U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Liberty Fibers - Removal Polrep
Final Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: **POLREP #24**
Site Restoration and Removal Action Demobilization
Liberty Fibers
B457
Morristown, TN
Latitude: 36.1493481 Longitude: -83.2048083

To:
From: David Andrews, On-Scene Coordinator
Date: 4/30/2016
Reporting Period: 5/31/2015 to 4/30/2016

1. Introduction

1.1 Background

Site Number:	B457	**Contract Number:**	EP-S4-15-04
D.O. Number:	0013	**Action Memo Date:**	9/26/2012
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	4/21/2010	**Start Date:**	4/21/2010
Demob Date:	4/29/2016	**Completion Date:**	4/29/2016
CERCLIS ID:	TNN000410507	**RCRIS ID:**	
ERNS No.:	NRC 937191	**State Notification:**	4/21/2010
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category
Time-Critical Removal Action

The scope of work for this action is to complete site restoration and remove concrete barriers, steel cables and high visibility fencing and warning signage along there restricted access borders of the former hot-zone work perimeter within the site property.

1.1.2 Site Description

The Liberty Fibers site (Site) is approximately 230 acres of the American Enka/BASF Corporation textile plant located in the Lowland Industrial Complex community. Liberty Fibers began manufacturing Rayon in 1947. The Site is located in a rural area approximately six miles southeast of downtown Morristown, Hamblen County, Tennessee. The Site is bordered immediately to the south and southeast by the former Nylon Staple and Polyester Staple plants. The Site is bordered to the north by a Norfolk Southern railroad line and approximately six residences and farmland. The Site is bordered to the east by a former BASF landfill, forest, and other rural land. The Site is bordered to the west by Enka Highway, beyond which is farmland and a wastewater treatment facility. Distances from the Site to nearby residences range from approximately 300 to 2,500 feet to the north, northeast, and northwest of the LF site. The nearest school, Union Heights Elementary School, is located less than three miles northwest of the Site. A daycare center, Tabernacle Day Care, is located about six miles west-northwest of the LF Site. The topography of the Site is relatively flat. Drainage is to Nylon Creek Flat Creek and the Nolichucky River.

1.1.2.1 Location
The Site is located at 4901 Enka Highway (State Route 160), Morristown, Hamblen County, Tennessee. The geographic coordinates for the Site are 36.15580 degrees north latitude and -83.20645 degrees west longitude.

1.1.2.2 Description of Threat
Exposure to friable asbestos is the primary threat. The Site is covered in piles of demolition debris interspersed with friable asbestos and estimated thousands of linear feet of pipe wrapped in deteriorated asbestos-containing thermal system insulation (TSI) throughout the Site. The Site is not secure by evidence of routine trespassing. There are businesses operating in the buildings surrounding the Site and several residential properties neighboring the Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results
On September 19, 2006 EPA and TDEC visited the Lowland Complex to inspect the conditions at the site during early salvage work. A multimedia inspection was later conducted on March 20-21, 2008. EPA inspected the Site

again December 3-4, 2009, and a Removal Site Evaluation (RSE) was performed on January 18-22, 2010. On April 19, 2010, alleged hot work (cutting torch) activities initiated a fire along the southern perimeter of the Site. EPA and The Morristown Fire Department responded. The responding OSC (Perry Gaughan) requested that EPA Region 4 Technical Services Section (TSS) evaluate asbestos sampling results from January 2010 RSE to determine if a threat to human health and the environment exists on Site. The OSC determined that the threat exists, served the owner with a Notice of Federal Interest, and initiated an emergency response action.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

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In April 2010, EPA and contractor support provided by the Emergency Rapid Response Service (ERRS) responded to a fire on the former Liberty Fibers property on the Lowland Industrial Complex located east of Morristown, Tennessee on Hwy 160 (Enka Highway). Since 2006, equipment and metal salvage operations had been conducted on the property as well as abatement operations for asbestos insulation and asbestos based containing substances (ABS). After a removal site evaluation (RSE) identified friable asbestos throughout the property in demolition debris piles, the EPA OSC initiated measures to stabilize the site including restricting site access, establishing site security and application of a polymer-based agent on the debris piles to fix the asbestos piles in place and prevent off-site migration.

The removal action by EPA from August 2011 through May 2015 was conducted in multiple stages or phases to include (See 2.1.4 - Progress Metrics) - Obtaining written access to the property from the PRP; Construction of a Class III landfill on-site; Removal of ACM contaminated building demolition debris piles over approximately 80 acres of building foundation, basements and soil; removal and disposal of approximately 7-miles of elevated pipe-runs over the property that was jacketed with TSI; Disposal of over 20,000 bags of abandoned asbestos waste, stored in the Electrical Building, left behind from previous abatement work; and disposal/recycling coordination of numerous orphan containers of hazardous waste, cylinders, and miscellaneous waste streams identified throughout the site. Approximately 1,800 gross tons of structural steel was also segregated/decontamoinated and recycled.

