U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Liberty Fibers - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #13**
Landfill Open/ ACM Debris Disposal Operations Begins
Liberty Fibers
B457
Morristown, TN
Latitude: 36.1493481 Longitude: -83.2048083

To:
From: David Andrews, On Scene Coordinator
Date: 2/3/2012
Reporting Period:

1. Introduction

1.1 Background

Site Number:	B457	**Contract Number:**	EP-S4-07-02
D.O. Number:	# 0115	**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:	4/21/2010	**Start Date:**	4/21/2010
Demob Date:		**Completion Date:**	
CERCLIS ID:	937191	**RCRIS ID:**	
ERNS No.:		**State Notification:**	4/15/2010
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category
Time-Critical Removal Action
Primary Taks: Consolidate and dispose of demolition debris (and associated waste) containing asbestos.

1.1.2 Site Description
The Liberty Fibers site (Site) is located at 4855 Enka Highway, Morristown, Hamblen County, Tennessee. The geographic coordinates for the Site are 36.15580 degrees north latitude and -83.20645 degrees west longitude. The Site is bordered to the north by a railroad, tree line, and a small residential neighborhood; to the east by a landfill and a retention pond; to the south by the Nylon Staple Plant; and to the west by farmland. The Site is approximately 1,050 feet above sea level. The topography of the site is relatively flat.

1.1.2.1 Location
The site is located at 4855 Enka Highway approximately one mile south of Interstate 81 (off Exit 12) in Morristown, Tenn in the Lowland Community.

1.1.2.2 Description of Threat
During recycling activities on April 19th, a debris pile along the southern perimeter caught fire resulting in the Morristown Fire Dept responding. In order to minimize such future events, and to minimize the chance of asbestos exposure, the OSC elected to serve the owner with a Notice of Federal Interest in order to initiate site containment and mitigation measures. The site contains numerous construction debris piles with large quantities of friable asbestos.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results
Concurrent to the April 19th fire and recent activities on site, the OSC requested that Region 4 Technical Services Branch evaluate asbestos sampling conducted in Jan 2010 to determine if a threat to human health and the environment existed on site. A draft memo from Technical Services completed on April 21st indicates that such a threat exist.

2. Current Activities

2.1 Operations Section

2.0 Current Activities
November 30 through December16: ERRS completed the final phases of the on-site disposal cell construction. Perimeter berms were shored and installation of a subsurface drainage (approx 700-feet) was completed. The drainage line (26-in diam) was a diversion of a concrete line that runs diagonally under the middle of the former pond. TDEC regulations prohibit plumbing/drainage structures under landfills. Additionally, 200-yards of access road was ammended from the powerhouse and into the landfill to

accomodate heavy equipment traffic and delivery of debris scheduled to begin within the first few weeks of 2012. START and ERRS continued final review and modification of the site work plan specific to asbestos work and the "clean grid strategy" that will take work across the site from west to east closing out grids (200-ft X 200-ft.) as each area is cleaned.

January 10 to present: ERRS began debris hauling operations to the landfill. The START initiated perimeter (8-locations) air monitoring for asbestos around the immediate hot-zone of the former plant structures. The perimeter of the hot-zone is approximately 1.25 miles and included the power house and the former rayon manufacturing buildings which are 90% demolished or partially demolished and the rubble piles contain asbestos.

****** The OSC is currently working on a *Ceiling Increase & Change of Scope Action Memorandum* to petition for additional funding to continue the removal operations. A change of scope will be neccessary to focus the removal operations more heavily on the concentrated areas of asbestos containing materia/debris which borders the businesses on the south side of the Lowland Complex. ********

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

The Liberty Fibers site is a former rayon fiber manufacturer located in Morristown, Hamblen County, Tennessee. According to briefing memorandum prepared by the Tennessee Department of Environment and Conservation (TDEC), Liberty Fibers filed for bankruptcy in September 2005. A&E Salvage Company (formerly J&N Salvage Company) bought the salvage rights to the Liberty Fibers property in October 2006. The salvage rights include any and all equipment and materials located on the property and the option to purchase the property.

