

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #11
Time Critical Removal Action Continue
Welch Group Environmental (WGE) Palmetto Hwy
B4F6
Belton, SC
Latitude: 34.5228881 Longitude: -82.4942948

To:
From: Leo Francendese, OSC
Date: 10/28/2011
Reporting Period: 08-22-2011 through 10-28-2011

1. Introduction

1.1 Background

Site Number:	B4F6	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	PRP Oversight
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:		Start Date:	2/7/2011
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

PRP (Potentially Responsible Party) Lead Emergency Response with EPA Oversight

1.1.2 Site Description

This site is part of the Welch Group Environmental (WGE) Comprehensive Environmental Response Compensation Liability Act (CERCLA) response. South Carolina Department of Health and Environmental Control (SCDHEC) referred WGE operations to Emergency Response and Removal Branch (ERRB) in late December after informing the operator to cease operations.

WGE is a metals recovery company that recovers lead slugs and shell casings from gun ranges. The WGE Palmetto Hwy site was part of WGE's operations and served as storage. This is a multi-use warehouse that serves other clients.

As part of a continuing removal site evaluation (RSE), the On Scene Coordinator (OSC) was notified by SCDHEC on 02-04-2011 that additional operations had occurred at Palmetto Hwy. After securing access from the warehouse owner and WGE's operator, the OSC conducted a site walk on 02-07-2011.

WGE no longer stores property at this location. X-Ray Fluorescence (XRF) readings for lead ranged from the low hundreds to 35,000 ppm on the floors and walls of the area where WGE stored property.

The OSC had determined that a release or substantial threat of release of a hazardous substance has occurred and presents an imminent and substantial danger to public health.

The OSC has directed the operator to remediate the contaminated section of the warehouse. Workplans will be submitted and become part of the Fair Play and Belton responses. The OSC will continue to consult and coordinate with SCDHEC and EPA R4 Resource Conservation and Recovery Act (RCRA).

The RSE for the WGE properties was completed in early 03-2011. Recommendations to continue decontamination of the affected warehouse interior were documented.

The PRP removal action workplan (RAWP) amendments to continue remediation efforts was approved on 03-19-2011 ([Approved Workplan Amendments](#)). Progress of the work can be tracked via daily progress reports (DPRs).

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

1.1.2.1 Location

Belton, SC

1.1.2.2 Description of Threat

A release or substantial threat of release of a hazardous substance to the environment has occurred (lead). The release exists at high concentrations at or near the surface that present an imminent and substantial threat to public or welfare.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

This site was discovered during a SCDHEC requested RSE at two other WGE facilities, Fair Play and Belton.

2. Current Activities

2.1 Operations Section

2.1.2 Response Actions to Date

WGE has submitted requested change in contractor. Memo can be found here: [Contractor Change Document](#)

From 02-28-2011 through 03-01-2011, restricted areas were barricaded in the warehouse. Floors in these areas were covered with paper flooring to prevent dust migration. These restricted areas were decontaminated for lead using Trisodium phosphate (1/2 cup per 1-gallon of water). The floors were scrubbed using wire brushes. XRF screenings were conducted after each area was scrubbed.

At the north end of the warehouse, a sealant prevented decontamination on the flooring. Grinding away two layers of concrete were necessary to sufficiently decontaminate the area. Additional barricades were constructed to prevent spreading dust generated during grinding. Workers wore level C personal protective equipment and a High Efficiency Particulate Air (HEPA) vacuum was used to contain the dust from grinding.

During decontamination, ambient air monitoring was performed with GilAir sampling pumps. Filters are being analyzed for lead. In addition, waste waters generated during decontamination are stored in 55-gallon drums and labeled appropriately for future disposal.

XRF screening levels for lead below 400 ppm are considered decontaminated. Superfund Technical Assistance and Response Team (START) and PRP contractors conducted XRF screenings. After completing decontamination, cleaned areas were sealed with poly to prevent future contamination.

On 03-28-2011:

- WGE began decontamination of the area between the restroom and the shared pathway designated Area A ([Warehouse Decontamination Map](#)). Built containment to contain dust, water and conduct air monitoring activities.
- PRP's contractor started decontamination of area between bathroom and shared pathway, washed with vinegar, and scrubbed with wire brush, vacuumed all water and contained in a 55 gallon drum with lead hazard stickers. A tanvasco grinder was used on the floor, all dust vacuumed and contained in a contractor bag with lead hazard stickers, and placed into a 55 gallon drum. The floor was washed with vinegar to complete decontamination procedures.
- Workers wore level C personal protective equipment and a HEPA vacuum was used to contain the dust from grinding.

