

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #18
ACM Debris Removal Continues
Liberty Fibers
B457
Morristown, TN
Latitude: 36.1493481 Longitude: -83.2048083

To:
From: Karen Buerki, On-Scene Coordinator
Date: 8/8/2013
Reporting Period: 9/29/12 to 12/31/12

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 throughout the Site and within the partially demolished Rayon Filament Warehouse that are identified as asbestos-containing TSI continues. An asbestos abatement subcontractor was hired to supplement CMC's work on the elevated pipe runs.

2.1.2 Response Actions to Date

During this period:

CMC resumed moving ACM from basement sub-structures to the landfill.

START collected accumulated groundwater samples from on-site basement sub-structures on October 12, 2012.

START completed mapping of property boundaries for Lowland Industrial Complex, LLC, according to the survey description in the property deed. Some overhead pipe encased in deteriorated TSI on the south side of the Site was discovered to be outside the previously recognized property boundary.

CMC deconned drums and containers and staged them outside the asbestos exclusion zone for sampling and bulking activities.

CMC continued removing ACM from vegetated areas of the Site. START continued visual inspection and clearance of grids.

START sampled visually stained soil for PCBs in Grid H-7.

CMC began ACM and debris removal within the partially demolished Rayon Filament Warehouse on November 7, 2012.

CMC's asbestos abatement subcontractor began glovebag work in the partially demolished Rayon Filament Warehouse on November 28, 2012.

CMC continued removal ACM from trenches and shallow channels around foundations. Removal of debris from basement sub-structures limited to material above the groundwater level on December 20, 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	6,019 loads	N/A	N/A	Class III Landfill On-Site
Bagged ACM (Electrical Equipment Building)	Friable asbestos insulation from previous abatement activity	20,520 bags	N/A	N/A	Class III Landfill On-Site
Glove-Bagged TSI CMC	Overhead Pipe Runs	289 bags	N/A	N/A	Class III Landfill On-Site
Glove-Bagged TSI NEO Corporation	Overhead Pipe Runs	718 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	636 loads			Recycle Tennessee Metals Company

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

ERRS' asbestos abatement subcontractor will continue to wrap and glove bag TSI on the elevated pipe runs.

ACM debris will continue to be removed from below-grade basement structures and disposed of in the on-

site landfill.

ACM debris on the surface and within the partially demolished Rayon Filament Warehouse will continue to be removed and disposed of in the on-site landfill.

TSI will be removed from the afterburner.

Containers of hazardous materials will be staged, haz-catted, sampled, and disposed of off-site.

The partially demolished Power House will be demolished and ACM disposed of in the on-site landfill.

The reservoir dam will be modified to allow for no more than 30 acre-feet of water retention.

The natural gas pipeline will be restored.

The on-site landfill will be capped and a vegetative cover established.

2.2.1.2 Next Steps

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 December 31, 2012:

1 EPA OSC Karen Buerki

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

NEO Corporation

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.