2.1.2 Response Actions to Date

During this reporting period:

4/21/2016: **Site Restoration and Removal Action Demobilization**

- September 22, 2015 - Validated data was released to EPA from their contract laboratory. START was under task to draft an Activity Based Air and Bulk Material Sampling Report.
- December 8, 2015 – OSC requested Region 4 Technical Services Section (TSS) to review the ABS data and determine human health exposure risk relevant to commercial/industrial reuse. The 10E-4 screening level, comparable to an RML, is 0.01 f/cc. None of the detections exceed that number.
- December 21-22, 2015 – The OSC and START conducted a site walk to evaluate site conditions and assess if any further actions by EPA is warranted. The OSC discusses EPA's intentions to remove concrete barriers, steel cables, high-visibility plastic fencing and warning signs with current property manager (Mr. Larry Allen). The OSC advised Mr. Allen that EPA would return in the Spring 2016 to conduct site restoration and reopen the restricted areas on the property.
- February 9, 2016 - Draft Activity-Based Air and Bulk Material Sampling Report Liberty Fibers Site released to OSC for review.
- April 26 – 28, 2016 - EPA OSC and Emergency Rapid Response Services (ERRS) contractor (CMC, Inc.) remobilized to the Site to remove 65 concrete jersey barriers from perimeter locations on the Site and staged them next to the Power House or Grid F-13 per the START Grid Map (see Documents). Approximately 400-yds of steel cable and high visibility fencing taken down and disposed. Warning signage identifying areas of asbestos contaminations removed.
- The Tennessee Department of Environment and Conservation (TDEC) concurrently conducts site investigation of surface water on the Lowland Complex on Nylon Branch and Flat Creek.
- April 29, 2016 – EPA OSC and ERRS contractor demobilized from the Site.
- No further action by EPA anticipated at the Site at this time

Previous Reporting Period:

POLREP No. 23 - PROGRESS - ACTIVITY BASED SAMPLING

Date:	5/30/2015
Reporting Period:	4/1/2014 to 5/30/2015

During this reporting period:

February 10, 2015 – CMC remobilized to the Site to conduct replace and repair barrier fences that were cut down.

March 23-26, 2015 – CMC remobilized to the Site to evaluate site conditions, conduct site maintenance and mow areas within the operational grids prior to upcoming activity based sampling event scheduled for May 2015.

May 11–14, 2015 - EPA and the Superfund Technical Assessment and Response Team (START) conducted activity-based sampling (ABS) and bulk material sampling event. The primary objective was to evaluate the grid 92 grids encompassing the Liberty Fibers Site for potential human exposures to asbestos, by conducting activities at the site that cause disturbance of soil, surfaces, and debris potentially contaminated with asbestos. Additionally, the data

gathered will be used to qualify if the mitigation efforts by EPA were effective in removing the source contamination which would correspond to a reduction in exposure risk to asbestos at the site.

**** Extended demobilization of personnel and equipment pending ABS data review. ****

POLREP No. 22 – REMOVAL OPERATIONS - PROGRESS

Date:	3/31/2014
Reporting Period:	10/01/2013 - 3/31/2014

Highlights during this period:

10/23/13 -Completed ACM removal from Power House and disposal in the on-site landfill.
11/11/13 - Completed reservoir dam modification next to landfill to allow for no more than 30 acre-feet of -water retention.
11/22/13 - CMC continued scraping surface soil to remove residual ACM and completed establishing stable vegetative cap over on-site landfill.
12/21/13 - Restored natural gas pipeline servicing the Site.
1/14/14 - Demobilized equipment and personnel pending ABS data review.
During this period TetraTech continued visual inspection and clearance of grids and provided perimeter air sampling and Site documentation.

POLREP No. 21 - REMOVAL OF ACM FROM POWER HOUSE

Date:	11/6/2013
Reporting Period:	7/01/2013 to 9/30/2013

Removal of ACM debris continues with the focus now on the partially-demolished Power House. Remaining hazardous materials are being prepared for disposal.

The Site was demobilized for the Independence Day Holiday and the Labor Day Holiday in this reporting period.

Highlights from this period:

CMC provided transportation and disposal of hazardous substances, pollutants or contaminants left in abandoned containers on-site.