In September 2006, TDEC, in coordination with EPA, conducted a site visit in response to a tip that TDEC had received regarding demolition activities and the presence of hazardous materials, including polychlorinated biphenyls (PCBs), on the site. During the site visit, TDEC observed approximately 24 transformers and 80 capacitors that were labeled as containing PCB oil. Also in September 2006, the Commissioner of TDEC received a letter from the Mayor of Morristown expressing his concern about the potential for a release of on-site PCBs, asbestos, and other chemicals during the ongoing salvage operations at the site. During a discussion in October 2006 among representative from EPA, A&E Salvage, Liberty Fibers, the court-appointed trustee, and TDEC, A&E Salvage Company acknowledged that it was owner of the PCB containing equipment and that it would accept full legal responsibility for proper removal and disposal of the PCB equipment in compliance with applicable regulations.

A&E Salvage Company submitted a plan to EPA in January 2007 for sampling and removal of all transformers and capacitors located at the site. A&E Salvage Company contracted SD Myers to sample the dormant on-site transformers and capacitors, and submit the samples for PCB analysis. The energized transformers and capacitors could not be sampled until Morristown Utilities later powered-down the electrical lines to the site during renovation of the old lines servicing the site and adjacent properties. SD Meyers sampled a total of 39 transformers: 4 transformers contained PCB oil, 12 units were found to have oil containing PCBs and the remaining 23 units did not contain PCB oil or residue. A&E Salvage Company later contracted with Booher Industrial Company, located in Jasper, Georgia to remove and dispose of the transformers. However, EPA later notified A&E Salvage Company that Booher Industrial Company was not an EPA-approved treatment, storage and disposal facility for PCB waste in accordance with the Toxic Substances Control Act (TSCA).

In March 2007, A&E Salvage Company held a meeting with IPI Business and Morristown Utilities, during which the City of Morristown decided to annex the Liberty Fibers site and include the site as part of its Urban Growth Boundaries. As a result, the City of Morristown would be responsible for providing utility services including power and water to the Liberty Fibers site.

In March 2008, the EPA Resource Conservation and Recovery Act (RCRA) and Oil Pollution Act Enforcement and Compliance Branches contacted Region 4 Emergency Response and Removal Branch (ERRB) regarding conducting a removal assessment of the facility. An EPA On-Scene Coordinator (OSC) reviewed documents submitted by TDEC and scheduled a site visit. On March 20-21, 2008 the OSC, supported by START, conducted a site visit with representatives from TDEC, EPA Asbestos, EPA RCRA and EPA TSCA as well as representatives from Liberty Fibers and A&E Salvage Company. During the site walk, the OSC and START observed several drums, totes, and tanks; bags labeled as “asbestos containing material” (ACM); a 50,000 gallon sulfuric acid tank containing approximately 8-inches of material; known and suspected PCB-containing articles and oils; and suspected ACM; as well as discolored soil throughout the property. In addition, the Liberty Fibers representative identified the on-site concrete vault that, at that time, contained six 10,000-gallon tanks used to store carbon disulfide, and extremely flammable chemical used in the manufacturing of rayon. To prevent fire and explosion, the vaults were typically filled with water, submerging the tanks. The Liberty Fibers representative also identified a leak in the western wall of the concrete vault, which appeared to have left the carbon disulfide tanks only half submerged in water within the vault and, therefore, represented a significant hazard. Samples collected during this site visit identified surface soil and water identified PCBs and concentrations between 300 mg/kg and 2,500 mg/kg.

In December 2009, an EPA OSC, START and TDEC conducted another site visit with a representative of A&E Salvage Company. The representative of A&E Salvage Company advised the OSC & TDEC that the carbon disulfide tanks within the concrete vaults had not contained any product, had been removed from the vault sometime in the Spring 2009, and had been sold for scrap metal. The tanks had been removed because of the potential for explosion. During that visit, the water had submerged the tanks was still contained in the vault. The Power Mechanical Shop contained bagged asbestos waste, and the Welding Shop contained PCB-contaminated transformers and capacitors. Although the facility is partially demolished, the debris fields – mixed with ACM – remain. Recycling and reclamation operations were

ongoing, and at least one metals recycling business was operating on the site.

