

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #22
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: 10/31/2013

Reporting Period: May 1, 2013 through October 31, 2013

1. Introduction

1.1 Background

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

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 completed screening, decontaminating and removed the 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. The trailer open to the block building where the lead melting operation was located has been cleaned and will be moved out of the contaminated area along with the conex box. WGE has prepared 48 drums of lead contaminated waste, placed them onto pallets and shipped them off-site for disposal. WGE has removed all the content from the pole shed on the site. WGE collected a waste sample from the drummed lead waste. The analytical results were lead of 2,720 mg/L and copper of 0.04 mg/L. WGE continues to decontaminate the on-site block building. First by using a pneumatic nettle chisel to remove lead splatter from the concrete block caused by the lead melting operation conducted inside of the building. It has generated additional lead waste which has been drummed and prepared for shipment off-site for disposal. After the gross lead contamination was removed from the block walls, WGE used a dilute muriatic acid rinse to remove the remaining lead dust from the concrete blocks inside the building. The dilute muriatic acid is collected and reused or stored for disposal.

- In October 2012, 20-55 gallon drums of lead contaminated waste were transported off site and received by Chemical Waste Management in Emelle, AL.
- January 17, 2013, 11 cubic yard boxes of lead contaminated waste were transported off site and received by Chemical Waste Management in Emelle, AL on January 18, 2013.
- During the week of April 15, 2013, WGE collected XRF soil samples from grid AF-7, an area south of the block building outside the previously sampled areas. WGE identified an area approximately 20 feet by 30 feet with lead contaminated soils. The area was excavated and the contaminated soil was stockpiled near the block building and will be addressed during the soil clean-up phase of the project.
- April 22, 2013, 24 -55 gallon drums of lead waste and 10 cubic yard boxes of lead contaminated items were transported off site and were received by Chemical Waste Management at Emelle, AL for disposal on April 23, 2013.
- WGE has transferred the lead waste from drums that were in poor condition into new drums that can be shipped off site for disposal.
- On September 30, 2013, 26 cubic yard boxes of cubic yard boxes of lead contaminated waste were transported off site and received by Chemical Waste Management in Emelle, AL on October 1, 2013.

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. WGE will ship the remaining drums of lead waste off site to Chemical Waste Management in Emelle, AL. WGE is working to identify a disposal facility for the oily water and oily waste drums originally located in the block building. In addition to the drummed waste, WGE has a thirty yard roll-off of miscellaneous waste (wood, plastic, block and glass). The roll-off box has been sampled and WGE is awaiting disposal at Chemical Waste Management in Emelle, AL.

After the drums of waste are transported off site for disposal, WGE will ship the 30 yard roll-off box.

WGE will complete the decontamination of the block building where WGE melted the lead.

WGE will submit a plan for the soil excavation and removal phase of the site removal action before begin the soil excavation phase of the removal action.

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
Extramural Costs				
START	\$45,761.00	\$30,504.45	\$15,256.55	33.34%
Intramural Costs				
Total Site Costs	\$45,761.00	\$30,504.45	\$15,256.55	33.34%

* 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 – 3
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.