

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #15
Welch Group Environmental (WGE) Belton
B4E7
Anderson, SC
Latitude: 34.4832610 Longitude: -82.5636790

To: Jim Webster, USEPA R4 ERRB
Paul Lee, DHEC

From: Greg Harper, OSC

Date: 10/31/2013

Reporting Period: November 17, 2012 through October 31, 2013

1. Introduction

1.1 Background

Site Number:	B4E7	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:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

1.1.2 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 ranges around the Southeast, brought back to their recovery operations at the Palmetto, Fair Play and Belton locations in South Carolina. WGE recovered, stored and melted the lead into ingots for recycling.

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 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 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. A Health and Safety Plan as well as Removal Action Workplans (RAWP) for the initial emergency response phase was submitted and approved by the OSC in consult with SCDHEC. The emergency response phase commenced on February 08, 2011.

The RSE Report was to be complete in March of 2011 with a subsequent recommendation for further action. The OSC coordinated enforcement activities with SCDHEC. In addition, the OSC coordinated with EPA R4 RCRA to assure WGE gun range recovery activities meet the applicable federal Resource Conservation and

Recovery Act (RCRA) standards.

The PRP's contractor submitted the site RAWP on March 5, 2011 and after the OSC's review, the RAWP was approved on March 8, 2011. On March 14, 2011, WGE began decontaminating a piece of equipment primarily used to separate bullets from lead dust and range debris. The vibratory screen was decontaminated and cleared on March 17, 2011. WGE submitted a vibratory screen cross contamination plan detailing decontamination procedures after future use.

The Administrative Order on Consent ([AOC](#)) was finalized and transmitted on May 12, 2011.

On October 26, 2011, the EPA met on site with START and WGE. The meeting was scheduled in order to transfer OSC duties from OSC (Leo Francendese) to OSC (Greg Harper). WGE was informed of the change and any further site approvals will be reviewed by OSC Greg Harper.

1.1.2.1 Location

The site is located 5043 Belton Hwy in Anderson, South Carolina.

1.1.2.2 Description of Threat

Lead is present at high levels in either soils, sediments, uncontained vessels and drums, various equipment and on the building floors. These high levels exist at concentrations that are an imminent and substantial threat to public health or welfare.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

RSE was completed in March 2011 ([RSI Report](#)). See SCDHEC referral package at the documents section of for this site.

2. Current Activities

2.1 Operations Section

2.1.2 Response Actions to Date

The only approved work was to decontamination of select equipment with approval from the EPA OSC and to maintain the security of the site and of drummed waste. Future time critical response actions will commence after the WGE Fair Play removal action, the Removal Action Work Plan (RAWP) for the Belton Site and Site Specific Health and Safety Plan (HASP) for the Belton Site are completed and approved by the OSC.

During the initial investigation high concentrations of lead dust, waste material, contaminated debris and soils were identified and removal actions will be conducted at the site. The removal actions will be conducted as part of a time critical removal action under the Administrative Order on Consent ([AOC](#)). As part of the AOC, the OSC requested that the PRP prepare the following plans for WGE Belton:

- **Waste Characterization Plan** in order to gather the necessary information for an eventual disposal and recycling options.
- **Decontamination and Demolition Plan** for remaining debris and structures exceeding the lead cleanup criteria.
- **Soils Removal and Disposal Plan** for soils exceeding the cleanup criteria.

On June 24, 2011 the OSC met in Atlanta with WGE to resolve outstanding RAWP issues. The meeting resulted in establishing a timeline and deliverables for time critical removal action at the site which included the cleanup of the other two sites: WGE Palmetto Parkway and WGE Fair Play.

WGE has moved the drums containing lead waste inside the building and the building was secured. A silt fence was constructed during the emergency response action that was conducted in the January 2011. Selected items needed by WGE to operate their ongoing business have been decontaminated and removed from the property.

2.2 Planning Section

2.2.1 Anticipated Activities

During this reporting period no clean-up activities were conducted, WGE is currently conducting a removal action at another site (WGE Fair Play). However WGE maintains the security of the site and the stability of the drummed waste in the buildings. The only approved work would be to decontamination of select equipment with approval from the EPA OSC and to maintain the security of the site and drummed waste. Future time critical response actions will commence after the WGE Fair Play removal action, the Removal Action Work Plan (RAWP) for the Belton Site and Site Specific Health and Safety Plan (HASP) for the Belton Site are completed and approved by the OSC. All removal operations will be conducted in accordance with a RAWP and HASP.

It is anticipated WGE will complete work at the WGE Fair Play site this winter and begin to prepare the RAWP and HASP. Removal operations at the WGE Belton site are anticipated to begin in the spring of 2013. The removal actions will be conducted as part of a time critical removal action under the Administrative Order on Consent ([AOC](#)). As part of the AOC, the OSC requested that the PRP prepare the following plans for WGE Belton:

- **Waste Characterization Plan** in order to gather the necessary information for an eventual disposal and recycling options for the lead waste on site.
- **Decontamination and Demolition Plan** for remaining debris and structures exceeding the lead

cleanup criteria.

- ***Soils Removal and Disposal Plan*** for soils exceeding the cleanup criteria.

2.2.2 Issues

WGE is currently conducting the removal action at Fair Play location.

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

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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.

POLREP #15 Last Updated 6/6/2016