From January 18-22, 2010, EPA conducted a removal assessment (RA) of the site. The RA had six objectives: 1-) collecting bulk asbestos samples; 2-) conducting a geophysical investigation in an attempt to identify the location of possible buried transformers; 3-) collection of aqueous and solid waste samples from the carbon disulfide tank vault and surrounding area; 4-) collecting solid waste samples from two neutralization pits; 5-) collecting waste samples from on-site totes and drums; and 6-) collecting personal and area air samples for PCM analysis to evaluate the level of exposure of site personnel to airborne asbestos fibers during the assessment and to determine the concentration of airborne that might be migrating off site.

On April 21, 2010, EPA and START conducted an emergency response site assessment in response to a debris fire on-site. The fire occurred in the foundation of a demolished cooling tower located on the west side of the site. An emergency removal action was initiated under the OSC's warrant authority and The OSC mobilized the Emergency Rapid Response Service (ERRS) contractor to the site on April 22, 2010.

ERRS was initially tasked to concentrate on safety related elements of the site including marking and temporarily covering known asbestos containing debris piles and stacked thermal cast insulation from steam piping. Several of the structures associated with the former rayon plant have been demolished. However, several of these structures have basement areas which were not readily visible especially when dressed out in Level C and presented a significant safety threat to clean up workers. ERRS was instructed to mark and fence off those basement containing structure.

In order to minimize the amount of airborne migration of friable asbestos across or off-Site due to windy conditions or during handling of the material, ERRS fixed the friable asbestos fibers in place via application of "lock down agent" on the debris. This lock-down agent is a water soluble polymer which is a spray-application over debris piles and acts as an adhesive coating and temporarily resistant to weather or minimal disturbance of the material.

2.1.2 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

EPA has initiated the enforcement process and has identified the RPs for this Site.

2.1.3 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Asbestos Containing Material	**Demolition Debris**	**500 cu ydsd**	**N/A**	**N/A**	**On-Site Landfill**

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Continue to construct and prepare landfill to receive asbestos contaminated debris.

2.2.1.2 Next Steps

Begin hauling contaminated debris to on-site landfill (location- former retention pond)

2.2.2 Issues

None at this time.

2.3 Logistics Section

N/A

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

The OSC (D. Andrews)

2.6 Liaison Officer

N/A

2.7 Information Officer

N/A

2.7.1 Public Information Officer

N/A

2.7.2 Community Involvement Coordinator

The Community Involvement Coordinator assigned to the site is Ms. Sherryl Carbonaro.

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

TDEC Department of Solid Waste (Knoxville Office) consults on the design and preparation of the on-site landfill.

4. Personnel On Site

As of Jan 10, 2012:

1 EPA OSC (Andrews/Buerki rotation)
1 START (P. Prys & B. Erickson : Tetra Tech EMI)
16/17 ERRS (CMC, Inc) - 1 Project Manager, 1 Field Clerk, I Foreman, 12 Equipment Operators, 2 Laborers

5. Definition of Terms

Asbestos - A generic name given to a number of naturally occuring hydrated mineral silicates that possess a unique crystalline structure, are incombustible in air, and separate into fibers. Asbestos includes asbestiform varieties of chrysotile (serpentine); crocidolite (riebeckite); amosite (cummingtonite-grunerite); anthophyllite; tremolite, and actinolite.

NESHAP - National Emission Standards for Hazardous Air Polutants

AHERA - Asbestos Hazard Emergency Response Act.

6. Additional sources of information

6.1 Internet location of additional information/report

No Information available at this time.

6.2 Reporting Schedule

7. Situational Reference Materials

No information available at this time.