On 03-31-2011 through 04-01-2011:

- WGE marked 2 ft by 2 ft grids and conducted XRF readings. START collected confirmation XRF readings. Any readings above 400 ppm were additionally decontaminated and re-screened. All areas in Area A were decontaminated to below 400 ppm ([Warehouse Decontamination Map](#)).

On 04-04-2011 through 04-01-2011:

- WGE began decontamination of designated Area B ([Warehouse Decontamination Map](#)). WGE began decontamination of the walls, steel beams, insulation and ceiling. START collected confirmation XRF readings. Readings were above 400 ppm. As such START conducted wipe sampling at several locations. The locations were below 400 ppm.

On 04-12-2011 through 04-25-2011:

- WGE continued with decontamination of Area B. WGE has completed cleaning the ceiling, walls and side insulation panels (between the top of the building walls and below the roof line).
- START conducted wipe sampling at several locations along the insulation panels. The wipe samples were screened using the XRF. Readings were below 400 ppm.

On 04-26-2011 through 05-16-2011:

- WGE continued with decontamination of Area B. WGE has completed cleaning the walls and steel support beams.
- WGE also completed decontamination of the floor and will mark 2 ft by 2 ft grids and conduct XRF readings.
- WGE will also conduct wipe sampling for XRF screening along the walls and steel support beams.
- During the week of 05-16-2011 START will verify XRF readings.

On 05-17-2011 through 05-19-2011:

- WGE completed decontamination of Area B. START verified WGE XRF results on the floor, walls and support beams. All verified XRF results were below 400 ppm. Contractor Daily Progress Reports (DPRs) can be found in the documents section.

On 05-23-2011 through 06-20-2011:

- WGE also began working on Area C of the warehouse floor, clearing equipment and miscellaneous items.

On 06-21-2011 through 07-11-2011:

- WGE continued working on Area C of the warehouse floor, clearing equipment and miscellaneous items.

On 07-11-2011 through 08-20-11:

- WGE continued working on Area C of the warehouse floor, clearing equipment and miscellaneous items.
- Items that could not be decontaminated were placed in plastic shrink wrap and containerized for future disposal.

On 08-21-11:

- WGE indicated the building warehouse is approximately 80%-90% complete. WGE is in the process of moving impacted material to the Belton facility for future disposal.

On 08-22-11 through 10-28-11:

- WGE continued working on Area C of the warehouse which included cleaning the floor, walls and ceiling. Additional man hours was needed to clear the floor, walls, ceiling and miscellaneous items.
- On 10-21-11, WGE received an EPA Generator Identification Number (SCR000773127).
- WGE transported lead impacted materials generated from the Palmetto site activities to the Belton facility for future disposal.
- WGE indicated that the project is approximately 95% complete. WGE has also indicated that the remaining areas will be completed by 11-04-11.
- WGE will submit the Palmetto Site Closeout Report 30 days following the completion date.

The following environmental actions have been completed:

1. START conducted daily visual inspection of the paper/plastic floor covering and barricades for integrity purposes.
2. START conducted reconnaissance of the decontamination process and conducted confirmation screening of the PRP's contractor data during the screening of the floor path area (loading docks and walk paths).
3. START conducted reconnaissance of the decontamination process and conducted confirmation screening of the PRP's contractor data in the area designated Area A ([Warehouse Decontamination Map](#)).
4. START conducted reconnaissance of the decontamination process and conducted confirmation screening of the PRP's contractor data in the area designated Area B ([Warehouse Decontamination Map](#)).

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

An [Access Agreement](#) has been secured and [NOI](#) CERCLA Cost Recovery and Legal support have been initiated. PRPs have been identified. The signed AOC and Enforcement Action Memorandum was submitted as final on 05-12-2011 ([Action Memo](#)). The work continues under OSC oversight.

2.2 Planning Section

2.2.1.1 Planned Response Activities

PRP submitted additional work plan and [Schedule Revision](#) for remainder of the affected warehouse.

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.

2.2.2 Issues

The OSC continues to coordinate and consult with SCDHEC as well as the EPA R4 RCRA Program. RCRA is being consulted with to assure that WGE's offsite collection operations are compliant with necessary federal requirements.

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.