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

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

**Subject:** **POLREP #6**
**Final POLREP**
**Delta Mills Removal Site**
**B43C**
**Wallace, SC**
**Latitude: 34.7171100 Longitude: -79.8568900**

**To:** Jim Webster, Superfund, ERRB

**From:** Brian Englert, Federal OSC
**Date:** 9/16/2014
**Reporting Period:** 9/4/2014 to 9/24/2014

## 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:** | 9/24/2014 |
| **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 $\geq$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

Analytical results from excavated areas reveal many areas are nondetect for PCBs and all detectable results are below 6 ppm. Clean soil was used to backfill excavated areas. OSC Englert is coordinating with state agencies, the Brownsfield Program, PRPs and the owner of the adjacent property to brief them on the completion of removal activates. Onsite powerlines which were moved so that the removal operations could take place have been moved back to their original position.

#### 2.1.2 Response Actions to Date

ERRS crews, START, USCG Strike Team and EPA have completed removal activities.

#### 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 Liquids | Sludge and Used Oil | 115 Tons | NA | | Fuel Blending/Reuse |
| TSCA Liquids | Oil and Sludge | 309 Tons | NA | | Incineration |
| TSCA Solids | Soil | 528 Tons | NA | | Landfill |

### 2.2 Planning Section

#### 2.2.1 Anticipated Activities

OSC Englert is coordinating with state agencies, the Brownsfield Program, PRPs and the owner of the adjacent property to brief them on the completion of removal activates.

#### 2.2.1.1 Planned Response Activities

OSC Englert is coordinating with state agencies, the Brownsfield Program, PRPs and the owner of the adjacent property to brief them on the completion of removal activates.

#### 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

**Estimated Costs ***

| | Budgeted | Total To Date | Remaining | % Remaining |
|---|---|---|---|---|
| **Extramural Costs** | | | | |
| ERRS - Cleanup Contractor | $900,000.00 | $85,229.10 | $814,770.90 | 90.53% |
| IAGs | $25,000.00 | $4,000.00 | $21,000.00 | 84.00% |
| TAT/START | $60,000.00 | $1,705.08 | $58,294.92 | 97.16% |
| **Intramural Costs** | | | | |
| USEPA - Direct | $45,000.00 | $45,000.00 | $0.00 | 0.00% |
| | | | | |
| **Total Site Costs** | $1,030,000.00 | $135,934.18 | $894,065.82 | 86.80% |

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

### 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.