

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #15
End of Excavation Activities
Flex-A-Form Drum Site
B4K2
Anderson, SC
Latitude: 34.5901430 Longitude: -82.6698200

To:
From: Benjamin Franco, On Scene Coordinator
Date: 3/22/2012
Reporting Period: 3/5/2012-3/23/2012

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:	6/21/2011
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 April 30, 2012.

2.1.2 Response Actions to Date

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

Activities performed during the week of March 5th:

- ERRS contractor transported off-site Stockpiles 19T, 15 and 21T for a weekly total of 1,391 tons of contaminated soil removed.
- START contractor conducted XRF screening the surface of Zone 6 and 7 where the stockpiles have been located to ensure that there were no residual contamination left behind. XRF readings in the area indicated levels in the range of 50 ppm to 122 ppm. The contamination was contained to the first 6 inches of soil. OSC tasked ERRS contractor to scrape the surface to that level in both Zone 6 and 7.

Activities performed the week of March 12th:

- ERRS contractor finished removing first six inches of Zone 6 and 7. The material from these areas became stockpile 22 and 23.
- ERRS contractor also finished excavating the pit that was located in the lean to area next to Building 1. The material from this area was placed in Stockpile #24.
- All zones that were initially sampled are clear of contamination and excavation operations have finished.

- ERRS sent waste samples from the three stockpiles for TCLP analysis.
- ERRS received the plants and trees that were outlined in the stream restoration plan.
- OSC and ERRS project manager (PM) met with a representative with SCDOT to discuss the conditions of Frontage Rd that leads to the Site. The SCDOT representative surveyed the road and came to the conclusion that the road did not require resurfacing but just minor patch work. He stated that his District Office will do the work for free.

Activities performed the week of March 19th:

- ERRS contractor received waste results and Stockpile #23 failed TCLP analysis for cadmium at 1.07 mg/L. This will require treatment of the stockpile with Free Flow. Because the value was so close to 1.0 mg/L requirement, ERRS ordered and received 20 tons of Free Flow 200 stabilizing agent instead of 200/300 mix.
- ERRS contractor disposed off-site 401 tons of contaminated concrete to a Subtitle D landfill. The concrete came from the chemical blending and biodiesel rooms in Building 1 and from Building 2.
- ERRS contractor started off-site disposal of Stockpile #22 and #24.
- ERRS contractor continues with grading western side of the property.
- ERRS contractor received erosion control mats and hydroseeding supplies.
- The OSC, ERRS PM and START personnel met on Site with USACE personnel to discuss the stream restoration plan.

Analytical Results of Stockpiled Material that failed the TCLP limit for non-hazardous waste of 1. mg/L for cadmium. Soil above this limit is considered hazardous waste and must be treated before it can be disposed in a Subtitle D Landfill. The treatment standard for cadmium is .11 mg/L or an alternative treatment standard of 90% reduction of the initial TCLP value and below 1.0 mg/L, in order to meet the Land Disposal Requirements for Subtitle D Landfills.

Stockpile #	Cadmium Initial TCLP Result (mg/L)	Cadmium TCLP Result After Treatment(mg/L)
7	3.43	.019
6	1.84	.011
1	3.61	.036
8	2.44	.017
9	2.64	.026
19	24.9	.091
20	23.2	.071
21	2.87	.119
23	1.07	Requires Treatment

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Non-Hazardous, Arsenic and Cadmium Contaminated Soil (Total soil)	Soil	8,793 tons		None	Upstate Regional MSW Subtitle D Landfill
Hazardous, Cadmium Contaminated Soil Treated On-Site	Soil	3,003 tons		Free Flow 300/200	
Magnesium Oxide	Bulk	4 tons		None	Upstate Regional MSW Subtitle D Landfill
Scrap Metal	Scrap Metal	24.9 tons		Cleaned	Belton Metals Recycling
Drums	Metal	3.4 tons		Cleaned	Upstate Regional MSM Subtitle D Landfill
Non-friable Asbestos	Vinyl Floor Tiles with Mastic	1 cubic yd		None	Enterprise C&D Landfill (TSCA)
Cement Pad	Cement	401 tons			Upstate Regional MSM Subtitle D

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:

- ERRS contractor will Treat Stockpile #23 with Free Flow 200.
- ERRS will continue with site restoration activities.
- START contractor will assist with the placement of plants and trees and the shaping of the stream bank.

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 arsenic. 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) - 6
 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.