

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
US Finishing/Cone Mills - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #2  
Time Critical Removal Actions/Public Meeting/Transition to R4 OSC  
US Finishing/Cone Mills

Greenville, SC  
Latitude: 34.8846284 Longitude: -82.4263000

**To:**  
**From:** Leo Francendese, OSC  
**Date:** 10/14/2011  
**Reporting Period:** 8/19/2011 thru 10/14/2011

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	A4DD	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	9/13/2011
<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>	NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	8/9/2011	<b>Start Date:</b>	8/9/2011
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Inactive Production Facility

#### 1.1.2 Site Description

The above Site was referred to the Environmental Protection Agency (EPA) Region 4 (R4) Removal Program by the R4 Remedial Program for a Removal Site Evaluation (RSE) on May 20<sup>th</sup>, 2011. As of March 2011, the site has been proposed for the National Priorities List (NPL) with likely listing on the NPL by September 2011. The On Scene Coordinator (OSC) is reviewing a significant amount of historical information pertaining to the above Site. This information can be found at [EPAOSC USFCM Webpage](#). The following is a brief history within the context of past business development, ownership and environmental enforcement.

The former US Finishing/Cone Mills site is located at 3555 Old Buncombe Road approximately 3 miles north of downtown Greenville, SC. The property is roughly shaped like a 'V'. The property is approximately bounded by the Reedy River to the west and by Langston Creek and Highway 253 to the east. Within the 'V' exists former millworkers residential housing. Two reservoirs utilized by the facility are located to the north (the former Northern Reservoir) and northwest of the residential area (the former Northwestern Reservoir). Lakeview Middle School is adjacent to the former Northern Reservoir.

In 1890, the brothers Moses and Ceasar Cone formed the Cone Export & Commission Company of Greensboro, North Carolina and had company offices at 61 Worth St. New York City, New York. The most noted of the Greensboro group of mills founded by the Cone Brothers was the White Oak Mills. Construction was begun in 1903 and was completed in 1905.

Operational details from 1903 through 1957 are not available although it is known that the White Oak Mill (facility) was expanded on several occasions. In 1947, the facility was sold to the Aspinook Corporation and, in 1957, to the Cone Mills Corporation (Cone Mills). Cone Mills operated the facility until 1984 under the name Union Bleachery. American Fast Print, Ltd. (AFP) purchased the facility in May 1984 and operated until November 2003 under the name US Finishing until the main plant was partially destroyed by fire. AFP is the current property owner of a large portion of the facility. In July 2004, Piper Properties purchased approximately 19 acres along the Reedy River from Cone Mills. The facility property is currently in temporary receivership.

The originally named White Oak Mills is the subject of the Remedial Program's referral and is referred to in this document as the 259 acre US Finishing/Cone Mills site.

The following description is a chronological summary of environmental enforcement:

