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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Region IV

Subject: POLREP #19

ACM Debris Removal Continues

Liberty Fibers B457

Morristown, TN

Latitude: 36.1493481 Longitude: -83.2048083

To:

From: Karen Buerki, On-Scene Coordinator

Date: 9/26/2013

Reporting Period: 1/01/2013 - 3/31/2013

1. Introduction

1.1 Background

Site Number:B457Contract Number:EP-S4-07-02D.O. Number:0115 (Mod. 009)Action Memo Date:9/26/2012Response Authority:CERCLAResponse Type:Time-CriticalResponse Lead:EPAIncident 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.

The Site was demobed for the Easter Holiday. There is also a lack of funding due to the budget sequestration.

2.1.2 Response Actions to Date

During this period:

CMC continued removal of ACM from basement sub-structures to the landfill.

CMC began cutting segregated rebar pile for recycling.

CMC's asbestos abatement subcontractor began erecting scaffolding around the afterburner in preparation for gross removal of deteriorated TSI from the afterburner on January 22, 2013. Gross removal began on February 7 and was completed on February 14, 2013.

START continued visual inspection and clearance of grids.

CMC began removing partially demolished portions of the Rayon Filament Warehouse, mostly consisting of detached steel beams and other structural members on January 31, 2013.

CMC began removal of 20 foot sections of overhead pipe bearing TSI on February 12 and completed removal on March 27, 2013.

CMC continued removal ACM from trenches and shallow channels around foundations.

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 natue of the material. The number of articulated dump loads of ACM transported to the landfill is tracked on a daily basis.

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Asbestos-Containing Material (ACM)	Demolition Debris	6,782 loads	N/A	N/A	Class III Landfill On-Site
Bagged ACM (Electrial 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	304 bags	N/A	N/A	Class III Landfill On-Site
Glove-Bagged TSI NEO Corporation	Overhead Pipe Runs	3,340 bags	N/A	N/A	Class III Landfill On-Site
TSI Pipe Removed	Overhead Pipe Runs	26,402 lf	N/A	N/A	Class III Landfill On-Site
Recycleable	Medium	Quantity	Manifest #	Treatment	Disposal
Scrap Metal	Rebar and structural steel from demolition activity	757.88 Gross Tons			Recycle Tennessee Metals Company

2.2 Planning Section

2.2.1 Anticipated Activities

Secure funding from current Action Memo to complete Removal Action.

The Budget Control Act of 2011 mandated automatic budget cuts in 2013 which have led to administrative furloughs. Funding is questionable moving forward.

2.2.1.1 Planned Response Activities

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

Complete removal of ACM from warehouse downspouts.

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)

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 or Dave Mickunas
- 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.