

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #4
Continuation of Removal Activities
Delta Mills Removal Site
B43C
Wallace, SC
Latitude: 34.7171100 Longitude: -79.8568900

To:
From: Brian Englert, Federal OSC
Date: 8/25/2014
Reporting Period: 7/30/2014 to 8/15/2014

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

Following completion of all asbestos abatement activities and removal of Chrysotile and Amosite asbestos, one supervisor remained onsite should any additional asbestos be encountered. Following removal of all non TSCA oil and sludge a 300,000 gallon AST was demolished and debris were cleared from the Site in preparation for further demolition activities. The contents of a 500,000 gallon AST were removed and staged prior to transportation to incinerator facilities. ERRS crews completed demolition of the remaining 500,000 gallon AST.

Initial screening wipe samples revealed that larger portions of the tank had been in contact with PCBs than previously believed. Further wipe sampling indicated that decontamination to meet the performance based standard of 10ug/100cm² could be difficult, time consuming and costly. It was initially believed that the tank had been constructed entirely of 3/8 inch plate steel but upon demolition it was determined that the entire upper portion of the tank was constructed with considerably thinner steel (believed to be 1/8 inch plate steel) and that disposal would be more cost effective than decontamination following the procedures found at 40 CFR Part 761.

Following start of excavation of the pump house and surrounding soil ERRS crews uncovered an abandoned gas line. Digging was ceased and the local gas company was notified and informed ERRS crews that the line was not their property. It was determined that the line was originally part of the Delta Mills facility and had been abandoned and the area around the line was backfilled. Excavation operations continued avoiding the area around the line.

2.1.2 Response Actions to Date

ERRS crews, START, USCG Strike Team and EPA have mobilized to the Site and removal activities have started. Transportation and disposal of is ongoing.

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

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Non TSCA Sludge/Oil	Sludge and used oil	18,049 gallons			Fuel Blending/Reuse
TSCA Sludge/Oil/Soil	Sludge and used oil	31,080 gallons			Incineration

2.2 Planning Section

2.2.1 Anticipated Activities

The following activities are anticipated during the next reporting period:
Asbestos abatement activities will be complete
Transportation and disposal of nonTSCA material will be complete
Transportation and disposal of TSCA material will begin

2.2.1.1 Planned Response Activities

Continuation of removal activities

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.