- In November 1980, Cone Mills submitted a Hazardous Waste Permit Application.
- In 1981, Cone Mills submitted a Notification of Hazardous Waste Site to EPA Region 4.
- From 1981 thru 1984, investigations required under South Carolina Department of Health and Environmental Control (SCDHEC) oversight documented excessive chromium contamination in Langston Creek and in groundwater beneath the main facility plant. SCDHEC entered into a Consent Decree in May 1984 with Cone Mills, and AFP requiring continued recovery and treatment of contaminated groundwater.
- In December 1985, SCDHEC completed a Preliminary Assessment (PA) for the Cone Mills Union Bleachery Plant documenting chromium in groundwater.
- AFP completed the Remedial Investigation (RI) from August 1990 to June 1991. Extensive contamination (metals and organics) was documented at various concentrations in groundwater, sludge pits, aeration lagoon, Reedy River floodplain dump, the main plant's basement and chromium and caustic storage areas.
- In June 1993, the SCDHEC Site Screening Section completed a Site Investigation (SI) for the Cone Mills Union Bleachery Plant. Additional documentation of chromium contamination was reported in previously documented source areas, surface waters and fish tissue downgradient of the facility. The Site was assigned a medium priority under CERCLA. Enforcement strategy focused on the PRPs conducting remediation efforts.
- As part of a 1993 Settlement Agreement, Cone Mills conducted contaminated soils removal between 1993 and 1999 of approximately:
  - 3500 tons of hydrocarbons affected soil
  - 7000 tons of chromium affected soil and
  - 3000 tons of caustic affected soil.
- A fire in November 2003 destroyed much of the main facility. Fifteen to 25 million gallons of fire suppression water containing unknown constituents from the facility released to Langston Creek and the Reedy River.
- Due to an impending bankruptcy, Cone Mills removed the groundwater recovery and treatment system from operation in June 2004, after 20 years of operation. The system of recovery wells and treatment was in place to prevent the chromium-contaminated ground water plume from entering Langston Creek and the Reedy River.
- In 2004, SCDHEC completed an Expanded Site Inspection (ESI) for the Cone Mills Union Bleachery facility. Based on the elevated metals findings of the ESI, the facility was given a high priority for further action.
- Removal activities were performed at the facility between October and December 2004 by contractors for AFP (US Finishing).
  - Soil removal activities were conducted at:
    - SW corner of main plant
    - Sediments from the maintenance shop
    - Soils adjacent to an elevated railroad bed
    - Brine pit contents
    - Former water treatment basin contents
- In April 2005, SCDHEC conducted site assessment activities to further evaluate the potential threat to human health and the environment.
- In June 2005, SCDHEC conducted an ESI Update sampling event.
- AFP, Duke Energy Corporation, and Piper Properties of Greenville, Limited Liability Corporation (Piper Properties entered into a settlement agreement with SCDHEC as documented by a Consent Decree in November 2006).
  - Duke Energy conducted removal of PCB contaminated sources
  - In May 2008, SCDHEC petitioned the court to appoint a temporary receiver for property owned by AFP. SCDHEC petitioned the court to appoint a temporary receiver for Piper Properties in April 2009.
- In March 2011, the EPA proposed the Site for the NPL on the strength of the surface migration pathway.
- In May 2011, the EPA's Remedial Program referred the site to the Removal Program for an RSE and is part of the Agency's Integrated Cleanup Initiative (ICI).
- Links to the above documents associated with these activities can be found on the epa osc website under documents at [EPAOSC USFCM Webpage](#)

### 1.1.3 Location

The former US Finishing/Cone Mills property is located at 3555 Buncombe Road approximately 3 miles north of downtown Greenville, South Carolina. The property is situated along the Reedy River, and is bordered to the east by Langston Creek and Highway 253, to the west by a residential neighborhood to the north by Old Buncombe Road, and to the south by the Reedy River. Two reservoirs utilized by the facility are located northeast of Buncombe Road (the northern reservoir) and northwest of the residential area (the northwestern reservoir).

### 1.1.4 Description of Threat

A CERCLA emergency response was initiated on August 9th, 2011 to secure the release of abandoned drums and containers which were suspected to contain hazardous substances (chloroanilines, unknown solids in a swollen drum and waste oils) as well as secure the site due to the release of asbestos. Substantial amounts of asbestos containing material are visible as part of the fire damaged facility. The facility has been posted by the local authorities as a "structure unsafe for human occupancy or use". Despite the posting, significant evidence of trespassor activity is present at the site.

Section 300.415 of the NCP lists the factors to be considered in determining the appropriateness of a Removal Action. Paragraphs (b)(2)(i),(iii),(v), and (vii) directly apply to the Site:

**300.415(b)(2)(i): Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.**

The site contains substantial fire damaged debris piles which contains visible evidence of asbestos containing material. In addition, asbestos containing materials exists throughout the dilapidated structure in varying conditions of disrepair. Visible evidence exists that trespassors have used the facility and have actively attempted to scavenge. In addition to the physical hazards, trespassors are very likely to have been exposed to these hazardous substances as well as becoming routes of migration. The fence is in disrepair despite the local authorities posting that the "structure is unsafe for human occupancy or use".

**300.415(b)(2)(iii): Hazardous substances/pollutants/contaminants in containers which may pose a threat.**

Various abandoned drums and containers suspected of containing hazardous substances (chloroanilines, unknown solids in a swollen drum and waste oils) were identified as part of the RSI.

