U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Delta Mills Removal Site - Removal Polrep
Initial Removal Polrep

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
**Region IV**

**Subject:** **POLREP #2**
**Start of Removal Activities**
**Delta Mills Removal Site**
**B43C**
**Wallace, SC**
**Latitude: 34.7171100 Longitude: -79.8568900**

**To:**
**From:** Brian Englert, Federal OSC
**Date:** 7/22/2014
**Reporting Period:** 7/14/2014 to 7/22/2014

## 1. Introduction

### 1.1 Background

| | | | |
|---|---|---|---|
| **Site Number:** | B43C | **Contract Number:** | |
| **D.O. Number:** | | **Action Memo Date:** | 5/22/2014 |
| **Response Authority:** | CERCLA | **Response Type:** | Time-Critical |
| **Response Lead:** | EPA | **Incident Category:** | Removal Action |
| **NPL Status:** | Non NPL | **Operable Unit:** | |
| **Mobilization Date:** | 7/14/2014 | **Start Date:** | 7/15/2014 |
| **Demob Date:** | | **Completion Date:** | |
| **CERCLIS ID:** | SCN000411028 | **RCRIS ID:** | |
| **ERNS No.:** | | **State Notification:** | |
| **FPN#:** | | **Reimbursable Account #:** | |

#### 1.1.1 Incident Category

Time Critical Removal Action

#### 1.1.2 Site Description

The Site consists of an approximately 0.42-acre portion of the former Delta Mills facility consisting of two ASTs (300,000 and 500,000 gallons in capacity) that had been used to hold No. 6 fuel oil and now contain PCB-contaminated oil, and a pump house where PCB spills have occurred. This 0.42-acre parcel is currently owned by Schwarz Wallace LLC. The remainder of the 620 acre Delta Mills Facility has been purchased by Southern States Energy and is being addressed as a “Brownfield” site under a Voluntary Cleanup Contract with South Carolina Department of Health and Environmental Control (SCDHEC).

##### 1.1.2.1 Location

The Site consists of an approximately 0.42-acre portion of the former 620-acre Delta Mills facility, a former textile dyeing and finishing plant. The Delta Mills facility is located at 4351 Brickyard Road, Wallace, Marlboro County South Carolina 29596. The latitude for the Site is 34.71711° and the longitude is -79.85689°. The 0.42-acre parcel consists of two ASTs and a pump house. The property is bordered by a drainage ditch and railroad tracks directly to the north, a gas station directly to the northwest and the Delta Mills facility to the south and east. The drainage ditch adjacent to the parcel is a tributary to the Pee Dee River which is approximately 1.2 miles from the Site.

##### 1.1.2.2 Description of Threat

PCBs are hazardous substances as defined by Section 101(14) of CERCLA. The large volume of PCB-contaminated used oil at the Site, along with PCB releases into the soil and pump house at the Site, constitute a threat to public health and to the environment.

Two releases have been documented at the Site and no previous response actions have been conducted. The concentrations of PCBs found in the used oil at the Site are above the TSCA disposal requirement of ≥50 mg/kg found in 40 CFR, Part 761.60 for PCB liquids. The concentrations of PCB found in the soil outside the pump house at the Site exceed the EPA’s industrial Removal Management Level (RML) of 74 mg/kg.

Breaks-ins and vandalism at the Site have been documented, and the drainage ditch adjacent to the Site is a tributary and potential pathway for contamination to migrate into the Pee Dee River. The tanks and pump house at the Site are in deteriorating condition and contain PCB-contaminated used oil.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The U. S. Environmental Protection Agency's Resource Conservation and Recovery Act Program referred the Site to Superfund's Emergency Response and Removal Branch for consideration of a time-critical removal action on July 17, 2013, due to the large amount of used oil contaminated with PCBs above Toxic Substances Control Act (TSCA) regulatory levels and previous releases which have occurred at the Site.

