

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III

Subject: **POLREP #7**
Continuation of the Removal Action
Freeman School Lead Site
Bramwell, WV
Latitude: 37.3254557 Longitude: -81.3133935

To:
From: Robert Kelly, OSC
Date: 11/30/2011
Reporting Period: through 11/22/2011

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 November 14, ERRS completed removal of the lead-contaminated debris in the basement of the building on Site. ERRS encapsulated the asbestos-lined boiler in the basement with poly. ERRS completed decontamination of all four floors of the building by washing the walls and floors. ERRS swept the remaining lead-contaminated debris/soil from the floors and bagged the materials for T&D as "hazardous" materials.

ERRS completed excavation of the lead-contaminated soils located adjacent to the northern side of the building. START screened the soils with the XRF and determined that high levels of lead remained in the northwestern soils. ERRS conducted additional excavation to a depth of approximately one foot in this area. START screened the soils again; all surface soils contained lead below 400 ppm. ERRS backfilled the area with clean soil.

T&D operations of the "hazardous" soils and debris continued. Through November 21, 2011, a total of 73.23 tons of "hazardous" debris (5 trucks of battery casings and bagged lead-contaminated debris from the building) were transported off-Site to Michigan for disposal. In addition, 52.29 tons of "hazardous" soils (4 trucks of lead-contaminated soils from the exterior of the building) were transported off-Site to Michigan for disposal.

ERRS sealed all of the windows in the 2nd and 3rd floors of the building with poly. ERRS barricaded the windows in the 1st floor and all exterior doors of the building with plywood. ERRS ensured that no entrance to the building could be gained by trespassers.

The OSC conducted a walk-through of the building with town officials. There were no concerns with the condition of the building. The OSC continued to update local and State officials concerning all Site activities and progress of the Removal Action.

All personnel demobilized from the Site on November 22, 2011, for the Thanksgiving holiday. Operations at the Site are scheduled to resume on November 29, 2011.

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>
Hazardous-Lead	Soil	12.06 tons	009133276JJK		Landfill
Hazardous-Lead	Soil	9.12 tons	009133287JJK		Landfill
Hazardous-Lead	Soil	15.83 tons	009133277JJK		Landfill
Hazardous-Lead	Soil	15.28 tons	009133278JJK		Landfill
Hazardous-Lead	Debris	12.62 tons	009133349JJK		Landfill
Hazardous-Lead	Debris	13.97 tons	009133350JJK		Landfill
Hazardous-Lead	Debris	9.96 tons	009133351JJK		Landfill
Hazardous-Lead	Debris	22.23 tons	009133352JJK		Landfill
Hazardous-Lead	Debris	14.45 tons	009133359JJK		Landfill

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 conduct excavation activities in the area between the building on Site and the Bluestone River. START will conduct XRF screening of Site soils, where appropriate, to determine an extent of contamination.

2.2.2 Issues

Elevated levels of lead in Site soils.

2.3 Logistics Section

Not Applicable

2.4 Finance Section

2.4.1 Narrative

EPA Joanna McDonald is the Site Administrative Officer.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$504,000.00	\$379,911.58	\$124,088.42	24.62%
TAT/START	\$100,000.00	\$64,266.40	\$35,733.60	35.73%
Contingency	\$120,800.00	\$0.00	\$120,800.00	100.00%
Intramural Costs				
Total Site Costs	\$724,800.00	\$444,177.98	\$280,622.02	38.72%

* 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

Not Applicable

2.7.2 Community Involvement Coordinator

Not Applicable

3. Participating Entities

3.1 Unified Command

Not Applicable

3.2 Cooperating Agencies

City Government

4. Personnel On Site

EPA- 1-2
START- 1-2
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.