**300.415(b)(2)(v): Weather conditions may cause hazardous substance or pollutants/contaminants to migrate or be released.**

The facility is in a significant state of structural decline. A combination of structural event failures (collapse) and wind dispersion has the likely potential to release a substantial amount of asbestos into the environment. In addition, it is likely that significant storm events provide a threat of surface water migration of this hazardous substance containing debris.

**300.415 (b)(2)(vii): The availability of other appropriate Federal or State response mechanisms to respond to the release**

At this time, there are no federal or state government mechanisms that are able to respond to this incident with the resources needed to assume the cleanup.

**1.1.5 Preliminary Removal Assessment/Removal Site Inspection Results**

The site was referred to the Region 4 Emergency Response and Removal Branch by the Region 4 Remedial Program for a removal site evaluation (RSE) on May 20, 2011 as part of the EPA's Integrated Cleanup Initiative (ICI). The Site was proposed for the NPL on March 11, 2011.

The initial phase of the RSE encompassed the review of 30 years of data and actions taken. As a result of that review, a cross program database with visual representation (dataviewer) was created and linked through the links section on the epaossc.net website. Both the database and dataviewer will enable users (as appropriate) to query the complete database for specific needs during the future remedial investigation (RI) and removal action.

The OSC conducted a removal site inspection (RSI) with the RPM, ATSDR, EPA TSS and START on August 9th, 2011. On August 9, 2011, START collected surface water samples from three stations at the aeration lagoon, one station at the reservoir, and one station at the wastewater treatment plant. Two paint chip samples were collected, one from inside the water treatment station building and one from inside the main building. Abandoned drums and small containers were noted during the RSI as well as the dilapidated condition of the fire damaged facility. Extensive asbestos were observed in the fire damaged portion of the facility. The structural integrity of the facility is suspect and presents both a public hazard and likely threat of release to the atmosphere and via surface water migration.

The OSC initiated a CERCLA emergency response on August 9th, 2011 to secure the site via fencing and signage as well as contain and ultimately dispose of the abandoned drums and small containers.

START collected composite samples of the burned debris piles and paint chip samples from partially collapsed brick walls located in the exposed portion of the fire damaged building on August 15. None of the samples analyzed exceeded the TCLP regulatory limits for any compounds analyzed (lead, PCBs, SVOCs, Pesticides and Herbicides). The site webpage has been linked to the Scribe database which includes historic and recent sample information and can be continually added to with new sample information in near real-time. Efforts to combine the EQuis (Remedial) and Scribe (ERRB) database from both the remedial and removal updates will be conducted in phase three of the dataviewer implementation. The dataviewer can be found at: <http://www.usfinishing-conemills.com>. It presently contains 1,263 sample locations with 22,714 sample results. It contains the following Assessments and Removals: 1991 Remedial Investigation/Feasibility Study (RI/FS) 1995 RMT Chrome Removal 2004 ESI 2004 Removal 2005 Site Assessment 2005 ESI Sampling 2006 RI/FS 2007 PCB Assessment 2007 PCB Removal 2010 ACM Assessment

It is expected to include the historical groundwater monitoring results as well as future monitoring results for all media as part of the phase three development and will likely include several thousand more results for that data.

The Agency approved the OSC's Action Memorandum for a Time Critical Removal Action (TCRA) on September 13<sup>th</sup>, 2011. The primary scope in the action is to demolish the fire damaged structures and secure the majority of the material on-site ([September 13th 2011 Approved Action Memo for the USFCM Time Critical Removal Action \(TCRA\)](#)).

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Response Actions to Date**

To date the following activities have been completed (see POLREP #1 for operations conducted prior to this reporting period):

