

**United States Environmental Protection Agency
Region IV
POLLUTION REPORT**

Date: Wednesday, August 30, 2006

From: David Andrews

To: Karen Colemaan, Superfund Enforcement and
Information Management B

Subject: Final POLREP
Lustar Dye
144 Caribou Rd, Asheville, NC
Latitude: 35.3345000
Longitude: -82.3146000

POLREP No.:	2	Site #:	A4KA
Reporting Period:		D.O. #:	0206-F4-0037
Start Date:	7/19/2005	Response Authority:	CERCLA
Mob Date:	7/19/2005	Response Type:	Emergency
Demob Date:	8/3/2006	NPL Status:	Non NPL
Completion Date:	8/30/2006	Incident Category:	Removal Action
CERCLIS ID #:	NCP070706061	Contract #	
RCRIS ID #:			

Site Description

On July 19, 2005, NCDENR contacted EPA Phone Duty officer regarding an abandoned facility, Lustar Dye and Finishing, 144 Caribou Rd, Asheville, North Carolina. The facility, in bankruptcy, houses a variety of chemicals in 55 gallon drums, 5 gallon containers and 1000-3000 gallon tanks. Among the chemicals included are 50% Hydrogen Peroxide, 70% Sulfuric Acid, Hydrochloric Acid, Acetic Acid, caustics and pesticides. The fence surrounding the facility is unlocked, as well as some of the doors to the main building. NCDENR has indicated that there are some releases inside the building. NCDENR considers this site an imminent hazard and has requested the assistance of EPA. OSC Jim Webster was dispatched along with START contractors.

Current Activities

During the period between July 30, 2005 and May 2006, EPA Attorney's reconciled access issues with the Trustees of Lustar Dye & Finishing ("Site"/"Lustar"). EPA maintained site security from August 2005 through February 2006. During this period, Republic Textiles (a leaser of equipment to Lustar) expedited removal of their equipment from the property. A default on the property's water bill resulted in a cut-off of water service, followed by an ordered shut-down of power to the property (February 2006) by the City of Asheville's Fire Department (Fire Code Violation). ERRS (WRSIE) discontinued security to the site in March 2006. During the previous Fall/Winter months Region 4's Emergency Response & Removal Branch and their contract resources were in full deployment to the Hurricane Katrina in support of removal/recovery efforts in Coastal Alabama and Mississippi.

A Ceiling Increase Action Memorandum was signed in May 2006 and EPA demobilized from Alabama/Mississippi in June 2006. A return to complete the the removal phase of the Lustar project began on July 5, 2006.

ERRS Disposal Task included: 1-) Consolidate drummed, bulk, or uncontained residues of chemicals found within plant operations area or on facility property [per the Action Memorandum] that may have been used for or support the operations of this textile finishing facility. 2-) Prepare and ship waste or recyclable product(s) for off-site shipment and disposal.

From July 5 - 20, 2006 ERRS reconciled data collected from the July 2005 emergency response. The data included HAZCAT information that defined waste streams and analytical data that supported disposal profiles. A bid for disposal was accepted by EPA in the Fall of 2005. However, a reconsideration of the original Fall 2005 disposal bid was made to include a Non-Hazardous bulk stream. This decision would support a significant reduction in disposal cost and streamline the logistics of disposal on the numerous pre-existing waste streams.

From July 21 - August 3, 2006 ERRS segregated the drummed waste profiled for off-site disposal, shipped empty drums for recycling, bulked compatible Non-Hazardous liquids and solidified material in roll-offs, pumped out the No.6 oil 2nd containment area and shipped for disposal, pumped the bulk acetic acid bulk-tank and shipped off-site for disposal, & pumped out the sulfuric acid tank (used in WWT) and shipped off-site for disposal.

ERRS neutralized the concrete-constructed secondary containment structure for the Sulfuric Acid AST which serviced the facility's production effluent. Product had leaked into containment and had eroded through the wall and contaminated surrounding soil. ERRS used hydrated lime to neutralize the inside surface of the containment basin and worked dolomitic & hydrated lime to adjust soil pH above 4.0 (per pH test strip).

Prior to demobilization, ERRS secured the site/building and perimeter fence.

Planned Removal Actions

No Future Site Activity Planned.

Key Issues

* Access Agreement permitting disposal of waste. RP reviewed EPA's initial response documents [Jul/Aug '05] and waste inventory. Evaluated their options for disposal. Access delay was resolved over Winter months.

* EPA/ERRS re-evaluated original disposal plan for site waste and developed a strategy to significantly reduce disposal cost by solidifying the Non-Haz waste stream. Republic Textile, who leased equipment to Luster Dye & Finishing was able to ship the 50% Rayon/Caustic product (approx 2K-Gal) with equipment sale. The 35% Hydrogen Peroxide tank (stainless steel) and product was also shipped off-site in equipment sale.

