

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #4
Final PolRep
Rownd & Sons, Inc

Dillon, SC
Latitude: 34.4253620 Longitude: -79.3699830

To:
From: Chuck Berry, On-Scene Coordinator
Date: 1/6/2014
Reporting Period: October 12, 2013 - November 30, 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:	11/19/2013	Completion Date:	11/30/2013
CERCLIS ID:	SCN000410886	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. 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 doors, missing siding panels, and collapsed portions of the structure.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Under a Brownfield 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 Brownfield 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.

CTC Public Benefit Corporation, working for the City under another Brownfield grant 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.

CTC 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). CTC identified only one constituent that exceeded the RML: the PCB Aroclor 1260.

CTC 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. CTC delineated an area approximately 1,720 square feet at the surface and extending for at least eight feet below ground surface (bgs). CTC 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 showing 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 near 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:

- EPA OSC Berry, ERRS, and START remobilized to the site on November 13, 2013.
- START marked out the grids and indicated the excavation depths (2 or 4 feet bgs) to ERRS.
- ERRS excavated the contaminated soil and stockpiled it on site.
- ERRS loaded the soil into 18-wheel dump trucks for transport to the Environmental Quality Company's Belleville, Michigan, landfill. A total of 522 tons of soil was transported.
- The empty transformer hull was also transported to the landfill for treatment and disposal.
- ERRS arranged for transportation of the small containers, universal waste, and used transformer oil to Giant Resource Recovery of Sumter, South Carolina for further processing and treatment.
- The excavation was filled with clean backfill and covered with seed and straw.

- Work crews demobilized on November 19, 2013.

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>
PCB-Contaminated Soil, Non-hazardous	522 Tons	Interment	Wayne Disposal 49350 N Interstate 94 Service Dr, Belleville, MI 48111 MID048090833
Asbestos-Contaminated Debris, Non-hazardous	240 Tons	Interment	Anson County Landfill 375 Dozer Drive, Polkton, NC 28135 NCDENR 0401-MSWLF-1973
Basic Corrosive Liquids, (Sodium Metasilicate), D002	20 Gallons	Neutralization	Giant Resource Recovery 1229 Valley Drive Attalla, AL 35954 ALD070513767
Acidic Corrosive Liquids (Tannic Acid), D002	20 gallons	Neutralization	Giant Resource Recovery 1229 Valley Drive Attalla, AL 35954 ALD070513767
Acidic Corrosive Liquid, (Hydrochloric Acid), D002	20 Gallons	Neutralization	Giant Resource Recovery 1229 Valley Drive Attalla, AL 35954 ALD070513767
Aerosol Cans, (Flammable Liquid), D001	10 Pounds	Fuels Blending	Giant Resource Recovery 755 Industrial Road PO Box 1755 Sumter, SC 29150 SCD036275626
Flammable Liquids, (Turpentine, Xylene), D001, D018, F003, F005	55 Gallons	Fuels Blending	Giant Resource Recovery 755 Industrial Road PO Box 1755 Sumter, SC 29150 SCD036275626
Flammable Liquids Mixed with Solids, (Xylene, Acetone), D001, F005, F003	500 Pounds	Fuels Blending	Giant Resource Recovery 755 Industrial Road PO Box 1755 Sumter, SC 29150

			SCD036275626
Used Transformer Oil, Non-hazardous, Contains <50 ppm PCB.	500 Gallons	Fuels Blending	Giant Resource Recovery 755 Industrial Road PO Box 1755 Sumter, SC 29150 SCD036275626
Mercury Contained in Manufactured Articles, Universal Waste	5 Pounds	Recycling	Giant Resource Recovery 755 Industrial Road PO Box 1755 Sumter, SC 29150 SCD036275626
Fluorescent Lamps, Universal Waste	150 Pounds	Recycling	Southeast Recycling Technologies 906 Chase Drive Johnson City, TN 37604

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

All Response activities are completed at this time.

2.2.1.2 Next Steps

All Response activities are completed at this time.

2.2.2 Issues

This response was designed to eliminate the threat of direct human exposure to PCB-contaminated soil. As documented in the Action Memo, the selected response activity was intended to remove only the surficial contamination in the soil. As such, excavation only occurred at either a 2-foot or 4-foot depth. Average PCB concentrations at the 2-foot depth after excavation was 110 mg/kg, and the concentration at the 4-foot depth was 650 mg/kg. Although a normal dispersion pattern would have the lower concentrations at the deeper depth, it should be noted that the areas excavated to 4 feet were excavated solely because of extremely high concentrations at the surface and 2-foot intervals. Contamination in these areas was shown to deeper than 12 feet below the surface. Any land disturbance in the excavation area should be limited to the first 2 feet of soil, i.e. the uncontaminated backfill.

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

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.