- START has submitted and finalized the Emergency Response and RSI report ([USFCM RSI ER Letter Report](#) )
- START has submitted the EPA Site-Wide HASP (including ERRS Amendment) for removal site activities. EPA has submitted the Plan to SCDHEC.
- START has submitted the Final Perimeter Air Monitoring Plan to ERT for review. The Plan was reviewed and approved by ERT and EPA. EPA has submitted the Plan to SCDHEC ([USFCM Perimeter Air Monitoring Plan](#) ).
- ERRS has prepared and submitted a Proposed Demolition Plan and Schedule for the site to EPA. EPA has reviewed and submitted comments to ERRS. ERRS has revised and resubmitted to EPA. The Plan has been submitted to SCDHEC.
- START and ERT conducted background air sampling at the site as specified in the approved Final Perimeter Air Monitoring Plan. Results of the background air monitoring PM10 data and associated met data have been posted to the website at [www.usfinishing-conemills.com](http://www.usfinishing-conemills.com), under the Time-Critical Removal Action tab. In addition, analytical samples were processed by the laboratory and results are being checked for quality assurance/quality control (QA/QC). The QA/QC completed data will be input into the Scribe database and uploaded to the website ([www.usfinishing-conemills.com](http://www.usfinishing-conemills.com)) under the Time-Critical Removal Action tab.
- START has mounted the web enabled camera at the site and will stream data to the website dataviewer once demolition activities are initiated.
- EPA has submitted the ARARs request ([USFCM OSC ARARs Request Memo to SCDHEC](#) ) to the SCDHEC (September 30, 2011)
- A community joint remedial and removal public meeting was held on Tuesday, October 11, 2011. The OSC presented the EPA time critical removal action plan and introduced the dataviewer as well as addressed public concerns for the site. Public sentiment was positive concerning the action plan. The fact sheet ([October 11, 2011 USFCM Public Meeting Fact Sheet](#) ) and the powerpoint presentation ([October 11, 2011 USFCM Public Meeting TCRA Presentation](#) ) for the meeting are on the epaos website.
- Prior to initiation of perimeter air monitoring during demolition, START and ERT will have in place quality control checks to provide quality control of real-time air monitoring data to the dataviewer on the website prior to posting.
- The waste materials from the emergency response have been properly manifested ([USFCM Emergency Response Disposal Manifests](#) ) and transported from the off-site staging area (Greenville Fire Department) to the disposal facility. Greenville Fire Department expressed an eagerness for future ERRB program training and outreach activities.

#### 2.1.2 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The OSC has coordinated enforcement activities with the Region both securing access and documenting that the receivership declined the opportunity to conduct the work to be performed during the emergency response.

Should a viable PRP be identified they will be given the opportunity to assume the cleanup efforts from the EPA. The State of South Carolina referred the site to the EPA because contamination remains at the site and because of the bankruptcy of the site owner. Other federal and state cleanup programs were evaluated, but are not viable at this time. EPA received a letter of support for placing this site on the NPL from the state.

#### 2.1.3 Progress Metrics

<b>Waste Stream</b>	<b>Medium</b>	<b>Quantity</b>	<b>Manifest #</b>	<b>Treatment</b>	<b>Disposal</b>
Hazardous Liquid/waste	Liquid	55-gal	8329513 JJK		Environmental Enterprises (Ohio)
NonHazardous Solid/waste	Solid	110-gal	18551		CMEG (South Carolina)
Waste Oil	Liquid	55-gal	18551		CMEG (South Carolina)
NonHazardous Liquid	Liquid	380-gal	18551		CMEG (South Carolina)

MSDS Non Hazardous liquid	Liquid	10-gal	18551		CMEG (South Carolina)

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

OSC Francendese is transitioning the site to OSC Tanner. Friday, October 14<sup>th</sup> is the official transition date.

### 2.2.2 Planned Response Activities

Demolition and disposal preparation activities will commence on October 24, 2011. Air sampling will be conducted during all site activities to ensure worker protection and public safety. START is in the process of connecting the live feed web cameras to enable viewing of site activities for the duration of the demolition and disposal.

### 2.2.3 Issues

This site is part of the EPA's Integrated Cleanup Initiative (ICI). The RPM and his CIC will be the point of contact for community concerns and as such has been listed on the signage as the point of contact.

## 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

EPA OSC: 1  
 ERRS (ER): 3  
 START (OTIE): 4  
 EPA Videographer: 1  
 ERT: 2  
 ERT (SERAS): 2

## 5. Definition of Terms

No information available at this time.

## 6. Additional sources of information

### 6.1 Internet location of additional information/report

[EPAOSC USFCM Webpage](#)  
<http://www.usfinishing-conemills.com/>  
<http://www.atsdr.cdc.gov/asbestos/>

### 6.2 Reporting Schedule

## 7. Situational Reference Materials

No information available at this time.