

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #23
Progress - Activity Based Sampling
Liberty Fibers
B457
Morristown, TN
Latitude: 36.1493481 Longitude: -83.2048083

To:
From: Karen Buerki, On-Scene Coordinator
Date: 5/30/2015
Reporting Period: 4/1/2014 to 5/30/2015

1. Introduction

1.1 Background

Site Number:	B457	Contract Number:	EP-S4-07-02
D.O. Number:	Mod 0015	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:		Completion Date:	
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

A multimedia inspection was conducted 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

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/decontaminated and recycled.

2.1.2 Response Actions to Date

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.

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 nature 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 (Electrical 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	Liquid	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
					Southern

Refrigerant	Gas	7 cylinders	BOL LF5212013		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

Based on the pending data from the ABS, determine if further action at the Site is indicated.

2.2.1.2 Next Steps

OSC to coordinate with the property manager (acting on behalf of the PRP) on final site restoration to be conducted at the Site.

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

April 26-29, 2016

1 EPA OSC David Andrews

START - Tetra Tech, Inc.

Paul Prys, Environmental Scientist (December 21-21,2015 site visit)

ERRS - CMC, Inc.

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.epaosoc.org/libertyfib>

6.2 Reporting Schedule

7. Situational Reference Materials

No additional reference materials