

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #12
Continuation of Removal Action
Flex-A-Form Drum Site
B4K2
Anderson, SC
Latitude: 34.5901430 Longitude: -82.6698200

To: Matt Taylor, USEPA R4 ERRB

From: Benjamin Franco, On Scene Coordinator

Date: 1/12/2012

Reporting Period: 12/8/2011-12/22/2011

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 demolition permit was obtained through SCDHEC to remove Buildings 1 and 2. A third party asbestos inspection was performed and found no asbestos in either building. The history of the site was reviewed and the obtained material was used to complete the state permit forms. On December 16, SCDHEC granted the demolition permit under an "ordered demolition". On December 19, Building 2 was taken down under with the presence of a certified asbestos inspector, as requested by the state. The metal was segregated for recycling and the concrete floor will be disposed of in a Subtitle D landfill. The soil under the concrete did have arsenic impact ranging from non-detect to approximately 1600 ppm on the eastern edge. The southeast corner had arsenic levels in the 100's. Roughly 15 feet from the edge of the former concrete slab, the XRF instrument indicated arsenic levels that were at 195 ppm.
- A total of 2,500 cubic yards of excavated contaminated soil failed the TCLP test for cadmium and will need to be treated before disposal in a landfill. ERRS contractor, ER, requested bids on stabilizing agent and provided a soil sample to three companies that were interested in supplying a stabilizing agent. Based on a combination of costs and performance, the bid was awarded to a company

that uses Free Flow soil stabilizing agent. Stockpile #1 that had failed the TCLP test at 3.61 ppm was treated with the agent. The stockpile was divided into four equal parts and blended with Free Flow at specified ratios. The purpose was to determine the amount of Free Flow needed to achieve the required disposal value. In the first quarter of soil, for every 12 skid steer buckets loads, one quarter skid steer bucket of Free Flow was added and thoroughly blended in a pit. In the second batch, for every 12 skid steer bucket of soil, a half of skid steer bucket load of Free Flow was added. For the third batch three quarters of a bucket of Free Flow was added and finally a full skid steer bucket of Free Flow was added. The range of mixture was from 2% to 6%. Samples were taken for each and sent to a certified laboratory to undergo TCLP testing for cadmium. Results will be given in January.

- A new erosion control system was installed after the excavation of the western slope next to building 1 was completed.
- Approximately 11,000 tons of excavated dirt has been stockpiled on Site waiting for disposal. Of that amount, approximately 3,000 tons need to be treated with the Free Flow stabilizing soil agent.
- ERRS, START and EPA demobilized for Christmas break on December 21, 2011 and will return to the Site on January 2, 2012.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

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:

- Prepare building 1 for demolition and conduct demolition of the building. A crane will need to be brought on Site to move a large piece of machinery that is owned by the owner/operator. The equipment weighs 20,000 lbs and cannot be lifted with an excavator.
- Conduct air particulates monitoring in the vicinity of the demolition.
- Determine the effectiveness of the soil treatment and treat other soil stockpiles.
- Continue to maintain silt fencing.

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

2.4.1 Narrative

The below accounting of expenditures are an estimate based on figures known to the OSC at the time this report was written. 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.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining

Extramural Costs				
ERRS - Cleanup Contractor	\$1,600,000.00	\$1,221,489.00	\$378,511.00	23.66%
START	\$200,000.00	\$142,642.00	\$57,358.00	28.68%
Intramural Costs				
USEPA - Direct	\$20,000.00	\$10,000.00	\$10,000.00	50.00%
Total Site Costs	\$1,820,000.00	\$1,374,131.00	\$445,869.00	24.50%

* 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

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 States 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.