During this period:

- CMC provided transportation and disposal of hazardous substances, pollutants or contaminants left in abandoned containers on-site.
- 9/30/2013 - CMC completed disposal, recycling, or reuse of compressed gas cylinders including hydrogen and trichlorofluoromethane, a roll-off box of RCRA empty containers, a roll-off box of silica, talc, and other spent products, a roll-off box of caustic solids (sodium hydroxide), universal waste fluorescent bulbs, and a pallet of damaged lead acid batteries form a forklift battery.
- July 10, 2013 - EPA received a letter dated July 10, 2013, from the City of Morristown Chief Building Official condemning the Power House and northeastern portion of the Rayon Filament Warehouse.
- CMC began demolition of the remaining Power House structure. ACM was disposed of in the Class III landfill on-site and scrap metal was deconned and recycled.
- CMC had completed removing overhead pipes wrapped in TSI from the Rayon Filament Warehouse. Additional removal of TSI had to be conducted on or about August 26 and September 13, 2013.
- CMC continued removal of ACM from trenches and shallow channels associated with the Power House.
- CMC continued scraping surface soil to remove residual ACM.
- TetraTech continued visual inspection and clearance of grids. TetraTech also continued to provide perimeter air sampling and Site documentation.

POLREP No. 20 – REMOVAL OF TSE FROM WAREHOUSE AND T&D OF DRUMMED WASTE

Date:	10/31/2013
Reporting Period:	4/01/13 to 6/30/13

ERRS began removing overhead pipes wrapped in TSI from the Rayon Filament Warehouse. Removal of the pipes was completed on June 28, 2013.
ERRS asbestos abatement subcontractor performed glove-bag removal of TSI from warehouse downspouts and completed it on May 23, 2013.
ERRS provided hazard categorization and bulking of over 300 staged drums and containers. CMC provided disposal, recycling, or reuse of twenty-one refrigerant cylinders, damaged lead acid batteries, a drum of a hydrofluoric acid solution, a drum of potassium persulfate, three drums of sodium hydroxide, and numerous other drummed waste, a pallet of PCB ballasts, and a roll-off box of hazardous solids.
ERRS continued removal of ACM from trenches and shallow channels around foundations.
ERRS continued scraping surface soil to remove residual ACM.
ERRS continued decontamination and recycling of scrap metal.
Lynne McCoy with Wildlife Rehabilitation was on-site June 19, 2013, to identify the bird of prey nesting on a structure next to the Power House. She identified it as an Osprey.
START continued visual inspection and clearance of grids. START also continued to provide perimeter air sampling

and Site documentation.

POLREP #19 – ACM DEBRIS REMOVAL CONTINUES

Date:	9/26/2013
Reporting Period:	1/01/2013 - 3/31/2013

Removal of ACM debris and glove-bagging every 20 feet and plastic wrapping of the elevated pipe runs throughout the Site and within the partially demolished Rayon Filament Warehouse that are identified as asbestos-containing TSI continues. An asbestos abatement subcontractor was hired to supplement ERRS work on the elevated pipe runs.

The Site was demobilized for the Easter Holiday. There is also a lack of funding due to the budget sequestration.

Highlights during this reporting period:

ERRS continued removal of ACM from basement sub-structures to the landfill.
ERRS began cutting segregated rebar pile for recycling.
ERRS asbestos abatement subcontractor began erecting scaffolding around the afterburner in preparation for gross removal of deteriorated TSI from the afterburner on January 22, 2013. Gross removal began on February 7 and was completed on February 14, 2013.
START continued visual inspection and clearance of grids.
ERRS began removing partially demolished portions of the Rayon Filament Warehouse, mostly consisting of detached steel beams and other structural members on January 31, 2013.
ERRS began removal of 20 foot sections of overhead pipe bearing TSI on February 12 and completed removal on March 27, 2013.
ERRS continued removal ACM from trenches and shallow channels around foundations.

POLREP #18 – ACM DEBRIS REMOVAL CONTINUES

Date:	8/8/2013
Reporting Period:	9/29/12 to 12/31/12

Removal of ACM debris and glove-bagging every 20 feet and plastic wrapping of the elevated pipe runs throughout the Site and within the partially demolished Rayon Filament Warehouse that are identified as asbestos-containing TSI continues. An asbestos abatement subcontractor was hired to supplement ERRS work on the elevated pipe runs.

Highlights during this reporting period;

ERRS resumed moving ACM from basement sub-structures to the landfill.
START collected accumulated groundwater samples from on-site basement sub-structures on October 12, 2012.
START completed mapping of property boundaries for Lowland Industrial Complex, LLC, according to the survey description in the property deed. Some overhead pipe encased in deteriorated TSI on the south side of the Site was discovered to be outside the previously recognized property boundary.
ERRS deconned drums and containers and staged them outside the asbestos exclusion zone for sampling and bulking activities.
ERRS continued removing ACM from vegetated areas of the Site. START continued visual inspection and clearance of grids.
START sampled visually stained soil for PCBs in Grid H-7.
ERRS began ACM and debris removal within the partially demolished Rayon Filament Warehouse on November 7, 2012.
ERRS asbestos abatement subcontractor began glove-bag work in the partially demolished Rayon Filament Warehouse on November 28, 2012.
ERRS continued removal ACM from trenches and shallow channels around foundations. Removal of debris from basement sub-structures limited to material above the groundwater level on December 20, 2012.

