

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Tuesday, October 31, 2006

From: Steve Spurlin

To: Jim McGuire, USEPA - Region IV

Subject: LWD, Inc.

2475 Industrial Parkway, Calvert City, KY

Latitude: 37.0469000

Longitude: -88.3320000

POLREP No.:	9	Site #:	A4LQ
Reporting Period:	10/8/06 - 10/31/06	D.O. #:	46
Start Date:	3/2/2006	Response Authority:	CERCLA
Mob Date:	3/6/2006	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	KYD088438817	Contract #	68-S4-02-04
RCRIS ID #:			

Site Description

Please refer to previous POLREPs for site description and previous actions taken.

Current Activities

The following activities took place during the reporting period:

Operation of the wastewater treatment system (WWT) was performed throughout this period. Approximately 694,000 gallons have been treated by the WWT system. Treated water is being used for decontamination operations and/or being land applied. The cutting up of roll-offs was continued using a Komatsu PC 200 LC with a shear attachment. On October 12, 2006 began dismantling and cutting up tanks located in the North Tank Farm (NTF). Metal pieces were decontaminated and placed in a trailer for recycling at a scrap facility using a Caterpillar 320C L with a grappler attachment. Approximately 77 tons of metal was recycled with approximately 159 tons having been recycled to date. Mechanical demolition of piping, valves, and pumps within the containment areas is being continued. Piping is being cut into manageable pieces; pumps and valves are being disassembled; and all components are being decontaminated prior to being placed in a trailer for recycling at a scrap facility. There was approximately 48,700 gallons of hazardous waste liquids transported to an off-site incinerator for disposal during this period of time. To date there has been approximately 100,000 gallons of hazardous waste liquids transported to an off-site incinerator for disposal. 206 drums (various sizes) and 13 totes (various sizes) were sampled and tested for hazard categorization. This waste will be bulked into approximately 4 different waste streams which will then be profiled for disposal. Samples from storage tanks continue to be taken as needed for characterization purposes.

Planned Removal Actions

The following activities are planned during the next reporting period:

The mechanical demolition of piping, valves, and pumps will be continued. The cutting up of roll-offs and tanks will be continued. Demolition of piping and valves on the two caustic towers will be continued. Bulking of the hazard waste from the drums and totes will begin. Transportation and disposal of on-site hazardous waste will be continued.

There are approximately 200 drums and containers that remain on site inside the drum storage warehouse. To prevent spill migration, all drums will continue to be checked daily for leaks and bulges and will be over-packed as necessary.

Next Steps

The following have been identified as next steps in the stabilization phase of this removal action:

Preparations will continue so that the NTF can be completely dismantled along with the two caustic

towers. The waste and sludges in the tanks will be removed and staged for characterization and disposal. The tanks will then be cut up, decontaminated, and the steel will be recycled.

The south sump area, in the roll-off staging area, has been bermed and will continue to be the location for cutting and cleaning of the roll-off boxes.

Key Issues

Weather continues to pose problems at the Site. Electrical storms and/or heavy rains causes delays or suspension of work. Intermittent rain events which impacts the wastewater treatment system with an increased volume of water to be processed. The arrival of colder weather requires more time at end of each day to prevent pumps and hoses from freezing up.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$2,000,000.00	\$1,480,000.00	\$520,000.00	26.00%
IAG - BOR	\$95,000.00	\$52,000.00	\$43,000.00	45.26%
RST/START	\$130,000.00	\$59,000.00	\$71,000.00	54.62%
ERT	\$40,000.00	\$13,000.00	\$27,000.00	67.50%
Intramural Costs				
Total Site Costs	\$2,265,000.00	\$1,604,000.00	\$661,000.00	29.18%

* 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.

response.epa.gov/LWD

POLREP #9 Last Updated 11/9/2006