

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #13
Progress
Welch Group Environmental (WGE) Belton
B4E7
Anderson, SC
Latitude: 34.4832610 Longitude: -82.5636790

To:
From: Greg Harper, OSC
Date: 5/4/2012
Reporting Period: 10/27/2011 through 04/30/2012

1. Introduction

1.1 Background

Site Number:	B4E7	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:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

1.1.2 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 ranges around the Southeast, brought back to their recovery operations at the Palmetto, Fair Play and Belton locations in South Carolina. WGE recovered, stored and melted the lead into ingots for recycling.

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 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 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. A Health and Safety Plan as well as Removal Action Workplans (RAWP) for the initial emergency response phase was submitted and approved by the OSC in consult with SCDHEC. The emergency response phase commenced on February 08, 2011.

The RSE Report was to be complete in March of 2011 with a subsequent recommendation for further action. The OSC coordinated enforcement activities with SCDHEC. In addition, the OSC coordinated with EPA R4 RCRA to assure WGE gun range recovery activities meet the applicable federal Resource Conservation and Recovery Act (RCRA) standards.

The PRP's contractor submitted the site RAWP on March 5, 2011 and after the OSC's review, the RAWP was approved on March 8, 2011. On March 14, 2011, WGE began decontaminating a piece of equipment primarily used to separate bullets from lead dust and range debris. The vibratory screen was decontaminated and cleared on March 17, 2011. WGE submitted a vibratory screen cross contamination plan detailing decontamination procedures after future use.

The Administrative Order on Consent ([AOC](#)) was finalized and transmitted on May 12, 2011.

On October 26, 2011, the EPA met on site with START and WGE. The meeting was scheduled in order to transfer OSC duties from OSC (Leo Francendese) to OSC (Greg Harper). WGE was informed of the change and any further site approvals will be reviewed by OSC Greg Harper.

1.1.2.1 Location

The site is located 5043 Belton Hwy in Anderson, South Carolina.

1.1.2.2 Description of Threat

Lead is present at high levels in either soils, sediments, uncontained vessels and drums, various equipment and on the building floors. These high levels exist at concentrations that are an imminent and substantial threat to public health or welfare.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

RSE was completed in March 2011 ([RSI Report](#)). See SCDHEC referral package at the documents section of for this site.

2. Current Activities

2.1 Operations Section

2.1.2 Response Actions to Date

During this reporting period WGE is working to decontaminate a box truck which they would like to use in their ongoing business operation. During this reporting period no other site activities were conducted; however WGE maintains the stability of the site and the security of the drummed waste in the buildings.

The only current work approved is for decontamination of select equipment and to maintain the security of the site and drummed waste. Future time critical response actions will commence once the RAWP and site specific Health and Safety Plan (HASP) is approved. All removal operations will be conducted in accordance with a site specific Health and Safety Plan.

2.2 Planning Section

2.2.1 Anticipated Activities

Because of the identification of high concentrations of lead dust, waste material, contaminated debris and soils removal actions will be conducted at the site. The removal actions will be conducted as part of a time critical removal action under the Administrative Order on Consent ([AOC](#)). As part of the AOC, the OSC requested that the PRP prepare the following plans for WGE Belton:

- **Waste Characterization Plan** (re. sampling) in order to gather the necessary information for an eventual **Disposal and Recycling Options Analysis**.
- **Decontamination and Demolition Plan** for remaining debris and structures exceeding the lead cleanup criteria.
- **Soils Removal and Disposal Plan** for soils exceeding the cleanup criteria.

On June 24, 2011 the OSC met in Atlanta with WGE to resolve outstanding RAWP issues. The meeting resulted in establishing timelines and deliverables for time critical removal action at the site ([EPA Memo 06-27-11](#)).

2.2.2 Issues

WGE is currently conducting the removal action at Fair Play location.

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

No information available at this time.

4. Personnel On Site

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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.