POLREP No. 17 – DEBRIS REMOVAL PROGRESS AND CEILING INCREASE

Date:	7/24/2013
Reporting Period:	6/9/2012 to 9/28/2012

Removal of ACM debris and glove-bagging every 20 feet and plastic wrapping of the elevated pipe runs that are identified as asbestos-containing TSI continues. ACM debris in close proximity to basements is being pushed into the basements to minimize exposure in anticipation of a funding shortfall.

Highlights during this reporting period;

ERRS moved the perimeter snow fence on the northeast side to encompass the overhead pipe racks leased by Mike Ball on June 14, 2012. Access was obtained by EPA.
ERRS continues to move ACM to the landfill and glove-bag deteriorated TSI
A fire occurred at the Alumasal, LLC, plant on June 15, 2012
START collected wastewater and sludge samples from on-site clarifiers on June 21, 2012
START collected sediment samples from NPDES Outfalls on June 27, 2012
START logged drums and containers in remaining structures on-site beginning July 10, 2012
START collected surface water samples at NPDES Outfalls on July 12, 2012
ERRS began removing ACM from vegetated areas beginning with the northwestern portion of the Site
EPA meets on-site with TDEC, CMC, and Tetra-Tech to discuss the path forward on July 18, 2012
START began visual inspection and clearance of grids on July 30, 2012
ATMOS cut off gas service to Alumasal, LLC, due to delinquency on July 30, 2012
OSC provided a site tour to the Morristown Fire Department on-site July 31 and August 1, 2012
START collected bulk asbestos samples from the Alumasal, LLC, plant on August 14, 2012

ERRS began ACM removal next to the partially demolished Rayon Filament plant on August 16, 2012
ERRS began to remove ACM from trenches and shallow channels around foundations running throughout the Site on September 19, 2012
EPA approved a Ceiling Increase and Change in Scope Action Memo on September 26, 2012
ERRS began removing accumulated ACM from basement structures on September 27, 2012

POLREP No. 16 – ONGOING ACM DEMOLITION DEBRIS DISPOSAL

Date:	6/8/2012
Reporting Period:	4/21/2012 to 6/8/2012

Removal is ongoing with primary focus on transfer of ACM demolition debris, bagged ACM material located in Electrical Shop building, and glove-bag or plastic wrapping of the elevated pipe runs that are identified as ACM insulated wrap to the on-site landfill/repository for ACM waste.
In lieu of a possible funding shortfall or operations demobilization, the recommendations that the Bureau of Reclamation (BOR) provided from their March 2012 site visit/assessment was a contingency to reduce the ACM source contamination in the three primary areas:

- A) Remove the bagged waste contained in the Electrical Equipment building and dispose in the on-site landfill (repository).
- B) Seal and remove the elevated pipe runs that are thermos-insulated with ACM that are identified as weathered or deteriorated, and
- C) Remove as much of the remaining ACM demolition debris, as practical, and present the remaining debris away from the fence line that cannot be transported to the on-site landfill.

POLREP No.15- ONGOING REMOVING ACM DEMOLITION DEBRIS AND BAGGED ACM

Date:	4/20/2012
Reporting Period:	3/22/2012 to 4/20/2012

Removal ongoing with primary focus on removal of ACM demolition debris to on-site disposal and removal and on-site disposal of bagged ACM material located in Electrical Shop building.

EPA initiated emergency response action in April 2010 to stabilize site and control access. Subsequent ceiling increase action memorandums (June 2011 & March 2012) have maintained EPA presence to complete removal of source contamination (ACM contaminated debris, bagged ACM insulation from RP abatement), and existing pipe runs wrapped with insulation (in deteriorating condition) that is ACM.

POLREP No. 14 – REMOVAL CONTINUES UNDER FUNDING INCREASE

Date:	3/21/2012
Reporting Period:	2/4/2012 to 3/21/2012

ERRS continues transferring ACM debris to the on-site landfill (See Progress Metrics below). START continues to manage 8 perimeter air monitoring for asbestos around the immediate hot-zone of the former plant structures. The perimeter of the hot-zone is approximately 1.25 miles and includes the power house and the former rayon manufacturing buildings which are 90% demolished or partially demolished and the rubble piles contain asbestos.

