps will remain on site.
- ERRS work stopped due to heavy rainfall on 9/21 and 9/22.
- START started the process of bulking field samples that were hazard categorized and will place the bulk material in to the appropriate waste stream.
- One new 10 lb bag of unknown solid substance found by ERRS was field tested for hazard categorization and placed in the neutral solids waste stream.
- START utilized the XRF to collect readings along the walls and floor of the inside portion of Bldg. 2.

The highest wall reading observed was for lead at 640 ppm, but arsenic was ND in these areas. The highest floor reading for lead was 144 ppm, and arsenic was 2,475 ppm. Exposed soil along the inside building wall was analyzed and had a lead reading of 732 ppm and an arsenic reading of 1,938 ppm.

- START screened soil areas northwest of building 2 near the USACE property to determine the extension of arsenic and or lead contamination.
- ERRS expanded the north western area of the property in order to ensure adequate space for the temporary staging of contaminated soil stockpiles.
- ERRS excavated the following areas until the arsenic and lead values were under the Removal Action Levels:
  - o Soil area in front of all bay doors of Building 1 (western side)
  - o Soil area between Building 1 and Building 2 (northwestern side)
  - o Soil area behind Building 3 (northern side)
- ERRS continues to provide dust suppression by watering during excavation operations.
- START continues to conduct perimeter particulate monitoring in the working zones.
- Tree service company removed the cut tree tops from the site.
- 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. EPA will consult with USACE concerning restoration of areas within USACE boundary.

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
- Arranging for disposal of bulked waste streams
- 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**

**2.4.1 Narrative**

The below accounting of expenditures are an estimate based on figures known to the OSC at the time this report was written. 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.

### Estimated Costs \*

|                           | Budgeted       | Total To Date  | Remaining    | % Remaining |
|---------------------------|----------------|----------------|--------------|-------------|
| <b>Extramural Costs</b>   |                |                |              |             |
| ERRS - Cleanup Contractor | \$1,600,000.00 | \$907,657.00   | \$692,343.00 | 43.27%      |
| START                     | \$200,000.00   | \$142,642.00   | \$57,358.00  | 28.68%      |
| <b>Intramural Costs</b>   |                |                |              |             |
| USEPA - Direct            | \$20,000.00    | \$10,000.00    | \$10,000.00  | 50.00%      |
| <b>Total Site Costs</b>   |                |                |              |             |
|                           | \$1,820,000.00 | \$1,060,299.00 | \$759,701.00 | 41.74%      |

\* 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

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  
United States Army Corps of Engineers

## 4. Personnel On Site

Maximum on-site personnel for reporting period:

USEPA OSC - 1  
ERRS (ER) - 5  
START (OTIE) - 1  
DHEC -0  
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 Stated 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.

POLREP #8 Last Updated 10/25/2011