

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Rownd & Sons, Inc - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #3
Removal Activities Continue Through Shutdown
Rownd & Sons, Inc
B4W8
Dillon, SC
Latitude: 34.4253620 Longitude: -79.3699830

To: Jim Webster, USEPA R4 ERRB

From: Chuck Berry, On-Scene Coordinator

Date: 10/24/2013

Reporting Period: 9/17/2013 - 10/11/2013

1. Introduction

1.1 Background

Site Number:	B4W8	Contract Number:	
D.O. Number:		Action Memo Date:	7/24/2013
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	9/16/2013	Start Date:	8/28/2012
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Inactive Production Facility

1.1.2 Site Description

1.1.2.1 Location

The Rownd And Sons Site (the "Site") is located at 800 Martin Luther King Jr Boulevard, Dillon, South Carolina. The property is approximately 9.5 acres and consists of 4-5 buildings. The site is surrounded by a mix of residential and commercial (mainly restaurants) properties.

1.1.2.2 Description of Threat

Rownd and Sons manufactured wooden baskets and veneer. The plant closed in 2001. At that time, the power company disconnected the power, and vandals and copper thieves broke into the facility. Eventually, a 529-gallon transformer containing PCB oil was broken open, releasing its entire contents onto the ground. Additionally, the buildings are in an advanced state of disrepair, and portions have already collapsed. The main building is laced with asbestos piping, much of which is already damaged and releasing fibers into the environment through the open bay door, missing siding panels, and collapsed portions of the structure.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Under a Brownfields grant from the South Carolina Department of Health and Environmental Control (DHEC), the City of Dillon hired S&ME to perform a Phase I Environmental Site Assessment (ESA) of the property in September 2006. During the assessment, S&ME identified multiple recognized environmental conditions (REC) regarding the Site.

Also under the Brownfields grant, in September 2007, Midlands conducted a Tier 1 Assessment on the UST. Their findings confirmed petroleum constituents (benzene, ethylbenzene, toluene, methyl tert-butyl ether [MTBE], and naphthalene) at levels above the South Carolina Risk-Based Screening Levels (RBSL) in both the soil and groundwater and lead levels above the RBSLs in the groundwater.

DHEC produced a Phase II ESA Report in July 2012, which verified most of the Phase I findings, except noting that many of the ASTs had been taken out of service and were stacked in a pile on-site. The 15,000-gallon tank remained, however.

DHEC collected soil, sediment, and groundwater samples over three separate sampling events to identify, quantify, and delineate the contamination on-site. Their sampling identified low levels of several contaminants at levels equal to or greater than the EPA Region 4 Regional Screening Levels (RSL) for residential soils. These contaminants include polynuclear aromatic hydrocarbons (PAH), hexachlorobenzene, 1,2,4,5-tetrachlorobenzene, arsenic, and vanadium. However, none of these constituents exceeded the Region 4 Removal Management Levels (RML). DHEC identified only one constituent that exceeded the RML: the PCB Aroclor 1260.

DHEC found only one location where the RML for Aroclor 1260 in industrial soil, 74 milligrams per kilogram (mg/kg), was exceeded. This was where the oil leaked from the Pyranol transformer east of the assembly building. PCB levels here were noted as high as 22,000 mg/kg; over 2% by weight. DHEC delineated an area approximately 1,720 square feet at the surface and extending for at least eight feet below ground surface (bgs). DHEC also determined that the plume migrated beneath the Assembly building. It is unknown how far the plume extends under the building.

Although at least three other large areas were identified as having detectable Aroclor 1260, and there are detectable levels of it spread throughout much of the Site (in oily sludge in the materials building, in the northwest corner of the Site, and in the sediment in the drainage swales along MLK Boulevard), all of these levels fall below the RML for Aroclor 1260 in industrial soil. In response to the discovery of large amounts of PCBs above the Toxic Substances Control Act (TSCA) and the Region 4 RMLs, DHEC requested assistance from the EPA Region 4 Emergency Response and Removal Branch (ERRB) to perform a removal site evaluation (RSE) for a potential time-critical removal action at the Site.