On March 13, 2012 the Region 4 Superfund Division Director and Deputy Director was briefed on the current status of the removal action, site issues and proposed removal strategies moving forward. The briefing was hosted by the OSC and attended by members of the Enforcement Team, ERRB Chief, and a representative from the Agency for Toxic Substances and Disease Registry (ATSDR).

The proposed budget and ceiling increase was approved by the Director and is the fourth (4th) modification to date on Task Order No. 115 and issued on March 20, 2012 that will continue to fund the ongoing removal work. The Scope of Work was expanded to include removal of deteriorating jacketed (ACM containing) insulation on elevated pipe/plumbing runs that are located in and around exposed partially demolished buildings. There is also bagged asbestos and asbestos contaminated material (ACM), staged in the former electrical shop by former contract workers for the responsible party (RP). ERRS was tasked to transferred the bagged ACM waste to the on-site landfill. The debris removal that began in January 2012 has allowed easy and safer access to the pipe/plumbing runs. However, debris removal will continue as access to deteriorating and damaged pipe/plumbing runs are still limited in several areas of the site. The Emergency and Removal Branch (ERRB) Branch Chief and two representatives from the U.S. Bureau of Reclamation (BOR) conducted a site walk with the OSC to observe site operations and discuss removal goals and production efficiencies to be implemented under the new funding modification. The ERRB Health and Safety OSC also conducted a follow up site visit to address the February 2012 health and safety audit and also advise ERRS and the Superfund Technical Assessment and Response Team (START) contractor on the technical details regarding future (high hazard) removal operations involving the ACM pipe/plumbing removal.

POLREP No. 13 – LANDFDILL OPENS/ ACM DEBRIS DISPOSAL OPERATIONS BEGINS

Date:	2/3/2012
Reporting Period:	11/30/2011 to 2/3/2012

November 30 through December16: ERRS completed the final phases of the on-site disposal cell construction. Perimeter berms were shored and installation of a subsurface drainage (approximately 700-feet) was completed. The drainage line (26-in diameter) was a diversion of a concrete line that runs diagonally under the middle of the former pond. TDEC regulations prohibit plumbing/drainage structures under landfills. Additionally, 200-yards of access road was amended from the powerhouse and into the landfill to accommodate heavy equipment traffic and delivery of

debris scheduled to begin within the first few weeks of 2012. START and ERRS continued final review and modification of the site work plan specific to asbestos work and the "clean grid strategy" that will take work across the site from west to east closing out grids (200-ft X 200-ft.) as each area is cleaned.

January 10 to present: ERRS began debris hauling operations to the landfill. The START initiated perimeter (8-locations) air monitoring for asbestos around the immediate hot-zone of the former plant structures. The perimeter of the hot-zone is approximately 1.25 miles and included the power house and the former rayon manufacturing buildings which are 90% demolished or partially demolished and the rubble piles contain asbestos.

The OSC is currently working on a *Ceiling Increase & Change of Scope Action Memorandum* to request additional funding to continue the removal operations. The change of scope will focus the removal operations more heavily on the concentrated areas of ACM debris and elevated pipe-runs that are jacketed with asbestos insulation and borders the businesses on the south side of the Lowland Complex.

POLREP No. 12 – LANDFILL CONSTRUCTION

Date:	11/29/2011
Reporting Period:	7/7/2011 to 11/29/2011

August 8-12, 2011: ERRS subcontractor Resolution, Inc. conducted training in Nicholasville, KY (CMC) to comply with 29 CFR **1926**.1101 for asbestos workers.
August 15, 2011: With verbal access from the RP, EPA and ERRS (CMC, Inc) conduct initial mobe to site under the Action Memorandum - *Request for a Ceiling Increase and Exemption from the Twelve Month Statutory Limit and $2 Million Exemption for a Time-Critical Removal Action* (signed June 20, 1011).
August 15 - Sept 15: Complete installation of site offices, utilities infrastructure and decontamination trailers & bays. TDEC, RPPs (Mark Sawyer and Eddie Whelan) & EPA OSC come to an agreement that the retention pond area is the best choice for the on-site landfill. Grubbing and preparation work begins in proposed landfill area. ERRS dewaters pond.
September 22, 2011: Access Letter formally signed by PRP Mr. Mark Sawyer
September 26 - 30, 2011: Geotechnical work (soil borings) conducted in the area of the proposed landfill.
November 7 - 9, 2011: Subcontracted survey crew conducts work on-site in landfill area.
November 14 - 18, 2011: START conducts background sampling in work areas.
November 21 -25, 2011: Personnel demobilization for Thanksgiving

POLREP No. 11 - 7/6/2011: ADDITIONAL REMOVAL FUNDING APPROVED

Date:	7/6/2011
Reporting Period:	6/2/2011 to 7/6/2011

During the week of June 27th, the OSC received concurrence and approved Regional funding from EPA Headquarters to continue removal operations at the site. Approval was necessary under current EPA regulations governing asbestos removals of “national significance”.

