

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Biotech Industries - Removal Polrep
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #7
Final
Biotech Industries
B4E3
Newton, NC
Latitude: 35.6140810 Longitude: -81.3654540

To:
From: Kenneth Rhame, OSC
Date: 3/29/2012
Reporting Period: March 12, 2011 through February 1, 2012

1. Introduction

1.1 Background

Site Number:	B4E3	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/24/2011	Start Date:	1/24/2011
Demob Date:	2/1/2012	Completion Date:	2/1/2012
CERCLIS ID:	NCN000410653	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA-Emergency Assessment

1.1.2 Site Description

Biotech Industries is an active chemical distribution facility that provides and blends chemicals for pools, wood bleaching, textiles and other applications. The operation is housed in a 100,000 square foot building approximately 600 feet from Jacobs Fork Middle School and 1,000 feet from Fred T. Foard High School.

1.1.2.1 Location

Biotech Industries is located at 3561 Plateau Road, Newton, Catawba Country, NC28658.

1.1.2.2 Description of Threat

NC DENR requested EPA assistance after performing a routine inspection of Biotech Industries. EPA, DENR and START performed a walkthrough and assessment on 1/24/2011. EPA observed hundreds of drums in the warehouse section of the facility. Many drums were labeled corrosive, flammable, oxidizer, toxic, etc, some drums were unlabeled. A large number of drums were rusted, dented, punctured or otherwise compromised. EPA observed drums with material leaking onto the floor. Drums contained compounds such as sodium hydroxide, sodium hypochlorite, acetone and various alcohols. EPA observed a drum containing several buckets which contained mercury switches. Drums containing various chemicals were not segregated by hazard class with flammables being located directly next to oxidizers and corrosives. Due to the instability of the site (leaking drums, incompatible materials) and proximity to school, EPA initiated a Emergency Response Action.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA observed hundreds containing hazardous substances including flammables, oxidizers, toxics, etc. START performed air monitoring with at TVA-1000 and obtained PID reading of over 800 ppm when uncapping an unlabeled drum. EPA observed drums with a white crystallized substance covering the top and part of the side. Many drums are compromised in various ways and some are leaking onto the floor. One drum contains several buckets containing mercury switches.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

NC DENR requested EPA assistance after performing a routine inspection of Biotech Industries. EPA, DENR and START performed a walkthrough and assessment on 1/24/2011. EPA observed hundreds of drums in the warehouse section of the facility. Many drums were labeled corrosive, flammable, oxidizer, toxic, etc, some drums were unlabeled. A large number of drums were rusted, dented, punctured or

otherwise compromised. EPA observed drums with material leaking onto the floor. Drums contained compounds such as sodium hydroxide, sodium hypochlorite, acetone and various alcohols. EPA observed a drum containing several buckets which contained mercury switches. Drums containing various chemicals were not segregated by hazard class with flammables being located directly next to corrosives. The property is located within 1000 feet of a middle school and a high school. The property owner maintained that he received the material from various business and was paid for disposal. He claims that he intends to either sell or recycle the majority of the material and consolidate and dispose of the rest. Biotech Industries is the consolidation of S&W Chemicals and Catawba Chemicals, both of which were owned by the owner of Biotech.

EPA has activated US Coast Guard as OSC representatives. Two Coast Guardsmen are now on site and are actively coordinating site activities.

2.1.2 Response Actions to Date

EPA performed an assessment of the site and spoke with the owner regarding site stabilization.

Due to the instability of the site (leaking drums, incompatible materials) and proximity to school, EPA initiated a Emergency Response Action.

Southern Logistics has segregated most of the incompatible materials and contained all leaking and unstable drums. Drums have been moved to the following segregated staging areas. Caustics, acids, flammables, oxidizers and acids Southern Logistics has also removed several drums of various flammable compounds from a trailer adjoining the main Biotech warehouse. Several rusted and unstable drums of flammables were pumped into new drums and moved to the flammable staging area. Air monitoring indicated levels averaging 300 ppm during the transfer of the flammable material. All workers were in respiratory protection.

Due to high particulate levels in work areas the site warehouse has been upgraded to level C PPE. Engineering controls including sweeping and vacuuming dirt and opening doors to increase ventilation have been implemented. The engineering controls have successfully reduced the amount of visible particulates in work areas.

OTIE START has performed air monitoring daily throughout site stabilization activities. Air monitoring has included PID/FID, CO, LEL, H₂S, O₂, Cl₂ and various Drager tubes. No readings were obtained above TWA with the exception of brief elevated levels of CO while using a fork lift in a poorly ventilated area. An intrinsically safe fan was brought in from the local fire department to ventilate the area.

Due to high amounts of visible particulates OTIE-START collected air samples using SKC pumps and RCRA metals cartridges. The results were negative with the exception of very low levels of total chromium. The levels were below the RSL for trivalent chromium but slightly above the RSL for hexavalent chromium (chrome-6). START will run samples for chrome-6 next week in order to confirm that levels are below RSL. A minimum of level C PPE will be maintained until the analytical results are obtained. Southern Logistics finished segregating incompatible materials based upon labels and is currently securing remaining drums with loose bungs or missing lids.