On August 28, 2012, the EPA On-Scene Coordinator (OSC) Jeffery Crowley mobilized to the Site with the Superfund Technical Assessment and Response Team (START) contractor Oneida Total Integrated Enterprise (OTIE) to perform a RSE. However, once on the Site, OSC Crowley initiated an emergency response action to secure and stabilize the abandoned containerized waste and cordon off the PCB-impacted soil with a temporary fence. An emergency Action Memorandum was prepared documenting a \$250,000 site ceiling. Emergency and Rapid Response Services (ERRS) contractor, Environmental Restoration (ER), mobilized to the Site and began the task of rounding up the drums, barrels, transformers, and other oil-filled equipment throughout the Site. Also present were boxes of asbestos insulation and pipe wrapping, much of which was unused and still in its original containers, although weather had damaged the containers beyond use. The City of Dillon assisted by cutting the brush off most of the Site to provide access around the Site as well as to reveal additional hidden equipment. To further secure the site, ER subcontracted for a fence to be installed around the PCB-impacted soil, and the containers were stored inside the building prior to demobilization.

After stabilization efforts were completed, OTIE began RSE activities. OTIE collected a total of 29 samples: 21 bulk asbestos samples, 6 soil samples, and 2 samples of waste oil. The 21 asbestos samples were analyzed using polarized light microscopy at EMLab P&K in Knoxville, Tennessee. Of the 21 submitted samples, eight tested positive for asbestos, with percentages ranging from 20 - 90%. Areas that were positive included various pipe wrapping and insulation, wall insulation, transit pipe, and pipe gaskets. Items that tested non-detect were the boiler insulation and furnace materials such as the fire doors, brick, and mortar.

Of the six soil samples, all showed positive detections for Aroclor 1260. Five of the six showed detections were less than 3 mg/kg, but the sample collected near the Pyranol transformer revealed a soil concentration of 12,000 mg/kg of Aroclor 1260. These results confirm DHEC's findings of generally low-level PCB contamination throughout the Site but extremely high levels neared the damaged Pyranol transformer. The waste oil samples also showed PCB concentrations of Aroclor 1260, although at low levels. A sample of one of the pad-mounted transformers detected 11 mg/kg and a sample of one of the oil circuit breakers was 1.9 mg/kg. This is probably due to either the equipment having originally been filled with PCB oil and then retro filled with non-PCB oil or from servicing by contractors with PCB residue in their equipment.

Approximately 75 containers of material were collected by ERRS. START performed hazard categorization testing on 24 of them before demobilizing. Of the 24 tested, two showed potentially hazardous characteristics as defined at 40 CFR 261 Subpart C. One drum tested positive for chlorine, indicating potential PCB and another drum has a pH of less than two. The remaining drums should be field tested and grouped, with all groups then being sampled for analysis at a laboratory to determine if additional hazardous constituents not identifiable in field testing are present.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Time-Critical removal actions were initiated on September 16, 2013.

2.1.2 Response Actions to Date

During this reporting period the following activities were completed:

- ERRS removed asbestos-covered debris from the main building, wrapped it, and containerized it in sealed roll-offs.
- An asbestos abatement crew removed the asbestos piping and pipe wrap from the main building, as well as the asbestos insulation from one of the outside boilers. Contrary to the explicit instructions of the OSC and the ERRS RM, the abatement crew entered the collapsed portion of the building and removed the one asbestos pipe that penetrated this area. Though unsafe and not authorized, the removal of the pipe did negate the need to demolish this section of the building and dispose of the material as asbestos-impacted debris. It is believed a language barrier prevented the instruction to not enter this portion of the building from being transmitted from the abatement company owner to