* Due to leaks in the plant's ceiling, ERRRS had to shut down overhead florescent lighting due to shorts in the electrical circuits. All electrical feed to the plant [except fire alarms] was locked-out prior to demobilization.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$285,000.00	\$268,223.82	\$16,776.18	5.89%
RST/START	\$50,000.00	\$32,000.00	\$18,000.00	36.00%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$10,000.00	\$8,750.00	\$1,250.00	12.50%
Total Site Costs				
	\$345,000.00	\$308,973.82	\$36,026.18	10.44%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Disposition of Wastes

Summary of disposal is as follows: Sulfuric Acid (3,700 gal)recycled by vendor; Acetic Acid (1000 gal) recycled by vendor; No.6 Fuel Oil (2,500 oil/water mix) recycled by vendor; 4X Roll-Offs disposed to Subtitle-D landfill; 20XDM Org Liq (Tetrachloroethylene) Redistilled; The remaining 18 DM and 1 Pail disposed by chemical treatment/incineration or reuse/recycle. Approximately 40 drums recycled; Total cost of transportation & disposal: \$24,590.71 [out of ERRS budget]

Waste Stream	Quantity	Manifest #	Disposal Facility
Sulfuric Acid w/ >51% acid, 8, UN 1830, PG II	4,265 gal	Straight Bill of Lading	Lynx Chemical 1136 Chumar

			Street Columbus, GA 31904 706.576.2075
Corrosive Liquids, Flammable, n.o.s. (Acetic Acid), 8, UN2920, PG II	1,000 gal	Straight Bill of Lading	Lynx Chemical 134 Phalps Road S.E. Dalton, GA 30720 706.227.9000
Non Hazardous, Non-Regulated Solids	1 CM - 10-Tons	TS-001	Buncombe County Landfill 85 Panther Branch Road Alexander, NC 28701
Non Hazardous, Non Regulated Solids	1 CM - 15-Ton	TS-002	Buncombe County Landfill 85 Panther Branch Road Alexander, NC 28701
Non Hazardous, Non-Regulated Solids	1 CM - 15 Ton	TS-003	Buncombe County Landfill 85 Panther Branch Road Alexander, NC 28701
Non Hazardous, Non-Regulated Debris	1 CM - 30 Ton	TS-004	Buncombe County Landfill 85 Panther Branch Road Alexander, NC 28701
Waste Water, Non-Haz, Non-Regulated [No.6 Oil]	1 TT - 2,500 gal	TS-005	Vopak 3055 Main Street Mauldin, SC 29662 864.962.9953
Waste Corrosive Liquid, Acidic, Organic, n.o.s., 8, UN 3265, PG II [D008] Approval No. NC62563	1 DM, 500 lb	7286B	EQ - North Carolina 1005 Investment Blvd. Apex, NC 27502 919.363.4700
Waste Oxidizing Solid, n.o.s., 5.1, UN 1479, PG II [D001] Approval No. NC62564	1 DM, 50 lb.	7286B	EQ - North Carolina 1005 Investment Blvd. Apex, NC 27502 919.363.4700
Waste Oxidizing Liquids, n.o.s., (Potassium Permanganate), 5.1, UN3139, PG II [D001]	1 DM, 500 lb	7286A	EQ - North Carolina

Approval No. NC62537			1005 Investment Blvd. Apex, NC 27502 919.363.4700
Non Hazardous, Non Regulated Dye Solid Approval No. NC62540NH	1 DM, 500 lb.	7286A	EQ - North Carolina 1005 Investment Blvd. Apex, NC 27502 919.363.4700
Non Hazardous, Non Regulated Dyeing Assistant Approval No. NC62539NH	1 DM, 500 lb	7286A	EQ - North Carolina 1005 Investment Blvd. Apex, NC 27502 919.363.4700
Waste Corrosive Liquid, Acidic, Inorganic, n.o.s., (Sulfuric Acid, Hydrochloric Acid), 8, UN3266, PG II [D002] Approval No. NC62547	5 DM, 3000 lb	7286A	EQ - North Carolina 1005 Investment Blvd. Apex, NC 27502 919.363.4700
Waste Sodium Hydrosulfite, 4.2, UN1384, PG II [D001] Approval No. NC62546LB	2 DM, 200 lb	7286A	EQ - North Carolina 1005 Investment Blvd. Apex, NC 27502 919.363.4700
Waste Flammable Liquid, n.o.s., (Xylene, Methyl Ethyl Ketone), 3, UN1993, PG III [D001, D035] Approval No. NC62545	2 DM, 200 lb	7286A	EQ - North Carolina 1005 Investment Blvd. Apex, NC 27502 919.363.4700
Non Hazardous, Non Regulated Folic Acid Approval No. NC62535NH	1 DM, 500 lb	7286A	EQ - North Carolina 1005 Investment Blvd. Apex, NC 27502 919.363.4700
Waste Aerosols, Flammable, 2.1, UN1950 [D001] Approval No. NC62543	1 DM, 100 lb	7286A	EQ - North Carolina 1005 Investment Blvd. Apex, NC 27502 919.363.4700

Waste Corrosive Liquid, Basic, Inorganic, n.o.s., (Sodium Hydroxide), 8, UN3266, PG II [D002] Approval No. NC62542T	1 CF, 1000 lb	7286A	EQ - North Carolina 1005 Investment Blvd. Apex, NC 27502 919.363.4700
Hazardous Waste Liquid, n.o.s., (Tetrachloroethylene), 9, NA3882, PG III [D039] Approval No. NC62541	20 DM, 10,000 lb	7286A	EQ - North Carolina 1005 Investment Blvd. Apex, NC 27502 919.363.4700
Non Hazardous, Non Regulated Sodium Sulfate Approval No. NC62536NH	2 DM, 1000 lb	7286A	EQ - North Carolina 1005 Investment Blvd. Apex, NC 27502 919.363.4700
Empty Drums for Recycle/Reconditioning	40 X 55 gal	N/A	M&M Steel Drum Recycling 124 Drum Hill Drive Canton, NC 28716- 0090

response.epa.gov/lustardye

POLREP #2 Last Updated 11/14/2007