

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
US Finishing/Cone Mills - Removal Polrep
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #6
Final Polrep
US Finishing/Cone Mills

Greenville, SC
Latitude: 34.8846284 Longitude: -82.4263000

To:
From: Terry Tanner, OSC
Date: 9/21/2012
Reporting Period: 04/12/2012 through 09/21/2012

1. Introduction

1.1 Background

Site Number:	A4DD	Contract Number:	
D.O. Number:		Action Memo Date:	9/13/2011
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	NPL	Operable Unit:	
Mobilization Date:	8/9/2011	Start Date:	8/9/2011
Demob Date:	4/3/2012	Completion Date:	4/3/2012
CERCLIS ID:	SCD003358744	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Inactive Production Facility (former textile mill).

1.1.2 Site Description

The former US Finishing/Cone Mills site is located at 3555 Old Buncombe Road approximately 3 miles north of downtown Greenville, SC. This facility operated as a textile mill until November 2003 when the main plant was partially destroyed by fire. American Fast Print is the current property owner of a large portion of the 256 acre facility. In July 2004, Piper Properties purchased approximately 19 acres of the 256 acre property along a section of the Reedy River. The property associated with the site is currently in temporary receivership as part of a bankruptcy proceeding.

The US Finishing/Cone Mills site was referred to the Removal Program by the Remedial Program. For a chronological summary of environmental enforcement associated with this site please see the previous POLREPs.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

The fire which occurred in 2003 destroyed approximately 130,000 square feet of the 400,000 square foot factory and warehouse. Asbestos insulation was present throughout the debris associated with the damaged portion of the factory. WRSSCompass, the ERRS contractor for EPA, was tasked to segregate the debris so that the debris could be managed in a cost effective manner. The debris was segregated into three primary waste streams: asbestos wrapped pipping, steel beams, and miscellaneous debris.

Prior to commencement of removing the building damaged by the fire, a thorough walk through and evaluation of the building was conducted to confirm that the area was ready for commencement of the removal activities. Pre-Demolition Surveys were completed to identify potential waste streams and the surveys maintained on site.

In general, the tasks included a variety of procedures. The most important aspect in the development of these procedures was the safe conduct of the work. The warehouse, whose structural integrity was compromised by the fire, was condemned by the city. WRS' procedures limited the use of labor to the most controlled and safe conditions and relied upon mechanized means of removal wherever possible. 80,000 lb. excavators equipped with concrete breakers/processor, grapples, and other modern hydraulic demolition tools and attachments were utilized to remove and segregate the debris piles. Wherever possible, large structures were removed to ground level using mechanized means. Subsequent sizing of scrap materials such as steel and rebar and other material processing activities took place at grade level.

The steel beams and other ferrous metals were recycled at a local metal scrap yard. The miscellaneous debris which contained Presumed Asbestos Containing Material (PACM) associated with the roofing material and small pieces of asbestos not removed with the asbestos wrapped pipping, was loaded into 20 yard dump trucks and transported to two large waste cells on site. The two waste cells were previously selected for PACM waste disposal and designated as P-1 and P-2. A Closure Plan outlining the construction for the waste cells was generated prior to the work and a copy of the Closure Plan was submitted to the state.

Visible small of pieces asbestos were saturated with a wetting agent and then double bagged in asbestos labeled bags or wrapped in plastic and temporarily staged on site. This material was later combined with the asbestos material associated with the Power Plant building (see discussion below) and shipped to an off site landfill for disposal.

The former Power Plant building contained a high concentration of asbestos wrapped pipping. While the fire compromised the warehouse's ability to contain the asbestos, the structural integrity of the Power Plant was not compromised by the fire. Therefore an asbestos abatement was planned for the Power Plant building. An Asbestos abatement plan was completed by Soil & Material Engineers (S&ME) and submitted to SCDHEC for review and approval of an asbestos abatement action for the former Power Plant building. S&ME also performed the air monitoring and clearance monitoring during the abatement process. Following a competitive bidding process, Winter Environmental was hired to perform an asbestos abatement within the Power Plant building. The asbestos material removed during the abatement by Winter Environmental was combined with the asbestos material collected by WRSCompass and sent to a subtitle D regulated landfill for disposal.

Air quality during the removal action was monitored within the work zone (hot zone) and at the perimeter of the property. The perimeter air quality was monitored 24 hours a day for particulates by Ebam units surrounding the periphery of the site. This data was also supplemented through the collection of air samples collected during work hours and the samples submitted to the laboratory for asbestos and lead analysis. The results of the perimeter air monitoring indicated that OSHA action levels for particulates, lead and asbestos were not exceeded during the removal activities. Dust control during demolition activities were performed though spraying the work areas with water from fire suppression type spray hoses connected to water trucks. This dust control method was a key factor in keeping airborne dust that potentially contained asbestos below the action levels set for the site.

The qualitative data (particulates data) from the Ebam units was uplinked to the website at <http://usfinishing-conemills.com> for public viewing. Laboratory data for lead and asbestos analysis was also published on the website to provide qualitative data associated with the quantitative data collected from the Ebam units. This combined information provided the viewers with the volume of airborne particulates and the presence or absence of airborne lead and asbestos. Two web cameras were used to stream video of the removal activities to the website for public viewing.

The investigation derived waste left on site from previous investigations (27 count 55-gallon drums) was characterized for disposal purposes and shipped off site for disposal. Several small (5 through 20 gallon) plastic containers were present in buildings throughout the site. Several of these containers contained unknown liquid substances. These liquids were sampled for characterization and disposal purposes. Seven switches (metal housing units between 2-6 feet in length) containing mercury were discovered in the water treatment building. The mercury was collected from these units and shipped off site for recycling.

The WRSCompass crew pressure washed the concrete slab and the asphalt roadways. The grounds were seeded and covered with straw for erosion control purposes prior to demobilization.

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

EPA's cost recovery group is evaluating multiple PRPs associated with this site. They are also evaluating the status of the Cone Mills Corporation following their bankruptcy in addition to evaluating the existence of insurance policies during ownership and operations periods for the respective PRPs.

2.1.4 Progress Metrics

The asbestos associated with the asbestos wrapped pipping and the asbestos abatement was sent to both the Safeguard Landfill Management, 6895 Roosevelt Highway, Fairburn, GA., and the Palmetto Landfill & RC, 251 New Hope Road, Wellford, SC.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Scrap Iron		11,004 tons			Recycling

PACM debris		18,702 cubic yards			On-Site Waste Cell
Asbestos		51.15 tons	#1-#8	Bagged	Safeguard Landfill and Palmetto Landfill
Solids:non-haz		215 lbs			Palmetto Landfill
Liquid:non-haz		110 gallons		Solidified	Palmetto Landfill
Liquid:flammable		885 gallons		Fuel blend	EcoFlo, Greensboro, NC
Solid:non-haz		1840 pounds		None	Uwharrie, Mt. Gilead, NC
Liquid:non-haz		445 gallons		Solidified	Uwharrie, Mt. Gilead, NC
Liquid:Hg		20 pounds		Recycled	Ecoflo, Greensboro, NC

2.2 Planning Section

2.2.1 Anticipated Activities

EPA's remedial group is performing a remedial investigation on this site. Additional environmental response actions will be contingent upon the results of the remedial investigation.

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

2.2.2 Issues

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

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

[EPAOSC USFCM Webpage](#)
<http://www.usfinishing-conemills.com/>
<http://www.atsdr.cdc.gov/asbestos/>

6.2 Reporting Schedule

7. Situational Reference Materials

No information available at this time.