- the crew.
- ERRS attempted to separate several dozen valves and piping sections with asbestos gaskets between the pieces. About half were unable to be separated, and EPA was forced to dispose of the entire piece of metal. For those that separated, ERRS scraped the asbestos gaskets from the valves and sent the metal to a recycling facility.
- EPA and START went through the collected small containers and bulked the majority of the material into a tote as an oil/water mixture. This will be used during excavation on the PCB-contaminated soil for dust control. The remaining small containers were segregated and bulked/packaged for disposal.
- ERRS and START drained the oil from all of the oil-filled electrical equipment. START performed field testing for PCB content on each individual container's oil, finding no oil containing greater than 50 ppm of PCBs. The oils were then bulked together and sampled for disposal profiling. The laboratory results confirmed the field assay findings, and the oil will be disposal of as non-PCB-containing oil. The equipment hulls were sent to a recycling facility.
- EPA brokered a deal with the landowner, the City of Dillon, and Dillon County to facilitate the demolition and disposal of the secondary building in order to facilitate removal of the PCB contamination underneath. Although the concrete foundation provides a perfect cap for the contamination beneath, any future use of the property would be limited by a deed restriction requiring the owner to maintain this cap or remove and dispose of the contaminated soil beneath. Discussions with the City and County indicated they would like the property returned to beneficial use as a functioning industrial property at some point, and they agreed to remove the building and dispose of it at the County landfill at no cost to the property owner if EPA would remove the contamination beneath. This option is more protective of human health and the environment than the OSC's original plan to leave the building and remove the soil from around it, and the removal of the building at no cost makes it viable under the same site action memo ceiling. EPA agreed to remove the additional soil.
- START collected soil samples from beneath the slab for extent of contamination delineation. START also collected a disposal profile sample for the PCB-contaminated soil.
- START collected perimeter and personnel air samples during the asbestos-debris management and perimeter samples during the abatement. Results show all fiber counts at the perimeter to be below applicable regulatory standards.
- Overnight/weekend security continued to guard and protect the site during non-business hours.
- Due to the new volume of soil slated for disposal, site costs have increased slightly, but still fall within the OSCs original cost estimate. However, due to the government shutdown, no additional funding could be allocated to the ERRS Task Order. The site was demobilized and shut down until such a transfer could be made. The contaminated soil remains either beneath the concrete foundation or behind a temporary fence for security during the hiatus.

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

The owner of the property has been identified as Harry Rownd of Dillon, SC. The owner has been investigated and been found unable to pay for the removal action.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Quantity</i>	<i>Treatment</i>	<i>Disposal</i>
Scrap metal	24 tons	Recycling	Omni Source 2460 Cox Rd Lumberton, NC 28360

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

The following activities are planned for the next operational period:

- EPA, ERRS, and START will remobilize to the site on November 11, 2013.
- ERRS will remove the concrete cap and pressure wash the underside to remove any PCB contamination.
- START will take wipe samples of the concrete in accordance with TSCA disposal requirements.
- ERRS will excavate the PCB-contaminated soil to a maximum of 4 feet below grade.
- ERRS will load out the PCB-contaminated soil in trucks for transportation to EQ in Michigan.
- ERRS will backfill the excavation.

2.2.1.2 Next Steps

- Remobilization
- Excavation
- Restoration

2.2.2 Issues

The OSC is currently awaiting additional funding (within the already-approved site ceiling) for the ERRS Task Order.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$400,000.00	\$366,000.00	\$34,000.00	8.50%
TAT/START	\$100,000.00	\$51,000.00	\$49,000.00	49.00%
Intramural Costs				
USEPA - Direct	\$25,000.00	\$15,000.00	\$10,000.00	40.00%
Total Site Costs				
	\$525,000.00	\$432,000.00	\$93,000.00	17.71%

* 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

City of Dillon
Dillon County
South Carolina Department of Environmental Control
US EPA

4. Personnel On Site

Maximum Personnel On-Site during this reporting period:

1 USEPA OSC
1 START (Otie)
7 ERRS (ER)

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.