A Task Order and Scope of Work to continue site operations was recently issued to the ERRS contractor. On site meetings are scheduled for the week of July 11th with the ERRS project manager and TDEC officials to discuss plan of action including the pending approval of on-site disposal.

Site security continues on a 24/7 basis

POLREP No. 10 – ADDITIONAL SITE FUNDING AND EPA HQ CONCURENCE

Date:	6/1/2011
Reporting Period:	3/11/2011 to 6/1/2011

During the week of May 23rd, the OSC drafted an Action Memorandum to include a funding increase to continue site operations. The OSC and Enforcement Team briefed the Region 4 Superfund Director and funding was approved pending concurrence from EPA headquarters under current regulations governing asbestos removal projects.

Site security continues on a 24/7 basis pending future site work.

POLREP No. 9 – EPA CONTINUES TO EVALUATE LANDFILL OPTIONS

Date:	3/10/2011
Reporting Period:	2/3/2011 to 3/10/2011

During the week of March 7th, the OSC requested that TDEC review closure plans from the existing landfills immediately adjacent to the site and found that the former Lenzig Fibers landfill apparently has three acres of usable capacity for asbestos and demolition debris. The OSC and TDEC met with the City of Morristown officials to discuss future plans for the site.

Region 4 Office of Regional Counsel continues review of PRP bankruptcy review and enforcement.

Site security continues on a 24/7 basis pending future site work.

POLREP No. 8 – EPA REGONAL COUNSEL REVIEW BANKRUPTCY & DEED INFORMATION

Date:	2/2/2011
Reporting Period:	12/14/2010 to 2/2/2011

START releases Final Assessment Removal Report on January 17, 2011 (January 18-22, 2010 multi-media sampling event). Supports asbestos within debris piles at the site and identified contents of orphan drums/containers

throughout the site. Raw data from this report was reviewed by the Region 4 Technical Services Section (TSS) during the Emergency Response Action in April 2010.

The OSC continues to coordinate the next step of landfill placement and construction with TDEC and Morristown officials. Region 4 Office of Regional Counsel (ORC) is currently reviewing the potential responsible parties (PRPs) deed and bankruptcy information from the Liberty Fibers Bankruptcy Decree during the late 1990's. Placement of the desired ACM landfill is dependent on the ownership of available land on the 400 acre site and working with Region 4 Enforcement Branch to come to an amenable and desired resolution for all parties.

Site security continues on a 24/7 basis pending future site work.

POLREP No. 7- SITE STABILIZATION & SECURITY CONTINUES

Date:	12/13/2010
Reporting Period:	11/30/2010 to 12/13/2010

ERRS continued spraying asbestos contaminated debris piles with polymer based lock down agent. Errs also replaced weathered polyethylene frame windows of the asbestos containment building with reinforced polyethylene in preparation for winter weather. ERRS also continued enhancing security measures along the perimeter of the site with additional steel cable and high visibility fencing. Approximately 5000 feet of high visibility fencing has been used to delineate asbestos contaminated areas.

In preparation for colder weather, ERRS insulated waterlines to the decontamination trailer and above ground waterline connections and backflow regulators. ERRS also continue to assist the OSC with asbestos disposal options by pursuing possible disposal at local landfills in the area. The cost of disposing of approximately 400,000 cubic yards of friable asbestos off site will most likely be prohibitive from preliminary estimates from those disposal facilities.

Security continues to monitor the site during non-working hours and holidays.

POLREP No. 6 - SITE STABILIZATION & SECURITY CONTINUES

Date:	12/1/2010
Reporting Period:	11/1/2010 to 11/30/2010

EPA continues to maintain presence and security at the site in preparations for removal operations. ERRS continued applying polymer based lock-down agent to ACM contaminated debris piles. ERRS also continue enhancing security measures along the perimeter of the site with steel cable and high visibility fencing and erecting warning signage.

EPA and ERRS continues to pursue on-site disposal options for the estimated 400-cubic yards of ACM debris. A local newspaper reported that the owner of Lowland Recycling attempted to get property behind the site approved for a landfill but that county officials turned down his proposal.

POLREP No.5 - SITE STABILIZATION & SECURITY CONTINUES

Date:	11/29/2010
Reporting Period:	9/15/2010 to 11/29/2010

EPA continues to maintain a presence at the site with ERRS and security while pursuing and evaluating options for on-site disposal of ACM debris. ERRS continued ACM containment measures and completed construction of a waterline to the site decontamination trailers. Local inspectors approved the waterline installation after the backflow prevention box was raised to above ground according to local code and ease for inspection.

