

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #3
Progress
US Finishing/Cone Mills

Greenville, SC
Latitude: 34.8846284 Longitude: -82.4263000

To:
From: Terry Tanner, OSC
Date: 12/5/2011
Reporting Period: October 28, 2011 through December 1, 2011

1. Introduction

1.1 Background

Site Number:	A4DD	Contract Number:	
D.O. Number:		Action Memo Date:	9/13/2011
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	NPL	Operable Unit:	
Mobilization Date:	8/9/2011	Start Date:	8/9/2011
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Inactive Production Facility

1.1.2 Site Description

The former US Finishing/Cone Mills site is located at 3555 Old Buncombe Road approximately 3 miles north of downtown Greenville, SC. 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](#)

2. Current Activities

2.1 Operations Section

2.1.1 Response Actions to Date

To date the following activities have been completed:

- 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, under the Time-Critical Removal Action tab. Air monitoring data collected during the removal operations is uploaded to the website (www.usfinishing-conemills.com) under the Time-Critical Removal Action tab.
- On October 24, 2011, ERRS and START contractors mobilized to the site and began preparations for the startup of the removal action. Performance of the Ebam (perimeter) air monitoring units in addition to the Viper (work zone) units were verified by the START contractor. Two track hoes arrived at the site and were refitted with a hydraulic shear and an grappler device by the ERRS contractor.
- On October 29, 2011, the crew began dismantling DB1 (eastern most building). Dust suppression was accomplished by two water trucks equipped with spray hoses. Data from the perimeter air monitoring demonstrated that the dust suppression techniques were effective in preventing off site air migration of contaminants during the dismantling work. All dismantling operations were performed by personnel in level "C" personal protective equipment.
- The waste material produced to date has been segregated into three waste streams: steel/tin, wood and concrete/bricks, and asbestos wrapped piping. The asbestos wrapped piping is being set aside, sprayed with wetting agent, and encased twice (double wrapped) in plastic sheeting. This waste is then marked with caution tape identifying the material as containing asbestos and set aside for off site disposal in a permitted landfill.
- Duke Energy has established electrical service to the site at a location near the construction trailer. A plant fire in 2003 and subsequent vandalism and looting have resulted in site conditions that would make additional service locations cost prohibitive at this time. The placement of Ebams and video surveillance cameras have been modified to accommodate the available electrical service.
- Discussions over placing a portion of the Asbestos Containing Material (ACM) at an on site location

are underway with SC DHEC. At a minimum the SC DHEC is requesting that the waste be placed in a holding area equal to a Class II landfill. SC DHEC has also identified ARARs associated with the removal of asbestos containing material and is working with EPA to address the management of this waste.

- The dismantling of the burned out buildings has been completed for buildings DB1, DB2, and DB3. To date fourteen loads of scrap steel have been transported by Kelly's Metal & Salvage to M&M Scrap for recycling.
- Vessels within the water processing plant have been screened for mercury and trace levels were detected in one section of the plant. These vessels have been secured and will be inspected and addressed at a later date. Site security guards are present during night/evenings and the periphery fencing has been repaired.

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

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
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

2.2.2 Planned Response Activities

The dismantling of the burned buildings will continue as scheduled. Air sampling will be conducted during all site activities to ensure worker protection and public safety.

2.2.3 Issues

EPA is working with the SC DHEC to ensure that all the asbestos containing material within the building debris is managed in accordance with State regulations and that any waste left on site (which would also contain asbestos concentration greater than 1 percent) is secured in a manner consistent with the applicable State regulations.

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.