

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Friday, March 10, 2006

From: Steve Spurlin

Subject: LWD, Inc.

2475 Industrial Parkway, Calvert City, KY

Latitude: 37.0469000

Longitude: -88.3320000

POLREP No.:	2	Site #:	A4LQ
Reporting Period:	3/6/2006 - 3/10-2006	D.O. #:	
Start Date:	3/2/2006	Response Authority:	CERCLA
Mob Date:	3/6/2006	Response Type:	Emergency
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Assessment
CERCLIS ID #:	KYD088438817	Contract #	
RCRIS ID #:			

Site Description

The LWD facility is a former hazardous waste incinerator that began operation in the early 1970's and received it's last shipment of hazwaste in early 2003. The site was referred to ERRB via the State of Kentucky for possible removal action in February 2006. Upon review of the facility, the OSC noticed that the containment area surrounding a tank farm on the north end of the facility was becoming full of collecting rainwater. The rainwater was mixing with oils and other chemicals in the containment area to produce a hazardous waste. At the time of inspection, the waste was approx. 4' deep and only 3' from overtopping the containment area walls. An emergency response was initiated to address the tank farm. The ER will consist of pumping the water out of the containment area, cleaning the cement, and stabilizing the tanks for any leaks. The last step will be to provide an avenue for the collecting water to be kept out of the containment area.

At the same time, a removal assessment is taking place at the facility to address the future removal needs and enforcement process.

Current Activities

The following activities took place during the reporting period:

ER Phase:

During the reporting period, ERRS crews have been continuously pumping water from the containment area as well as from three other cells that drain into the larger area. To date, approximately 130,000 gal of contaminated water have been pumped into frac tanks on site. During the middle of the week crews were able to get to the floor of the containment areas and squeegee and pressure wash a good portion of the floor. Because of the weather forecast for the area during the week, it was decided to focus on getting upper containment cells (which are smaller, but ultimately drain into the larger cell) clean to prevent contaminated water from pouring into the larger cell. This was accomplished during the day on March 9. On March 9, the area received significant rainfall and this caused the large containment area to collect around 6" of water that will need to be pumped. A sample was also taken from the frac tanks that are being used for storage to determine future disposal options.

Removal Assessment Phase:

Removal assessment activities were able to be completed during this reporting period. START took waste and water samples from tankers, roll-offs, holding tanks, and sludge on site for analysis. A pH was also taken from an AST on site that is thought to hold caustic product and came back at 13. Also, pH readings were taken from each roll-off stored outside. This is to aid in possible disposal options later on.

Planned Removal Actions

The planned activities for the next reporting period:

- Continue to pump from the containment area.
- Once the water has been removed, pressure wash all surfaces to prevent future contamination.
- Secure all leaking tanks and tankers on site.
- START will begin going through the facility and conducting a photo log as well as begin to look at labels that are on drums and roll-offs.

Next Steps

Once the sample analysis is completed, a disposal option for the water on site will have to be created. Several options are being considered including releasing it to the local POTW, releasing it to a landfill on site, or sending it off for disposal elsewhere.

Key Issues

There are several key issues at this facility:

- The tanks that are in the tank farm are sitting on top of fire bricks, not the ground. This poses a concern in that oil and other hazardous waste is suspended in between those bricks which makes it hard to clean. This will have to be address in the future.
- Over the weekend (3/11 - 3/13) it is expected to rain in the Calvert City area. This creates more water that needs to be pumped into frac tanks and disposed of. Also, when the water gets too high, it makes pressure washing more difficult.
- When it rains at this facility, not only does the containment area fill with water, but due to the structural integrity of the incinerator building, the inside of that building floods as well, making it difficult to conduct operations inside the building.

response.epa.gov/LWD