

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #19  
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:** 8/13/2012

**Reporting Period:** 01 July – 10 August 2012

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	B4F1	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	PRP Oversight
<b>Response Lead:</b>	PRP	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	1/31/2011	<b>Start Date:</b>	1/31/2011
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	1/31/2011
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 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

WGE continues to screen, decontaminated and remove the masonry block, scrap metals and plastic "Super Screws" from the contaminated area of the site. The decontaminated materials have been placed in a designated lay-down area in a clean portion of the property. WGE has moved three of the six box trailers from the contaminated area.

WGE continues to clean the content of the block building and trailer open to the building where the lead melting operation was located. The building and trailer contains approximately 500 boxes of plastic "Super Screws." WGS has removed and decontaminated approximately half of the boxes of "Super Screws".

WGE's industrial hygienist was on-site June 25 and collected a total of seven air samples; three worker exposure air samples, one air sample outside the building and three perimeter air samples. The three worker exposure air sample results were 0.30 mg/m<sup>3</sup>, 0.68 mg/m<sup>3</sup>, and 1.0 mg/m<sup>3</sup>, two of which exceeded the 8-hr TWA PEL and TLV of 0.05 mg/m<sup>3</sup>. However, the employees wore properly personal protection equipment including fitted full facepiece respirators. The air sample collected outside near the exhaust from the air machine was detected at 0.012 mg/m<sup>3</sup>. And the three perimeter air samples were below the PEL and TLV of 0.05 mg/m<sup>3</sup> and the action level of 0.03 mg/m<sup>3</sup>. The analytical results for the upwind, downwind, and crosswind sample locations at the perimeter of the control zone were less than 0.0033 mg/m<sup>3</sup> to less than 0.0034 mg/m<sup>3</sup> or below the detection limit for the sampling and analytical method.

WGE collected a waste sample from the drummed lead waste in the block building. The analytical results were lead of 2,720 mg/L and copper of 0.04 mg/L. WGE is working with their waste broker to schedule transportation of the drums and disposal in a hazardous waste disposal facility. WGE identified the Chemical Waste Management in Emelle, Alabama to receive hazardous waste from the site and EPA has approved it.

**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 begin the disposal of the drummed waste located in the block building. It is anticipated that WGE will collect a waste sample from the 30 yard roll-off box, PPE and cardboard and complete a waste profile of each for disposal.

WGE will submit the following plans before begin the building decontamination and/or building demolition and the soil excavation and removal phase of the site removal action.

- **Decontamination/Demolition Plan** for the structure 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
<b>Extramural Costs</b>				

START	\$45,761.00	\$28,637.00	\$17,124.00	37.42%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	\$45,761.00	\$28,637.00	\$17,124.00	37.42%

\* 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.