

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #13
Progress
Welch Group Environmental (WGE) Fairplay
B4F1
Fair Play, SC
Latitude: 34.5233220 Longitude: -82.9913550

To: Keisha Long, SCDHEC

From: Greg Harper, OSC

Date: 1/10/2012

Reporting Period: 10/28/2011 through 12/31/2011

1. Introduction

1.1 Background

Site Number:	B4F1	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	PRP Oversight
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/31/2011	Start Date:	1/31/2011
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	1/31/2011
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Site Description

Welch Group Environmental (WGE) operated a business that recovered lead and other metals (i.e copper) from spent munitions at firing ranges. The recovered materials were gathered from around the Southeast. WGE then melted the lead into ingots.

The WGE Belton site conducted material separation as well as distribution of recycled material. In addition, several hundred drums of 'salt formations' are present in drums which are in various conditions.

The WGE Fair Play site conducted material separation as well as melting activities. The WGE Fair Play site also has up to 50 drums of uncontained process material and liquids.

Both site operations were conducted without South Carolina Department of Health and Environmental Control (SCDHEC) permits. SCDHEC documented that up to 10 WGE employees had significantly high lead levels. SCDHEC ordered the cessation of operations on December 12, 2010. SCDHEC referred the sites to EPA R4 Emergency Response and Removal Branch (ERRB) for removal site evaluation (RSE) on December 22, 2010.

The EPA On Scene Coordinator (OSC) began the removal site inspection during the week of January 31, 2011 and coordinated enforcement efforts with SCDHEC using CERCLA response authority. In coordination with Air, Waste and Land Management, Site Evaluation, and Region 1 programs at SCDHEC, the OSC directed the potentially responsible parties (PRPs) to secure the locations, contain and secure open vessels/drums and construct a sediment/soil containment measure such as silt curtain and hay bales where appropriate.

The PRPs have hired a qualified contractor. The qualified contractor Health and Safety as well as Removal Action Workplans (RAWPs) have been submitted and approved by the OSC in consult with SCDHEC. The initial stabilization work commenced on February 8, 2011.

The OSC will continue to coordinate enforcement activities with SCDHEC. In addition, the OSC is coordinating with EPA R4 RCRA to assure that WGE proposed gun range recovery activities meet with applicable federal Resource Conservation and Recovery Act (RCRA) standards.

WGE has decided to conduct removal operation without the assistance of a contractor. The OSC has

received the RAWP from the PRP. Once the WGE site Health and Safety Plan is approved, remediation and removal efforts will commence at the site. The PRP requested an amendment to work at the property on March 15, 2011 to include decontamination of on-site equipment. The OSC approved decontamination of the equipment ([Work Plan Amendments](#)), however no other work is to be implemented at the site

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

On June 27, 2011, EPA sent a memorandum to WGE, the subject was "Schedule Milestones for the Time Critical Removal Action at the Welch Group Environmental (WGE) Fairplay Site, Anderson County, South Carolina" establishing a removal action timeline.

1.1.2.1 Location

The site is located at 170 Feltmen Farm Road in Fair Play, Oconee County, South Carolina.

1.1.2.2 Description of Threat

Lead is present at high levels in either soils, sediments, uncontained vessels/drums, lead melting process shed, several onsite dump sites, various equipment and brick supplies. These high levels exist at concentrations that are an imminent and substantial threat to public health or welfare.

2. Current Activities

2.1 Operations Section

2.1.2 Response Actions to Date

The site is stabilized. PRP has been given approval to decontaminate certain onsite equipment. Operation is to be conducted in accordance with HASP and work is followed up with daily DPRs.

On October 26, 2011 EPA met on site with START and WGE. The meeting was scheduled in order to transfer OSC duties from OSC (Leo Francendese) to OSC (Greg Harper). WGE was informed of the change and any further site approvals will be reviewed by OSC Greg Harper. WGE is working to complete the clean-up actions at the WGE Palmetto Hwy site.

WGE completed the clean-up activities at the WGE Palmetto Hwy site in mid-November. WGE's established timeline and deliverables established in the removal action work plan and June 27, 2011 Memorandum to WGE therefore the time critical removal action at this site have been delayed. After the site Health and Safety Plan (HASP) is approved WGE will begin on-site removal activities.

On November 17, 2011 EPA met on site with START and WGE. The meeting was to discuss the site Waste Management Plan, the plan is to be complete as part of WGE AOC. WGE will incorporate EPA comments to the Waste Management Plan.

On December 12, 2011, EPA met on site with WGE. The meeting was to discuss the submitted site Health and Safety Plan approved by WBE certified industrial hygienist (CIH). WGE will revise the CIH site HASP and incorporate it into a Fair Play site HASP.

On December 22, 2011 WGE submitted the revised Waste Management Plan to the EPA.

On December 23, 2011 WGE submitted the revision of the site Health and Safety Plan to the EPA for review.

2.2 Planning Section

2.2.1 Anticipated Activities

As part of the Administrative Order on Consent ([AOC](#)), the OSC requested the PRP prepare the following plans for WGE Fair Play site.

- **Waste Characterization Plan** (re. sampling) in order to gather the necessary information for an eventual **Disposal/Recycling Options Analysis**.
- **Decontamination/Demolition Plan** for remaining debris and structures exceeding the lead cleanup criteria.
- **Soils Removal and Disposal Plan** for soils exceeding the cleanup criteria.

In mid November WGE completed the clean-up activities at the WGE Palmetto Hwy site. So the established timeline in the June 27 , 2011 memorandum for this site have been adjusted, WGE will begin clean-up operations after the approval of their site HASP.

WGE will address EPA for comments to the site HASP.

EPA anticipates finalizing the site HASP and beginning removal actions in February.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining

Extramural Costs				
TAT/START	\$45,761.00	\$19,041.00	\$26,720.00	58.39%
Intramural Costs				
Total Site Costs	\$45,761.00	\$19,041.00	\$26,720.00	58.39%

* 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

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

Welch Environmental Group - 1

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.