On February 9, 2011 at approximately 1429 hours START detected spikes of Cl₂ while air monitoring using a Multi-Rae with Cl₂ sensor installed. Cl₂ spiked at around 7 ppm and averaged 2 ppm in the area of some recently sorted and exposed pool chemicals. All personnel in the area were in level C respiratory protection with organic vapor/chlorine gas cartridges. The source of the chlorine gas was discovered to be an open poly drum containing a small amount of solid partially submerged in liquid. The drum was emitting visible yellow-green chlorine gas. START observed Cl₂ concentration peaking at 20 ppm briefly while Southern Logistics placed a lid on the drum. After capping the drum START and Southern Logistics evacuated the area and ventilated with a fan. Levels fell to 0 ppm after the drum was closed and the area ventilated. Southern Logistics taped the lid closed and placed the drum outside at the rear of the building inside a locked chain link fence. START performed air monitoring outside in the vicinity of the drum and downwind along the property line. No readings were obtained over 0 ppm Cl₂. START will monitor the drum daily and Southern Logistics will formulate a plan to deal with the drum containing Cl₂ gas. All personnel entering the exclusion zone will be in level B until it can be confirmed that Cl₂ gas is no longer a threat.

On February 11, START received sampling results for chrome-6. Levels were well below the residential RSL with the highest hit being 0.0000258 mg/m³ and the RSL being .0001 mg/m³. No additional air sampling will be performed for metals.

On February 12, 2011 Southern Logistics set up a scrubber system to neutralize the Cl₂ gas in the drum by forcing it through a drum of 10% caustic solution. After the gas was neutralized the drum was pumped full of caustic solution. One more drum was found to contain low levels of Cl₂ gas, it was also neutralized by filling it with caustic solution. Cl₂ levels were below 1 ppm in the drums after neutralizing the Cl₂.

On February 14, 2011 START observed PID levels of over 100 ppm near the flammable storage pad, Southern Logistics identified a drum of tetrachloroethylene weeping from the base, Southern Logistics overpacked the drum without incident. Due to the release of Cl₂ gas and the poor condition of many of flammable drums and the amount of unknown substances the Coast Guard has decided that any further entries will be made in level B.

On February 17, 2011 Southern logistics identified and segregated by label the last of the drums in room 2. This should conclude the segregation and inventory phase, barring the event of finding more material or drums.

On February 18, 2011 Southern Logistics sampled drums containing flammable materials in room 3. Southern Logistics will hazcat and test bulk the samples on Feb. 19 in preparation for pumping and bulking the flammable materials in poly totes on Monday Feb. 21.

During the week of February 21 through February 25, 2011 Southern Logistics consolidated drums of flammable material in room three into totes based on hazard classes obtained by hazcat testing. The consolidation involved pumping several thousand gallons from individual drums using an intrinsically safe pump. START monitored the explosive atmosphere in the room while Southern Logistics pumped. LEL levels stayed at 0% for the duration of the pumping with the exception of a reading of 15%. Southern Logistics stopped pumping when the LEL was obtained and allowed the room to clear before continuing to pump. All pumping of flammable material was performed in level B PPE. Southern Logistics also opened, sampled and hazcated drums in the flammable storage area that they were previously unable to open due to rusted bungs. Other activities performed during this reporting period include sampling and hazcating of used oil drums and the transfer of solid oxidizers into cubic yard boxes.

February 23, 2011, START demobilized from the site for the remainder of the cleanup activities. Coast Guard personnel remained onsite to continue oversight of PRP contractors through May 2011.

During the week of February 28 through March 4, 2011 Southern Logistics consolidated drums of used oil into totes, segregated remaining drums based on hazard class, consolidated solid oxidizers into cubic yard boxes and sampled several drums labeled caustic for hazcating.

During the week of March 7 through March 11, 2011 Southern Logistics depacked drums of small containers for segregation. During this process a container of picric acid was discovered, it was stabilized in a water solution. Southern Logistics also sampled unknown small containers for hazcating. All sampling of unknown containers was performed in level B.

Southern Logistics continued sampling, hazcating, test bulking, and consolidating hazardous and nonhazardous waste through May. On May 23, 2011, START returned to the site to document hazardous waste shipments. The majority of hazardous waste was shipped to various waste disposal facilities as of May 25, 2011 with the exception of 39 drums of benzoyl chloride and several drums of glycol compounds. SLE began shipping nonhazardous waste on June 20, 2011. The benzoyl chloride was shipped on January 31, 2012. START confirmed the removal of the waste, concluding the removal activities.

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

Biotech Industries is the PRP. The president of Biotech signed an Access Agreement and Notice of Federal Interest. Biotech has agreed to fund the site stabilization activities and has contracted Southern Logistics to perform the work. The work will include properly containerizing all hazardous and non-hazardous materials which are in compromised containers based on visual inspection, segregating all materials based on compatibility and providing an inventory of all hazardous and non-hazardous materials on site. Biotech signed an Administrative Order on Consent agreeing to perform the work.

2.1.4 Progress Metrics

2.2 Planning Section

2.2.1 Anticipated Activities

No further activities are anticipated on at this site.

2.2.1.1 Planned Response Activities

No further activities are anticipated on at this site.

2.2.1.2 Next Steps

No further activities are anticipated on at this site.

2.2.2 Issues

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
TAT/START	\$10,000.00	\$0.00	\$10,000.00	100.00%
Intramural Costs				
Total Site Costs	\$10,000.00	\$0.00	\$10,000.00	100.00%

* 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

2.5.1 Safety Officer

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

3. Participating Entities

No information available at this time.

4. Personnel On Site

US EPA
NC DENR-RCRA
Catawba County Fire Marshal
Catawba County Emergency Management
START

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 #7 Last Updated 5/5/2016