The EPA Region 4 Science and Ecosystem Support Division (SESD) collected eight samples on June 7, 2011. Laboratory analyses detected PCBs in five of the eight samples. Two of the five waste samples exceeded the TSCA disposal requirement of ≥ 50 mg/kg found in 40 Code of Federal Regulations (CFR) Part 761.60 for PCB liquids. The sample collected from a 500,000-gallon aboveground storage tank (AST) contained PCB-1260 at 3,200 mg/kg, and a sample collected from the pump house contained PCB-1260 at 610 mg/kg. A soil sample collected on-site revealed PCB-1260 at 120 mg/kg, exceeding the industrial Removal Management Level (RML) of 74 mg/kg.

Since the ASTs are not maintained, there is a potential of release of PCB oil from these ASTs that could cause contamination to migrate off-site. There has already been a release of PCB-contaminated oil outside secondary containment that has flooded the floor of the pump house and contaminated the soil outside of the pump house and the secondary containment. An additional release has been documented inside secondary containment, and stained soil is clearly visible.

PCB-contaminated oil at the Site is a documented source of contamination at the P&W Superfund Site. There is also a potential of exposure of PCBs to trespassers as the EPA has documented on-going trespassing and the presence of graffiti. Several break-ins have occurred at the property, and metal has been scavenged from the Site.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

Environmental Restoration LLC, Tetra Tech, and EPA mobilized to the Site and began removal activities. Equipment was staged and ERRS crews began demolition of onsite structures so that removal operations could proceed and ASTs containing PCBs could be accessed.

Environmental Restoration LLC began demolition of a 500,000 and 300,000 gallon above ground storage tanks (AST) by removing portions of the tanks so the material inside could be accessed. Upon discovery of possible asbestos containing material in nearby piping insulation, samples were collected and tested for asbestos. Initial samples determined that the material did not contain asbestos; however discovery of an additional type of insulation prompted further testing and delay of any piping demolition.

Additional samples were collected to confirm a 300,000 gallon AST contained only non TSCA material. Sample results were nondetect for PCBs. The material was mixed with sawdust and sent to a nearby facility for fuel blending and reuse in a cement kiln. Three additional TSCA sludge and oil samples were collected from a 500,000 gallon AST and blended with different amounts of soil and saw dust to determine optimum BTU values for disposal facilities. An area toward the southern end of the Site was excavated and TSCA contaminated soil was staged for disposal at a later date.

EPA OSC Englert began coordinating onsite meetings with the local fire chief, local emergency management authority and personnel from South Carolina's Department of Health and Environmental Control (SCDHEC).

#### 2.1.2 Response Actions to Date

ERRS crews, START, USCG Strike Team and EPA have mobilized to the Site.

Removal activities began

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

Enforcement activities continue with the identification and Noticing of PRPs.

#### 2.1.4 Progress Metrics

| ***Waste Stream*** | ***Medium*** | ***Quantity*** | ***Manifest #*** | ***Treatment*** | ***Disposal*** |
|---|---|---|---|---|---|
| Non TSCA Sludge/Oil | Sludge and used oil | est 18,049 gallons | TBD | Solidification | Fuel Blending/Reuse |
| TSCA Sludge/Oil/Soil | Sludge and used oil | est 31,080 gallons | TBD | Solidification | Incineration |
| | | | | | |

### 2.2 Planning Section

#### 2.2.1 Anticipated Activities

The following activities are anticipated during the next reporting period:
Removal operations will continue
Transportation and disposal of TSCA and nonTSCA waste will begin
Meetings with SCDHEC, local fire chief and EMA will take place

##### 2.2.1.1 Planned Response Activities

Continuation of removal activities and meetings with local authorities will take place

##### 2.2.1.2 Next Steps

No additional information is available at this time

#### 2.2.2 Issues

### 2.3 Logistics Section

No information is 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

### 3.1 Unified Command

### 3.2 Cooperating Agencies

South Carolina Department of Health and Environmental Control (SCDHEC)

## 4. Personnel On Site

The following personnel are Onsite during this reporting period

1 OSC
4 ERRS Contractors
1 START Contractor (intermittent)
1 USCG Strike Team Serving as designated FOSC during OSC absence

## 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.