ERRs contractors decontaminated an excavator on site which was owned by a Florida equipment rental company and formerly operated by Lowland Recycling. After confirmation of the ownership of the equipment, it was released back to the owner for demobe.

POLREP No. 4 – SITE STABILIZATION & SECURITY CONTINUES

Date:	9/14/2010
Reporting Period:	7/15/2010 thru 8/30/2010

In late July, 2010, a BASF landfill trustee reported that the PRP's contractor was suspected of performing work on site during a temporary shutdown of site cleanup activities. The OSC received additional funding to maintain security on site as well as continue mitigation of the asbestos contamination operations.

Beginning on August 3rd, ERRS enhanced security at seven access points along the perimeter of the 350 acre site. Concrete "jersey barriers" and steel cable fencing were installed at vulnerable access points and security was reorganized to more effectively manage access within the site and in/out of perimeter fencing. ERRS also continued asbestos containment measures and completed construction of a waterline to the site decontamination trailers. The local municipality inspected and approved the water service after slight modifications to the pressure reduction box were made.

ERRS continues to consult with the OSC over on-site and off-site disposal options. At this time, off-site disposal of an estimated 400,000 cubic yards of ACM waste from the debris field at the site is cost prohibitive and focus continues on on-site disposal.

POLREP No. 3 - EMERGENCYASBESTOS CONTAINMENT MEASURES CONTINUES

Date:	7/13/2010

Reporting Period: 6/01/2010 thru 6/30/2010

Throughout June 2010 ERRS contractors continued applying a polymer based lock down agent (811E Lockdown Encapsulant®) to piles of demolition/salvage debris identified as containing ACM. The lock down agent provides a film over the piles that prevents asbestos fibers from becoming airborne effective for several months. The OSC tasked ERRS, with concurrence from the Tennessee Department of Environment and Conservation (TDEC) to evaluate property located to the east of the Power House that was formerly used by BASF for production waste landfill as well as coal ash impoundment that may be further developed as a landfill to accommodate ACM disposal.

POLREP No. 2 – EMERGENCYASBESTOS CONTAINMENT MEASURES CONTINUES

Date: 7/13/2010
Reporting Period: 5/01/2010 thru 5/28/2010

Throughout May 2010, ERRS contractors initially established a hot zone perimeter around the obvious areas of demolition and debris piles in order to gain some control over potential friable asbestos areas. This former rayon plant has several areas where subsurface structures, manholes and sewer systems were established presumably to run cooling and discharge water from production areas. ERRS were initially tasked with marking those subsurface structures for safety purposes.

ERRS contractors then established a decontamination zone outside the perimeter and arranged to run a temporary waterline from Enka Road (approximately 100yds) to the decontamination trailer. The primary threat driving this removal action is the presence of friable asbestos, therefore our next step was to begin applying a "lock down agent" to the debris piles containing friable asbestos utilizing Level C protection. The vast majority of friable asbestos on site is located near the former powerhouse and debris piles along the northern third (approximately 100 acres) of the site. ERRS contractors have estimated that the site contains 400,000 cubic yards of asbestos contaminated building demolition debris.

POLREP No. 1 - INITIAL – EMERGENCY ACTIVATION TO CONTAIN FRIABLE ASBESTOS

Date: 4/21/2010

EPA, and contractor support from the Emergency Rapid Response Service (ERRS) and Superfund Technical Assessment and Response Team (START) mobilize to the site to investigate and stabilize the scene involving piles of salvage debris containing asbestos containing materials (ACM). Site security was also established at the site.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)
PRPs have been identified and enforcement is ongoing. Notice Letters were mailed to Jolley Rock Investments, LLC, and Paint Oak, LLC, on September 25, 2013.

2.1.4 Progress Metrics
Note: Volumes or weights are estimates due to the natue of the material. The number of articulated dump loads of ACM transported to the landfill is tracked on a daily basis.

Waste Stream	***Medium***	***Quantity***	***Manifest #***	***Treatment***	***Disposal***
Asbestos-Containing Material (ACM)	Demolition Debris	7,313 loads	N/A	Landfill	Class III Landfill On-Site
Bagged ACM (Electrial Equipment Building)	Friable asbestos insulation from previous abatement activity	20,561 bags	N/A	Landfill	Class III Landfill On-Site
Glove-Bagged TSI CMC	Overhead Pipe Runs	304 bags	N/A	Landfill	Class III Landfill On-Site
Glove-Bagged TSI NEO Corporation	Overhead Pipe Runs	4,201 bags	N/A	Landfill	Class III Landfill On-Site
TSI Pipe Removed	Overhead Pipe Runs	37,508 lf	N/A	Landfill	Class III Landfill On-Site
Tires	Solid		N/A	Landfill	Class III Landfill On-Site

