

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Liberty Fibers - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #17
Debris Removal Progress and Ceiling Increase
Liberty Fibers
B457
Morristown, TN
Latitude: 36.1493481 Longitude: -83.2048083

To:
From: Karen Buerki, On-Scene Coordinator
Date: 7/24/2013
Reporting Period: 6/9/2012 to 9/28/2012

1. Introduction

1.1 Background

Site Number:	B457	Contract Number:	EP-S4-07-02
D.O. Number:	0115 (Mod. 008)	Action Memo Date:	9/26/2012
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	4/21/2010	Start Date:	4/21/2010
Demob Date:		Completion Date:	
CERCLIS ID:	TNN000410507	RCRIS ID:	
ERNS No.:	NRC 937191	State Notification:	4/21/2010
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical Removal Action

The scope of work for this action is the removal of Asbestos-Containing Material (ACM) debris and deteriorated Thermal System Insulation (TSI), consolidation and disposal of containers of hazardous waste and hazardous materials, modification of the reservoir dam to prevent retention of more than 30 acre-feet of water, demolition of what remains of the Power House and disposal of the resulting ACM debris, and capping and closure of the Class III Landfill.

1.1.2 Site Description

The Liberty Fibers Site (Site) is approximately 230 acres of the American Enka/BASF Corporation textile plant located in the Lowland Community. It began manufacturing Rayon in 1947. It is bordered to the north by a Norfolk Southern railroad line and a small residential neighborhood; to the east by a landfill and a retention pond; to the south by the former Nylon Staple Plant; and to the west by Enka Highway and farmland. The topography of the Site is relatively flat. Drainage is to Flat Creek and the Nolichucky River.

1.1.2.1 Location

The Site is located at 4901 Enka Highway (State Route 160), Morristown, Hamblen County, Tennessee. The geographic coordinates for the Site are 36.15580 degrees north latitude and -83.20645 degrees west longitude.

1.1.2.2 Description of Threat

Exposure to friable asbestos is the primary threat. The Site is covered in piles of demolition debris interspersed with friable asbestos and has tens of thousands of linear feet of pipe wrapped in deteriorated asbestos-containing TSI throughout. The Site is not secure as evidenced by almost routine trespass. There are businesses operating in the buildings surrounding the Site and several residential properties adjacent to the Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

A Multimedia Inspection was conducted March 20-21, 2008. EPA inspected the Site again on December 3-4, 2009, and a Removal Site Evaluation was performed on January 18-22, 2010. On April 19, 2010, Hot Work (cutting torch) activities initiated a fire along the southern perimeter of the Site. EPA and The Morristown Fire Department responded. OSC Perry Gaughan requested that EPA Region 4 Technical Services Section evaluate asbestos sampling results from January 2010 to determine if a threat to human health and the environment exists on Site. OSC Perry Gaughan concluded that the threat exists, served

the owner with a Notice of Federal Interest, and initiated an emergency response action.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Removal of ACM debris and glove-bagging every 20 feet and plastic wrapping of the elevated pipe runs that are identified as asbestos-containing TSI continues. ACM debris in close proximity to basements is being pushed into the basements to minimize exposure in anticipation of a funding shortfall.

2.1.2 Response Actions to Date

During this period:

CMC moved the perimeter snow fence on the northeast side to encompass the overhead pipe rack leased by Mike Ball on June 14, 2012. Access was obtained by ERT's Greg Powell.
CMC continues to move ACM to the landfill and glove-bag deteriorated TSI
A fire occurred at the Alumasal, LLC, plant on June 15, 2012
START collected wastewater and sludge samples from on-site clarifiers on June 21, 2012
START collected sediment samples from NPDES Outfalls on June 27, 2012
START logged drums and containers in remaining structures on-site beginning July 10, 2012
START collected surface water samples at NPDES Outfalls on July 12, 2012
CMC began removing ACM from vegetated areas beginning with the northwestern portion of the Site
EPA meets on-site with TDEC, CMC, and Tetra-Tech to discuss the path forward on July 18, 2012
START began visual inspection and clearance of grids on July 30, 2012
ATMOS cut off gas service to Alumasal, LLC, due to delinquency on July 30, 2012
OSC Buerki provided a site tour to the Morristown Fire Department on-site July 31 and August 1, 2012
START collected bulk asbestos samples from the Alumasal, LLC, plant on August 14, 2012
CMC began ACM removal next to the partially demolished Rayon Filament plant on August 16, 2012
CMC began to remove ACM from trenches and shallow channels around foundations running throughout the Site on September 19, 2012
EPA approved a Ceiling Increase and Change in Scope Action Memo on September 26, 2012
CMC began removing accumulated ACM from basement structures on September 27, 2012

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

PRPs have been identified and enforcement is ongoing.

2.1.4 Progress Metrics

Note: Volumes or weights are estimates due to the nature of the material. The number of articulated dump loads of ACM transported to the landfill is tracked on a daily basis.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Asbestos-Containing Material (ACM)	Demolition Debris	3,750 loads	N/A	N/A	Class III Landfill On-Site
Bagged ACM (Electrical Equipment Building)	Friable asbestos insulation from previous abatement activity	20,258 bags	N/A	N/A	Class III Landfill On-Site
Glove-Bagged TSI	Overhead Pipe Runs	285 bags	N/A	N/A	Class III Landfill On-Site
<i>Recycleable</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Scrap Metal	Rebar and structural steel from demolition activity	451 loads			

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

ERRS will continue to wrap and glove bag TSI on the elevated pipe runs and prepare for removal.
ACM debris will be removed from below-grade basement structures and disposed of in the on-site landfill.
ACM debris on the surface and within the Rayon Filament warehouse will continue to be removed and disposed of in the on-site landfill.
Containers of hazardous materials will be staged, haz-catted, sampled, and disposed of off-site.
The reservoir dam will be modified to allow for no more than 30 acre-feet of water retention.

2.2.1.2 Next Steps

ERRS will explore cost savings through subcontracting glove-bag and abatement work.

Explore AOC options with adjacent property owners, Jolley-Rock, LLC, and Paint Oak, LLC.

2.2.2 Issues

There is a nest of an unidentified bird of prey on top of a portion of the Power House. Prior to demolition, not only will the City of Morristown need to condemn the remaining structure, but, the bird needs to be identified and the Migratory Bird Treaty Act applicability determined.

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

2.5.1 Safety Officer

OSC Karen Buerki (Lead) and OSC Terrence Byrd (Alternate)

2.6 Liaison Officer

N/A

2.7 Information Officer

N/A

2.7.1 Public Information Officer

N/A

2.7.2 Community Involvement Coordinator

Kyle Bryant

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

TDEC Department of Solid Waste, Knoxville Office, has been consulted on the design of the Class III on-site landfill.

4. Personnel On Site

As of September 28, 2012:

1 EPA OSC OSC Karen Buerki/OSC Terrence Byrd

1 EPA ERT Greg Powell

1 START Paul Prys or Bryan Erickson with Tetra Tech EM, Inc.

ERRS - CMC, Inc.

1 Project Manager

1 Field Clerk

9 Equipment Operators

1 Laborer

5. Definition of Terms

Asbestos - A generic name given to a number of naturally occurring hydrated mineral silicates that possess a unique crystalline structure, are incombustible in air, and separate into fibers. Asbestos includes asbestiform varieties of chrysotile (serpentine); crocidolite (riebeckite); amosite (cummingtonite-grunerite); anthophyllite; tremolite, and actinolite.

NESHAP - National Emission Standards for Hazardous Air Pollutants

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.