

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
41st Avenue Wire Fluff - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #1
Initial Pollution Report
41st Avenue Wire Fluff
B41S
Birmingham, AL
Latitude: 33.5628490 Longitude: -86.7906360

To:
From: Subash Patel, OSC
Date: 3/25/2014
Reporting Period: March 18, 2014

1. Introduction

1.1 Background

Site Number:	B41S	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	
Response Lead:	EPA	Incident Category:	
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	6/25/2013	Start Date:	5/15/2013
Demob Date:		Completion Date:	
CERCLIS ID:	B41S	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Non-NPL Removal Site Assessment

1.1.2 Site Description

Wire fluff is the plastic sheathing used to cover and/or insulate wire and is a waste product associated with recycling scrap wire. Once the scrap wire is stripped of its metallic core, the plastic sheathing is typically chopped into small pieces, primarily to facilitate its handling during storage/disposal. Wire fluff material can contain elevated levels of lead, phthalates, and PCBs.

The 41st Avenue Wire Fluff site was discovered during the assessment for the 35th Avenue site. Initial sampling performed in February 2013 demonstrated that portions of this material contained elevated levels of lead. Due to the industrial nature of the property, a separate investigation was initiated for this Site.

The property is in a residential neighborhood bordered by industrial facilities. A rail switch yard is to the immediate east, residences to the north, and undeveloped industrial property surrounds the property to the west and south. The most obvious feature of the property is the 40,000 tons of wire fluff occupying the southern half of the property. The pile is 30 feet high at the northern edge, which, due to occasional removal of sections of fluff, forms a vertical cliff from the top to ground level. The pile is about 300 feet wide and as deep, with the elevation tapering off to ground level to the south. The balance of the site is generally covered with a thin veneer of fluff, varying from a few inches to a foot thick. Beneath the fluff is a layer of soil and debris remaining from when the property was a metal recycling facility. The soil is about 6 inches thick in most places, but varies from nonexistent to almost a foot deep. Below the soil is a hardpan of an unknown substance. The hardpan material is reported to be waste slag from a rock wool manufacturing process, but that is unconfirmed. The hardpan is irregular and unlevel. It is mainly the soil layer that is of concern for lead concentrations.

A stream runs through the property, entering the property along the southern boundary, running beneath the southeast corner of the pile, and then out along the eastern edge of the pile and down the eastern property line along the tracks. It also partially empties into the northern section of the property, along 41st Avenue, causing a saturated, muddy area with standing water in places.

A review of historical aerial photography indicates that the fluff was placed in this location sometime during the early 1980's. A local metal recycling company previously used this property to recycle waste wire and the insulation stripped from the wire (wire fluff) was left on the property. JK Holdings, managed by Mr. Roger

West, purchased this site in 2006, retaining the wire fluff with the intent to convert the material into a salable product.

1.1.2.1 Location

The site address is 3000 41st Avenue, Birmingham, Alabama.

1.1.2.2 Description of Threat

Lead has been detected in the soil layer at concentrations above the Region 4 Removal Management Level of 800 milligrams per kilogram (mg/kg) for industrial exposure scenarios.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Under the Removal Site Evaluation for the 35th Avenue site, EPA gained access to the property and collected soil samples on February 28, 2013, EPA collected seven samples. Two were from the wire pile itself, WF-SB007 and WF-grab1. WF-SB001, WF-SB003, WF-SB004, WF-SB005, and WF-siftedpile were collected from the compacted material on the northern half of the property. Sample WF-siftedpile was taken from an area that appeared to contain fines from screening of the fluff. WF-Sediment was taken from the creek adjacent to the eastern boundary of the fluff pile. The samples were analyzed for metals, PCBs, and SVOCs.

Laboratory analysis of the samples revealed that samples WF-SB001 and WF-SB005 had lead concentrations of 1600 ppm and 7,500 ppm, respectively. This is above EPA's Removal Management Level (RML) for lead in an industrial setting (800 ppm). Lead concentration of 270 ppm was present in sediment sample WF-Sediment collected adjacent to the fluff pile. No upgradient sediment sample was collected so the impact to the sediment from the fluff pile was not assessed at this time. Laboratory results for the remainder of the samples indicated that constituents were either below their corresponding RML for industrial exposure, non-detectable, or below reportable quantities.

Based on those samples and the site's history as a metal recycler, EPA decided the property would best be considered separately from the 35th Avenue Site as a whole.

On December 10, 2013, EPA collected additional samples to assess the extent of lead in the areas initially identified in the February 28, 2013 investigation (areas WF-SB001 and WF-SB005). A survey of the site revealed that this area consists of a relatively thin layer of wire fluff and soil which varies between 0.5 inches to 24 inches in thickness and is located atop the aforementioned hardpan. The lead concentrations in this area are distinctly different from the lead concentrations observed in the large mound of wire fluff comprising the remainder of the site.

A total of 24 samples were screened with an XRF and 4 samples were split and sent to a laboratory for analysis. The XRF values for the samples ranged from 376 ppm to 6210 ppm. With the exception of sample WF-SB001h (376 ppm), all of the XRF results for the material were above EPA's RML for lead (800 ppm) for an industrial exposure scenario. The laboratory sample results ranged in concentration from 620 ppm to 6600 ppm for lead.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On March 18, 2014, OSC Berry met with Mr. Roger West at the site. Mr. West stated JK Holdings was in the process of signing a contract with a Georgia corporation to process the wire fluff back into petroleum fuel. This is a beneficial reuse of the product and falls outside the purview of CERCLA oversight. Mr. West stated JK Holdings expected to begin removal of the fluff beginning in April, 2014.

Since removal of the fluff pile covering half of the site will allow for a more detailed and thorough survey of the substratum beneath the entire site, EPA feels there is benefit to waiting for the pile to be removed prior to initiating a removal action. Given the thickness of the wire fluff covering the contaminated soil beneath, human exposure will be limited.

EPA will monitor the PRP's progress and commitment to removing the material and stands prepared to negotiate an order to force the removal of the currently-accessible areas of contaminated soil, if necessary.

2.1.2 Response Actions to Date

No removal actions have been taken to date.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

JK Holdings, LLC, an Alabama limited liability corporation, is the listed owner of the property. Mr. Roger West is acting as the manager for the LLC.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

EPA will monitor and assess the PRP's commitment to removing the wire fluff from the site.

2.2.1.2 Next Steps

EPA OSCs will make periodic site visits to assess the PRP's progress.

2.2.2 Issues

During investigation of the 35th Avenue site, Sampling teams discovered 8 nearby residential properties with substantial amounts of wire fluff used as fill. Of these 8, 6 have lead, arsenic, polyaromatic hydrocarbon, and/or PCB levels above the Region 4RML. Of these 6, 3 are currently scheduled to undergo removal of contaminated soil under the 35th Avenue Site time-critical removal action being performed by the Emergency response and Removal Branch. The remaining 3 will be considered for removal under the planned non-time-critical removal action contemplated by the Region 4 Remedial Branch. No residential property is currently being considered for removal under this action, but EPA reserves the right to alter this stance.

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

No information available at this time.

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.