

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Trex Properties Site - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #1  
Initial  
Trex Properties Site  
B46U  
Charlotte, NC  
Latitude: 35.2489000 Longitude: -80.8096550

**To:**  
**From:** Kenneth Rhame, OSC  
**Date:** 8/20/2015  
**Reporting Period:** 8/11/2015 to 8/20/2015

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	B46U	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Emergency
<b>Response Lead:</b>	PRP	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	8/11/2015	<b>Start Date:</b>	8/11/2015
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>		<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

CERCLA  
Emergency Response

#### 1.1.2 Site Description

Properties neighboring a former hazardous waste treatment, storage, and disposal (TSD) facility.

##### 1.1.2.1 Location

Properties next to 3114 Cullman Avenue.

##### 1.1.2.2 Description of Threat

Vapor Intrusion related to high concentrations of trichloroethene (TCE).  
Releases of hazardous substances due to improper disposal and storage of drums.

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

EPA observed several containers (drums) in the non-hazardous waste storage area that had leaked, some were bulging, some were in extremely poor condition. Though these containers were said to be non-hazardous waste, most did contain hazardous substances. Some drums were observed to contain TCE. A dismantled solvent recovery system was observed in the haz-waste warehouse. Several cracks were observed in the floors in the non-haz and haz warehouses.

Upon NCDENR serving a administrative warrant on August 19 to access four semi-trailers that they had been attempting to get access to for several months and the discovery of mutiple hazardous waste drums (some leaking and some bulging)in the four trailers; NC DENR requested U.S. EPA to take control of the Site and conduct an emergency response.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

U.S. EPA received a request to conduct a Removal Site Evaluation (RSE) on August 11, at the Trex Properties Site due to the recent discovery of trichloroethene (TCE) in shallow groundwater. TCE was documented as high as 400,000 parts per billion (ppb) next to a church. These groundwater samples were collected by a consultant of Trex Properties. Trex Properties recently purchased the property at 3114 Cullman Ave that was previously owned by Detrex Corporation. Detrex Corp. contracted Parts Cleaning

Technologies (PCT) to operate and manage a hazardous waste treatment, storage, and disposal (TSD) facility.

The OSC consulted with Region 4's Scientific Support Section who recommended an expedited assessment. The OSC mobilized to the Site on August 12 to obtain access agreements from the church, Trex Properties, and a scrap leather business to the west. The assessment work was scheduled to begin August 18, air was analyzed using the Trace Atmospheric Gas Analyzer (TAGA).

While conducting the RSE, the North Carolina Department of Environment and Natural Resources served Trex Properties and PCT with an administrative warrant to search four semi-trailers that they had been trying to gain access to for months. When opening the trailer, they observed several drums of hazardous waste. Some of the drums appeared to be leaking, some of the drums appeared to be under pressure (bulging). NC DENR requested that U.S EPA take control of the Site. EPA initiated an emergency response action at the Site on Wednesday August 19. EPA notified Trex Properties to provide verbal notice, Trex Properties hired SWS to stabilize the site.

### 2.1.2 Response Actions to Date

Trex Properties hired SWS to stabilize the Site.

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

Trex Properties  
Detrex Corporation  
Parts Cleaning Technologies (PCT)

### 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

Stabilize Drums (Overpack Leaking Drums)  
Depressurize Bulging Drums  
Stage drums based on compatibility  
Properly characterize, transport and dispose of drums  
Characterize threats related to vapor intrusion

#### 2.2.1.1 Planned Response Activities

Site Stabilization  
Characterize Vapor Intrusion Threats

#### 2.2.1.2 Next Steps

Overpack leaking containers  
De-pressurize bulging drums  
stage drums based on compatibility  
properly characterize, transport and dispose of drums on site

#### 2.2.2 Issues

## 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.