PCB Ballast	Solid	788 lbs	0110488627JJK	Landfill	Lamp Environmental Industries (LEI), Inc. - Hammond, LA
Hazardous Waste, NOS	Solid	16,165 lbs	011147706JJK	Landfill	American Environmental Services, Inc. Calvert City, KY
Hazardous Waste, Acidic	Liguid	4 drums	011147721JJK	Neutralization	American Environmental Services, Inc. Calvert City, KY
Hazardous Waste, Basic	Liquid	3 drums	011147721JJK	Neutralization	American Environmental Services, Inc. Calvert City, KY
Hazardous Waste, Oxidizer	Solid	1 drum	011147721JJK		American Environmental Services, Inc. Calvert City, KY
Compressed Gas Cylinders	Gas	32 cylinders	010659334JJK		Tradebe Treatment and Recycling, LLC East Chicago, IN
RCRA Empty Drums	Solid	18 tons	1028439	Landfill	Carter Valley Landfill Church Hill, TN
Talc and silica powders and unused products	Solid	18 tons	1297220	Landfill	Carter Valley Landfill Church Hill, TN
Caustic Solids (Sodium Hydroxide)	Solid	12 tons	00001	Landfill	American Environmental Services, Inc. Calvert City, KY
Recycleable	***Medium***	***Quantity***	***Manifest #***	***Treatment***	***Disposal***
Scrap Metal	Rebar and structural steel from demolition activity	1,818.67 gross tons			Recycle Tennessee Metals Company
Refrigerant	Gas	7 cylinders	BOL LF5212013		Southern Global Refrigeration Morristown, TN
Propane	Gas	12 cylinders	BOL 051613		Holston Gases Morristown, TN
Used Oil	Liquid	1 tote	011147720JJK		American Environmental Services, Inc. Calvert City, KY

Universal Waste (Fluorescent Lamps)	Solid	2,278 lamps	BOL 4330218		USA Lamp & Ballast Recycling Cincinnati, OH
Universal Waste (Lead Acid Batteries)	Solid	3,364 lbs.	BOL K058673		Battery Solutions Howell, MI

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

No further response activities anticipated at this time by EPA.

2.2.1.2 Next Steps

Referral of the Site back to TDEC

2.2.2 Issues

None at this time.

2.3 Logistics Section

The OSC assumed this role

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

The OSC assumed this role.

2.6 Liaison Officer

The OSC assumed this role

2.7 Information Officer

The OSC assumed this role

2.7.1 Public Information Officer

The OSC assumed this role

2.7.2 Community Involvement Coordinator

Kyle Bryant

3. Participating Entities

3.1 Unified Command

N/A

3.2 Cooperating Agencies

Over the period of this removal action:

USEPA Region 4

EPA Environmental Response Team

US Bureau of Reclamation

Tennessee Department of Environment and Conservation

Morristown Fire Department

4. Personnel On Site

FOSC Perry Gaughan - April 19, 2010 thru June 30, 2011
FOSC David Andrews - July 1, 2011 thru June 8, 2012; **October 19, 2015 thru April 29, 2016**
FOSC Karen Buerki – June 11, 2012 thru October 16, 2015

START - Tetra Tech, Inc..(December 21-22, 2015)

1 - Environmental Scientist

ERRS - CMC, Inc. (April 26-29, 2016)
1 Response Manager

1 Equipment Operator

2 Laborers

5. Definition of Terms

ACM – Asbestos Containing Material or Substances

Asbestos - Refers to a set of six naturally occurring fibrous minerals. Asbestos has six primary sub-classifications: chrysotile, crocidolite, amosite, anthophyllite, tremolite, and actinolite. Among these, chrysotile and amosite asbestos are the most common.

BOR – US Bureau of Reclamation

EPA – Environmental Protection Agency Region 4

ERRPB – Emergency Response, Removal and Prevention Branch (formerly ERRB)

ER – Emergency Response

ERRS – Emergency Rapid Response Service (Environmental Restoration, Inc. & CMC, Incorporated)

ERT – USEPA Environmental Response Team

f/cc – Fibers per cubic centimeter

OSC – Federal On-Scene Coordinator

PRP – Potential Responsible Party

RML – Regional Removal Management Level

RSE – Removal Site Evaluation

SOSC – State On-Scene Coordinator

START – Superfund Technical Assessment and Response Team (Tetra Tech, Inc)

TDEC – Tennessee Department of Environment and Conservation

TSI - Thermal System Insulation

TSS – Region 4 Technical Services Section (Resource & Scientific Integrity Branch/ REG 4 Superfund Division)

6. Additional sources of information

6.1 Internet location of additional information/report

https://www.epaosc.org/libertyfib

6.2 Reporting Schedule

7. Situational Reference Materials

No additional reference materials