

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Lobeco Products - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #2
Completion of Site Stabilization and Assessment
Lobeco Products
B4N5
Seabrook, SC
Latitude: 32.5556550 Longitude: -80.7294280

To: Shane Hitchcock, USEPA R4 ERRB

From: Terry Stilman, On-Scene Coordinator

Date: 2/27/2012

Reporting Period: January 18-20, 2012

1. Introduction

1.1 Background

Site Number:	B4N5	Contract Number:	
D.O. Number:		Action Memo Date:	1/17/2012
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/17/2012	Start Date:	1/17/2012
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

1.1.2 Site Description

The LP site operated as a specialty chemical manufacturer for more than 40 years, from 1966 to 2009. The product lines included dyes, farm chemicals, drilling fluid chemicals, herbicides, pesticides, and general specialty chemicals. The property has been abandoned since December of 2010, with power off to most or all of the property.

The property includes 125 acres of land surrounded by agricultural, rural residential, and undeveloped property. The closest cross road is Keans Neck Road, located to the northeast. Currently the site maintains a portion of the chemical processing structures, a storage/warehouse, a lab testing area, offices and the waste water treatment facility. Part of the processing facility has been demolished but the rubble remains onsite; there is concern for asbestos in the demolition debris.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The site was initially owned by Tenneco Chemicals, Inc. The Tenneco Chemicals Berkshire Color Division constructed the plant for the production of dyestuff intermediates in 1967.

While operating under Tenneco the facility used Monsanto Corporation's Aroclor 1248 PCB product as a heat transfer oil. The hot oil system in which Aroclor 1248 was used malfunctioned at times. Untreated liquids from an on-site lagoon were discharged directly into an adjacent stream, Whale Branch, which flows into Campbell Creek, and ultimately the Atlantic Ocean. In 1983 SC DHEC conducted an in-stream assessment of Campbell Creek and Whale Branch. A follow up SC DHEC study in December 1984 revealed the presence of PCBs in the immediate vicinity of the Lobeco plant effluent discharge point. As a result of this finding the facility conducted groundwater testing and produced a groundwater monitoring report which revealed the presence of PCBs at the Lobeco Plant.

Based on this information Tenneco Products commissioned further tests in order to characterize the extent and location of the PCB problem at the Lobeco Plant. Initial soil borings indicated the presence of PCBs in the abandoned lagoon. In 1986 G & E Engineering, hired by SC DHEC, issued a preliminary investigation report pinpointing the location of the PCB contamination at the lagoon and burn site areas. In 1987, under the first of three SC DHEC consent orders, cleanup of the PCBs commenced and was concluded by November 1991. A subsequent well survey of residential wells was performed and found no PCB contamination of groundwater existed in the neighboring wells.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

Based on a DHEC request for assistance, EPA's Emergency Response and Removal Branch (ERRB) conducted an initial site walkthrough to determine potential sampling locations. During the November Site visit, approximately 9 - 250 gallon totes of suspected acid and several drums were found scattered throughout the Site. In addition, several above ground storage tanks labeled sulfuric acid and a debris pile containing suspected asbestos containing materials were observed.

Plans for sampling of the containers, the debris pile and on-site a waste treatment plant were discussed with DHEC. A subsequent sampling plan was prepared by EPA's START contractor for review by ERRB and DHEC.

EPA's Site Investigation Section and DHEC also planned to conduct sampling of potentially contaminated soils, sediment and surface water, focusing on longer-term contamination issues.

On January 17, 2012, OSCs Stilman and Berry, arrived at the Site with EPA's START contractor to conduct a sampling assessment of the facility. Upon arrival, OSCs Stilman and Berry observed the totes of suspected acid to be bulging and generally in poor condition. Based on the presence of containers of hazardous substances in poor condition and the lack of on-site facility personnel, OSC Stilman activated EPA's ERRS contractor (ER) to conduct stabilization actions.

On January 18, 2012, ERRS arrived on site and transferred the acid into new totes. From January 18 until January 20, 2012, crews collected all portable containers from around the site, segregating empties from ones containing material. START opened and sampled each container and then performed field hazard characterization tests on those samples. Additionally, ERRS used a boom lift to reach access ports on the tops of the ASTs around the site. Most ASTs were found to be empty, but several were found to contain several thousand gallons of unknown liquids. These were also sampled (where possible) and field tested.

During this reporting period, START completed sample collection of the surface impoundments and large ASTs at the wastewater treatment plant. Samples of the water within each impoundment and any sediment found therein were collected and submitted to an analytical laboratory for analysis.

Additionally, EPA, START, and ERRS inventoried the contents of the on-site former quality control laboratory. After reviewing the inventory and in consultation with ERRS and START, OSC Berry determined that given the unknown contents of the lab, the safest approach was to bulk the neutral solids and liquids into two large containers, which ERRS performed in Level B personal protective equipment. Additionally several of the additional waste streams, such as flammable liquids and oils, were also consolidated into existing waste streams on site. Some chemicals whose compatibility was unknown were left to be lab packed at a later date. No reactions were observed during any of the bulking.

Once bulking was complete, START, ERRRS, and OSC Berry designed preliminary waste streams and composite samples of each waste stream were collected. There are 8 general waste types: acid liquids, basic liquids, flammable liquids, petroleum liquids, neutral liquids, chlorides, oxidizer, and bulk solids. A total of 11 samples were submitted for analysis. Once laboratory data is received, EPA will use the results and material safety data sheets to make waste determinations on the material.

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

EPA contacted the present owner of the property and received consent for access to conduct assessment and stabilization actions. EPA has requested additional consent to perform the removal of hazardous materials or contaminants or pollutants at the site. The present owner has expressed interest in performance of the removal activity. EPA is currently negotiating an Administrative Order on Consent with the property owner.

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

EPA is currently negotiating an AOC with the property owner. Based on the outcome of those negotiations, EPA will return to the site to either perform the removal action directly or oversee the property owner's efforts to dispose of the material.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$50,000.00	\$13,752.00	\$36,248.00	72.50%
TAT/START	\$25,000.00	\$3,000.00	\$22,000.00	88.00%
Intramural Costs				
Total Site Costs	\$75,000.00	\$16,752.00	\$58,248.00	77.66%

* 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

South Carolina Department of Health and Environmental Control

4. Personnel On Site

During Reporting Period

EPA - 2
ERRS - 6
START - 3

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.