

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Beech Creek Superfund Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #3
Beech Creek Superfund Site
B4X7
Waynesboro, TN
Latitude: 35.3297000 Longitude: -87.7850000

To:
From: Steve Spurlin, OSC
Date: 9/4/2015
Reporting Period: July 17, 2015 through September 6, 2015

1. Introduction

1.1 Background

Site Number:	B4X7	Contract Number:	
D.O. Number:		Action Memo Date:	2/21/2014
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	6/2/2014	Start Date:	6/2/2014
Demob Date:		Completion Date:	
CERCLIS ID:	TND000410901	RCRIS ID:	
ERNS No.:		State Notification:	02/10/2014
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

This is a time critical removal action being conducted by a group of potential responsible parties (prps) pursuant to an U. S. Environmental Protection Agency (EPA) Order on Consent. The Order requires sampling to identify the extent of polychlorinated biphenyl (PCB) contamination in Beech Creek, and it's associated floodplain areas. Following completion of the sampling, removal of PCBs exceeding EPA's established cleanup level will be undertaken.

1.1.2 Site Description

1.1.2.1 Location

The Site is located near the intersection of US Highway 64 and Clifton Turnpike, west of Waynesboro in unincorporated Wayne County, Tennessee. The Site is comprised of the bed, banks and floodplain of Beech Creek, beginning at the fence near the north end of land Parcel No. 067037.00 and continuing north approximately 0.5 miles, into Parcel No. 046006.00), and the aerial extent of contamination emanating there from, which may vary according to local topography and hydrology. The Site is approximately centered at latitude 35.329752 and longitude -87.785042.

1.1.2.2 Description of Threat

The landfill at the head waters of Beech Creek was initially an uncontrolled roadside dump in the late 1930s, which was then managed by the City of Waynesboro beginning probably in the 1950s. The city began to periodically push and level refuse down the steep ravine toward the headwaters of Beech Creek. In the late 1960s and early 1970s, documented industrial disposal contributed large quantities of spent electrical capacitors, liquid waste PCBs and other PCB-impregnated wastes. A report by TDEC in 1992 estimated that 36,000 pounds of PCBs were placed into the landfill between 1969 and 1972. Local industry also disposed of an estimated 10,000 gallons of TCE from 1970 to 1972, with some evidence of dumping directly to Beech Creek. Contamination of Beech Creek has been documented since at least the 1970s.

The results of the EPA Removal Site Investigation indicate that PCBs have been released into the environment at the Site. These PCBs are migrating and, unless mitigated, will continue to migrate, downstream to affect residential property. Because of the durability of PCBs in the environment, current contamination is likely due to historical releases directly to the creek from the landfill area.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In October and November 2010, the Tennessee Department of Environmental Control ("TDEC") conducted sampling of groundwater, drinking water wells, sediment and surface water in and around Beech Creek.. TDEC detected levels of polychlorinated biphenyl compounds ("PCBs") in the sediment in Beech Creek at 140 milligrams-per-kilogram (mg/kg) at a point 200 yards north of the fence along the southern border of the Site and 130 mg/kg at 3.3 miles downstream, north of the Site. As a result, TDEC in May 2011, requested that the EPA follow up with additional sampling of Beech Creek.

At TDEC's request, the EPA performed a Removal Site Evaluation of the Site in August 2011. The EPA took seven (7) sediment samples in the creek bed and on the banks of Beech Creek beginning about 100 feet north of the fence along the southern border of the Site and continuing about 0.25 miles northward. All samples exceeded the EPA Residential Removal Management Level ("RML") for PCBs of 22 mg/kg, with concentrations ranging from 50 mg/kg to a high of 940 mg/kg. Additional sampling further downstream north of the Site detected PCBs in creek sediments above the 0.22 mg/kg EPA Regional Screening Level (RSL).

In 2012, TDEC and the EPA took additional samples in the creek bed, banks and flood plain of Beech Creek within the Site and continuing north to the confluence of Beech Creek with the Tennessee River. Analytical data from 2012 confirmed levels of PCB contamination above the RML in thirteen (13) of the twenty-one (21) samples within the Site. Samples from locations just north of the fence to 0.5 mile downstream indicated concentrations ranging from 0.17 mg/kg to a high of 160 mg/kg.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Operations starting June 17, 2015 are focused on the preparation phase of the Beech Creek removal project.

Site preparation activities to complete activities in accordance with the Excavation and Disposal Work Plan and the Project Execution Plan continued during the reporting period.

2.1.2 Response Actions to Date

Activities for period June 17, 2015 to September 6, 2015 include the following:

- June 17, 2015-On Site Kick Off Meeting with OSC Steve Spurlin, Environ Project Manager A. Fowler, and Environs' removal subcontractor, Severson. Reviewed site plans that included the Materials Handling Plan, Excavation Plan, HASP and other site plans.
- June 22, 2015 Meeting with the City of Waynesboro, EPA START representative, Environ Project Manager A. Fowler, Environ, and Severson, Environs' cleanup subcontractor. Reviewed the project scope and HASP as well as other site plans.
- June 30, 2015 On Site Meeting with OSC Steve Spurlin, Environ Project Manager A. Fowler, Environs' subcontractor Severson, and representatives of the Tennessee Department of Environment & Conservation. The group toured the Site to observe progress with site set-up activities.
- Continued enhancement of the haul road along the work areas adjacent to the creek including the placement of fabric and stone to provide a road base.
- Placement of crane mats for creek crossings, placement of drainage pipes, and placement of erosion control materials.
- Continued construction of the Materials Handling Pad including construction of the decontamination station and contaminant reduction zones, sealing of the concrete curbs, tightening of connections in the wastewater treatment plant, installation of filter socks around the water discharge line, construction of a depression to act as a sump, and addition of signage on the fence enclosing the pad.
- Tree removal in the along the creek. The trees and brush that have been removed are either being placed in habitat piles (for materials over 6 inches in diameter) or mulched (for materials less than 6 inches in diameter).

Drafting of a revised Project Execution Plan to address questions and comments from USEPA, TDEC, and ADEM is ongoing.

Preparation of a draft revision to the Quality Assurance Project Plan to provide redundant analytical laboratory capacity to minimize the potential for delays in backfilling and/or disposal of materials due to delays in analysis of waste characterization and/or confirmation samples is ongoing.

The milestone schedule that was submitted with the Field Sampling Plan has been updated, as necessary, to reflect the activities performed during this reporting period. A copy of the updated schedule is included in Attachment 1.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (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>

2.2 Planning Section

2.2.1 Anticipated Activities

- Drafting of a revised Project Execution Plan. Preparation of a draft revision to the Quality Assurance Project Plan to provide redundant analytical laboratory capacity to minimize the potential for delays in backfilling and/or disposal of materials due to delays in analysis of waste characterization and/or confirmation samples is ongoing.
- Continue the excavation of areas identified in the excavation plan, monitor activities at the Material Handling Pad.
- Confirmation sampling of excavated areas.
- Backfill of excavated areas

2.2.1.1 Planned Response Activities

The contractor, Environ, begin excavation during the week of August 31,2015..

2.2.1.2 Next Steps

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.