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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III

Subject: **POLREP #8**
Final Polrep/Completion of the Removal Action
Freeman School Lead Site

Bramwell, WV
Latitude: 37.3254557 Longitude: -81.3133935

To:
From: Robert Kelly, OSC
Date: 12/15/2011
Reporting Period: through 12/15/2011

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:	12/15/2011	**Completion Date:**	12/15/2011
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

On November 28, 2011, ERRS and OSC Francisco Cruz mobilized to the Site. START mobilized to the Site on November 29, 2011. During the week of November 28, 2011, ERRS scraped and excavated 6" of lead contaminated soil from the level area behind the building. After the excavation, START created a grid and screened the surface soil using the XRF to determine if elevated concentrations of lead remained in the soil. All surface soils contained lead concentrations below 400 ppm and no further excavation was necessary. Excavated soil was put into roll-off dumpsters or end dump trailers for T&D as hazardous soils.

ERRS then scraped and excavated 6" of lead contaminated soil from the slope leading to the Bluestone River. After the excavation, START created a grid and screened the surface soil using the XRF to determine if elevated concentrations of lead remained in the soil. A portion of the slope contained high concentrations of lead and an additional 6" excavation was performed at the area of concern. A second XRF screening indicated all lead concentrations below 400 ppm and no further excavation was necessary. Excavated soil was put into roll-off dumpsters or end dump trailers for T&D as non-hazardous soils. START performed air monitoring during all excavation activities. ERRS deconed all equipment after excavation was complete and backfilled all areas behind the building with clean soil.

ERRS performed HAZCAT chemical identification and START performed XRF screening on an unknown drum material discovered inside the building. The material consisted of mostly iron and calcium and was deemed safe to mix with the excavated soil for T&D as hazardous waste. Other miscellaneous chemicals discovered inside the building were placed into drum overpacks for T&D pickup on December 8th.

During the week of December 5, 2011, ERRS graded the soils behind the building. ERRS also repaired the Site access roads that were damage from machinery. ERRS received shipments of stone and finalized access road cover and stability after all equipment had been relocated. ERRS cleaned and positioned the excavator for transportation off-Site. START performed photographic and written documentation of all Site activities. The embankments adjacent to the Bluestone River and access roads, as well as the flat area behind the building were hydroseeded on December 9th.

T&D operations of the "hazardous" soils and debris continued until December 9, 2011. Through December 9, 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 to EQ Detroit in Detroit, Michigan for disposal. Additionally, 200.23 tons of "hazardous" soils (12 trucks of lead-contaminated soils from the exterior of the building) were transported to EQ Detroit in Detroit, Michigan for disposal.

On December 9, 2011, the final T&D operations of "hazardous" materials occurred. Three 55 gallon drums and two five gallon drums of "hazardous" liquids (resins, oils, and flammable liquids) were transported to EQ Detroit in Detroit, Michigan. Five 55 gallon drums of lead and asbestos debris was shipped to Heritage Environmental Services in Indianapolis, Indiana. EAP Industries of Atlasburg, Pennsylvania transported all drummed waste. Two doors containing asbestos were encapsulated in plastic and shipped to Allied Waste Imperial Landfill in Imperial, PA.

During the week of December 12, 2011, the utilities were disconnected from the command trailers and the command trailers were demobilized from the Site. All equipment/personnel demobilized from the Site. The Removal Action was completed.

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 equiptment 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

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

Hazardous-Lead	Soil	23.38 tons	009133283JJK		Landfill
Hazardous-Lead	Soil	23.71 tons	009133282JJK		Landfill
Hazardous-Lead	Soil	13.63 tons	009133281JJK		Landfill
Hazardous-Lead	Soil	23.36 tons	009133285JJK		Landfill
Hazardous-Lead	Soil	23.16 tons	009133286JJK		Landfill
Hazardous-Lead	Soil	12.32 tons	009133284JJK		Landfill
Hazardous-Lead	Soil	16.69 tons	009133280JJK		Landfill
Hazardous-Lead	Soil	11.69 tons	009133279JJK		Landfill
Hazardous-Lead	Soil	15.28 tons	009133278JJK		Landfill
Hazardous-Lead	Soil	15.83 tons	009133277JJK		Landfill
Hazardous-Lead	Soil	9.12 tons	009133287JJK		Landfill
Hazardous-Lead	Soil	12.06 tons	009133276JJK		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
D001 (resin)	Liquid	55 gal	008770793JJK		Landfill
N/A (oily water)	Liquid	55 gal	008770793JJK		Landfill
D001 (aerosols)	Liquid	10 gal	008770793JJK		Landfill
D001 (flammable liquid)	Liquid	55 gal	008770793JJK		Landfill
D008	Debris	275 gal	08770794JJK		Landfill
N/A (doors)	Debris	2 doors	N/H Data Form		Landfill

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Response activities are complete.

2.2.1.2 Next Steps

No further EPA actions are anticipated.

2.2.2 Issues

There are no further issues involving EPA on this Site.

2.3 Logistics Section

Not Applicable

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

The OSC is 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
State Government

4. Personnel On Site

EPA- 1-2
START- 1
ERRS - 4

5. Definition of Terms

EPA	*Environmental Protection Agency*
WVDEP	*West Virginia Department of Environmental Protection*
OSC	*On-Scene Coordinator*
POLREP/SITREP	*Pollution Report/Situation Report*
START	*Superfund Technical Assessment and Response Team*
ERRS	*Emergency Rapid Response Services*
SAO	*Site Administrative Officer*

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.