

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #20
Removal of Thermal System Insulation from Warehouse and T&D of Drummed Waste
Liberty Fibers
B457
Morristown, TN
Latitude: 36.1493481 Longitude: -83.2048083

To:
From: Karen Buerki, On-Scene Coordinator
Date: 10/31/2013
Reporting Period: 4/01/13 to 6/30/13

1. Introduction

1.1 Background

Site Number:	B457	Contract Number:	EP-S4-07-02
D.O. Number:	0115 (Mod. 011)	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 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 continues. Removal of TSI within the partially demolished Rayon Filament Warehouse continues. Containers of hazardous waste and hazardous materials are being hazcatted, bulked, and sampled for disposal.

The Site was demobed on March 28, 2013, due to the budget sequestration. Site activities resumed on May 6, after funding was secured. The Site was demobed for the Memorial Day Holiday.

2.1.2 Response Actions to Date

During this period:

CMC began removing overhead pipes wrapped in TSI from the Rayon Filament Warehouse. Removal of the pipes was completed on June 28, 2013.

CMC's asbestos abatement subcontractor performed glovebag removal of TSI from warehouse downspouts and completed it on May 23, 2013.

CMC provided hazard categorization and bulking of over 300 staged drums and containers. CMC provided disposal, recycling, or reuse of twenty-one refrigerant cylinders, damaged lead acid batteries, a drum of a hydrofluoric acid solution, a drum of potassium persulfate, three drums of sodium hydroxide, and numerous other drummed waste, a pallet of PCB ballasts, and a roll-off box of hazardous solids.

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

CMC continued scraping surface soil to remove residual ACM.

CMC continued decon and recycling of scrap metal.

Lynne McCoy with Wildlife Rehabilitation was on-site June 19, 2013, to identify the bird of prey nesting on a structure next to the Power House. She identified it as an Osprey.

TetraTech continued visual inspection and clearance of grids. TetraTech also continued to provide perimeter air sampling and Site documentation.

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	6,862 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	304 bags	N/A	N/A	Class III Landfill On-Site
Glove-Bagged TSI NEO Corporation	Overhead Pipe Runs	3,382 bags	N/A	N/A	Class III Landfill On-Site
TSI Pipe Removed	Overhead Pipe Runs	37,308 lf	N/A	N/A	Class III Landfill On-Site
Tires	Solid		N/A		Class III Landfill On-Site
PCB Ballast	Fluorescent Lighting	788 lbs	0110488627JJK	Landfill	Lamp Environmental Industries (LEI), Inc. - Hammond, LA
Hazardous Waste, NOS	Solid	16,165 lbs	011147706JJK	Landfill	American Environmental Services, Inc. Calvert City,

					KY
Hazardous Waste, Acidic	Liquid	4 drums	011147721JJK	Neutralization	American Environmental Services, Inc. Calvert City, KY
Hazardous Waste, Basic	Liquid	3 drums	011147721JJK	Neutralization	American Environmental Services, Inc. Calvert City, KY
Hazardous Waste, Oxidizer	Solid	1 drum	011147721JJK		American Environmental Services, Inc. Calvert City, KY
Recycleable	Medium	Quantity	Manifest #	Treatment	Disposal
Scrap Metal	Rebar and structural steel from demolition activity	797.75 gross tons			Recycle Tennessee Metals Company
Refrigerant	Compressed Gas Cylinders				
Used Oil	Liquid	1 tote	011147720JJK		American Environmental Services, Inc. Calvert City, KY

2.2 Planning Section

2.2.1 Anticipated Activities

The Budget Control Act of 2011 mandated automatic budget cuts in 2013 which led to administrative furloughs.

2.2.1.1 Planned Response Activities

Complete disposal of containers of hazardous materials.
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

The Osprey chicks will have to leave the nest prior to commencing demolition of the Power House and the City of Morristown will need to condemn the remaining Power House structure.

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 June 30, 2013:

- 1 EPA OSC Karen Buerki
- 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.