

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #15
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: 3/22/2012

Reporting Period: February 16 through March 16, 2012

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 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. WGE remediation and removal efforts have 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 which was approved by the OSC.

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. This removal action time line was delayed due to the clean-up activities at the WGE Palmetto Site.

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 soils, 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

On February 20, 2012 WGE began removal operations at the WGE Fairplay Site. WGE personnel began by repaired the erosion control fencing placed on site during the emergency actions January 2011. They labeled and inventoried the drums and trailers on the site.

EPA and START OTIE were on site February 21-22, 2012 to complete an extent of soil contamination, START used the XRF to screen the soil samples. A total of 38 grids have been determined to be over the removal action level. Following the screening, START created an extent of soil contamination map and a table of all screening data points.

During the week of February 27, 2012, WGE's new Project Manager, Micah Wallace, began work at the site. WGE established a personnel decontamination line and a debris staging area. They began screening debris, concrete block, scrap steel and the roll-off box with the XRF.

During the week of March 5, 2012, WGE screened pallets of concrete block and set-up a site work trailer. WGE project manager updated and submitted the site Health and Safety Plan and Waste Characterization Plan.

During the week of March 12, 2012, the U.S. Coast Guard Strike Team was mobilized to the site to conduct oversight of the PRP and conduct conformation screening of items to remove from the site. The Waste Characterization Plan was approved by the OSC on March 12, 2012. WGE screened and segregated 170 of various items during the week.

2.2 Planning Section

2.2.1 Anticipated Activities

WGE will continue to identify and segregate on-site waste into the different waste streams identified in the Waste

Characterization Plan. They will identify facilities to receive scrap steal and landfill to receive the different waste streams from the site and submit the facility for approval by the EPA OSC.

As part of the Administrative Order on Consent (AOC), the OSC requested the PRP prepare written plans for WGE Fair Play site. The following two plans have to be prepared by WGE.

- Decontamination/Demolition Plan** for remaining debris and structures exceeding the lead cleanup criteria.
- Soils Removal and Disposal Plan** for soils exceeding the cleanup criteria.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
START	\$45,761.00	\$26,256.00	\$19,505.00	42.62%
Intramural Costs				

Total Site Costs	\$45,761.00	\$26,256.00	\$19,505.00	42.62%
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* 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 – 4
USCG Strike Team – 1
EPA - 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.

POLREP #15 Last Updated 3/28/2012