U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Flex-A-Form Drum Site - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #10**
Continuation of Removal Action
Flex-A-Form Drum Site
B4K2
Anderson, SC
Latitude: 34.5901430 Longitude: -82.6698200

To:
From: Benjamin Franco, On Scene Coordinator
Date: 12/19/2011
Reporting Period: 10/23-11/07/2011

1. Introduction

1.1 Background

Site Number:	B4K2	**Contract Number:**	EP-S4-07-04
D.O. Number:	130	**Action Memo Date:**	6/30/2011
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	6/22/2011	**Start Date:**	6/22/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:	SCD987673458	**RCRIS ID:**	
ERNS No.:		**State Notification:**	6/21/11
FPN#:		**Reimbursable Account #:**	

For background information including Site Description, Location, and Description of Threat please refer to previous POLREPs.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA has transitioned from the Emergency Response Phase of the project into the Time-Critical Removal Phase. However, the dangers at the Site continue to pose an immediate threat to human health and the environment. The current focus at the Site is to mitigate the immediate threats of release from the Site to off-site migration pathways. EPA's estimated time to complete the removal is approximately March 1, 2012.

2.1.2 Response Actions to Date

To date the following response activities were completed during this reporting period:

- A total of four semi trucks were loaded with the remaining drums, overpacks and totes containing various acids, bases, chlorides, flammables and oxidizers and were removed by EPA's ERRS disposal subcontractor. Air quality readings were taking inside the truck during the placement of the waste and found none detects for VOC and LEL.

- Three Core samples from building #2's cement floor were collected from the warehouse area and 1 sample was obtained from the former lab room. The highest reading of concrete and soil were submitted for laboratory analysis of As. XRF direct reading Building #2's cement floor indicated values ranging from 9.78ppm to 2032ppm.

- EPA 's ERRS contractor continued excavated contaminated soils west of building #2. The soil adjacent to soil foundation under building 2 (west side) were 1743 ppm for As. Approximately, 68 readings were taken using the XRF during the excavation to track As levels, requiring the additional excavation of several areas.

- START screened the floor and ceiling in Building #3 using the XRF. Tested the floor and found

Arsenic at levels of 155, 195 and 201 ppm with the XRF in the test area. The area was cleaned three (3) times with a dilute hydrochloric acid mix to attempt to remove metals (i.e. arsenic). This resulted in a reduction of 47% to 78% in As, but still were above action levels. The floors were cleaned and sealed with an epoxy to seal in the arsenic to the cement floor.

- Soil removed surrounding the buried septic tank area that was located behind building #1 failed TCLP test for Cadmium (Cd). The results came back at 1.85 to 2.44 mg/L and were above the regulatory TCLP requirement of 1.0 mg/L. The soils will need to be treated with a stabilizing agent in order for it to be disposed of in a non-hazardous waste disposal facility. Th treatment will bind the Cd to the soil and will reduce the ability of the soil to leach Cd. OSC Franco requested that ERRS contractor obtain bids from vendors that may provide soil treatment agents. ERRS will provide a representative soil samples of the soil waste stockpiles to the different treatment vendors. Through bench scale testing, the vendors can then give a range of treatment agent to contaminated soil. Normally at these levels, we expect the treatment stabilizing powder to be added at a 3 to 7% rate.

Other Activities Involving the Site:
USEPA and USACE continue to meet on a regular basis to discuss the creek cleanup strategy. EPA will consult with USACE concerning restoration of areas within USACE boundary.

The owner of the Site has been identified and stated to the OSC that he does not have the financial means to cleanup the Site. Further enforcement activities have begun. Should a viable PRP be identified they will be given the opportunity to assume the cleanup efforts from EPA.

2.1.4 Progress Metrics

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

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

The following activities are planned during the next reporting period:

- The main soil excavation on the slope leading to the creek will begin.
- Removal of contaminated sediments from an adjacent stream.
- Air particulates will be monitored in the vicinity of the excavation and the slope will be kept wet during the excavation process.
- Obtain bids for treatment of contaminated soils that have failed for Cd for waste disposal purposes.

2.2.1.2 Next Steps

- Excavation and stockpiling of contaminated soils
- Demolition of contaminated structures.

2.2.2 Issues

Now that all of the dangerous chemicals have been removed from the Site, EPA will focus on removing contaminated soils that contain As. EPA will continue to work closely with local, state, and county officials throughout the cleanup process.

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

3.1 Unified Command

3.2 Cooperating Agencies
The following Agencies are Cooperating in the cleanup:

South Carolina Department of Health and Environmental Control
Anderson County Fire Department
Anderson County Sheriff's Office
Anderson County Emergency Services Department
United States Army Corps of Engineers

4. Personnel On Site

Maximum on-site personnel for reporting period:

USEPA OSC - 1
ERRS (ER) - 5
START (OTIE) - 1
DHEC -0
US Army Corps of Engineers - 1

5. Definition of Terms

ACM - Asbestos Containing Material
EPA - Environmental Protection Agency
EPM - Enforcement Project Manager
ERRB - Emergency Response and Removal Branch
ERRS - Emergency and Rapid Response Services
ERT - Environmental Response Team
MCL - Maximum Contaminant Level
OSC - On Scene Coordinator
PCB - Polychlorinated biphenal
PPE - Personal Protective Equipment
PRP - Potentially Responsible Party
RAL - Removal Action Level
RSE - Removal Site Evaluation
RSL - Removal Screening Level
RFQ - Request For Quote
SCDHEC - South Carolina Department of Health and Environmental Control
START - Superfund Technical Assessment and Response Team
TCLP - Toxicity Characteristic Leachate Procedure
USACE - United Stated Army Corps of Engineers
XRF - X-Ray Fluorescence

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.