

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #21  
Removal of ACM from Power House  
Liberty Fibers  
B457  
Morristown, TN  
Latitude: 36.1493481 Longitude: -83.2048083

**To:**  
**From:** Karen Buerki, On-Scene Coordinator  
**Date:** 11/6/2013  
**Reporting Period:** 7/01/2013 to 9/30/2013

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	B457	<b>Contract Number:</b>	EP-S4-07-02
<b>D.O. Number:</b>	0115 (Mod. 015)	<b>Action Memo Date:</b>	9/26/2012
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	4/21/2010	<b>Start Date:</b>	4/21/2010
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	TNN000410507	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>	NRC 937191	<b>State Notification:</b>	4/21/2010
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 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 with the focus now on the partially-demolished Power House. Remaining hazardous materials are being prepared for disposal.

The Site was demobed for the Independence Day Holiday and the Labor Day Holiday in this reporting period.

#### 2.1.2 Response Actions to Date

During this period:

- CMC provided transportation and disposal of hazardous substances, pollutants or contaminants left in abandoned containers on-site.
- 9/30/2013 - CMC completed disposal, recycling, or reuse of compressed gas cylinders including hydrogen and trichlorofluoromethane, a roll-off box of RCRA empty containers, a roll-off box of silica, talc, and other spent products, a roll-off box of caustic solids (sodium hydroxide), universal waste fluorescent bulbs, and a pallet of damaged lead acid batteries from a forklift battery.
- July 10, 2013 - EPA received a letter dated July 10, 2013, from the City of Morristown Chief Building Official condemning the Power House and northeastern portion of the Rayon Filament Warehouse.
- CMC began demolition of the remaining Power House structure. ACM was disposed of in the Class III landfill on-site and scrap metal was deconned and recycled.
- CMC had completed removing overhead pipes wrapped in TSI from the Rayon Filament Warehouse. Additional removal of TSI had to be conducted on or about August 26 and September 13, 2013.
- CMC continued removal of ACM from trenches and shallow channels associated with the Power House.
- CMC continued scraping surface soil to remove residual ACM.
- 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. Notice Letters were mailed to Jolley Rock Investments, LLC, and Paint Oak, LLC, on September 25, 2013.

#### 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	7,313 loads	N/A	Landfill	Class III Landfill On-Site
Bagged ACM (Electrical Equipment Building)	Friable asbestos insulation from previous abatement activity	20,561 bags	N/A	Landfill	Class III Landfill On-Site
Glove-Bagged TSI CMC	Overhead Pipe Runs	304 bags	N/A	Landfill	Class III Landfill On-Site
Glove-Bagged TSI NEO Corporation	Overhead Pipe Runs	4,201 bags	N/A	Landfill	Class III Landfill On-Site
TSI Pipe Removed	Overhead Pipe Runs	37,508 lf	N/A	Landfill	Class III Landfill On-Site

Tires	Solid		N/A	Landfill	Class III Landfill On-Site
PCB Ballast	Solid	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
Compressed Gas Cylinders	Gas	32 cylinders	010659334JJK		Tradebe Treatment and Recycling, LLC East Chicago, IN
RCRA Empty Drums	Solid	18 tons	1028439	Landfill	Carter Valley Landfill Church Hill, TN
Talc and silica powders and unused products	Solid	18 tons	1297220	Landfill	Carter Valley Landfill Church Hill, TN
Caustic Solids (Sodium Hydroxide)	Solid	12 tons	00001	Landfill	American Environmental Services, Inc. Calvert City, KY
<b>Recycleable</b>	<b>Medium</b>	<b>Quantity</b>	<b>Manifest #</b>	<b>Treatment</b>	<b>Disposal</b>
Scrap Metal	Rebar and structural steel from demolition activity	1,818.67 gross tons			Recycle Tennessee Metals Company
Refrigerant	Gas	7 cylinders	BOL LF5212013		Southern Global Refrigeration Morristown, TN
Propane	Gas	12 cylinders	BOL 051613		Holston Gases Morristown, TN
					American

Used Oil	Liquid	1 tote	011147720JJK		Environmental Services, Inc. Calvert City, KY
Universal Waste (Fluorescent Lamps)	Solid	2,278 lamps	BOL 4330218		USA Lamp & Ballast Recycling Cincinnati, OH
Universal Waste (Lead Acid Batteries)	Solid	3,364 lbs.	BOL K058673		Battery Solutions Howell, MI

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

#### 2.2.1.1 Planned Response Activities

Complete disposal of container of waste oil.  
 Complete demolition of Power House and ACM disposal in the on-site landfill.  
 The reservoir dam will be modified to allow for no more than 30 acre-feet of water retention.  
 The on-site landfill will be capped and a vegetative cover established.  
 The natural gas pipeline will be restored.

#### 2.2.1.2 Next Steps

Explore AOC options with adjacent property owners, Jolley Rock Investments, LLC, and Paint Oak, LLC.

### 2.2.2 Issues

Government shut-down on the horizon.

## 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.