

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Friday, March 2, 2007

From: Jose Negron

To: Jim McGuire, ERRB

Subject: Continuation of Removal Actions
Cannon Road Drum Site
148 Cannon Road, Social Circle, GA
Latitude: 33.6525200
Longitude: -83.7206200

POLREP No.:	5	Site #:	A4PM
Reporting Period:		D.O. #:	0053
Start Date:	1/16/2007	Response Authority:	CERCLA
Mob Date:	1/16/2007	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	GAN000409893	Contract #	
RCRIS ID #:			

Site Description

The Cannon Road Drum Site (formerly Social Circle Cotton Mill) is located at 148 Cannon Road in the city of Social Circle in Walton County, Georgia. The site coordinates, as measured from the front entrance to the property, is N 33.65252 Latitude by W 83.72062 Longitude. The site is bordered on the south and west by residential homes and on the north and east by a railroad and an overgrown field, respectively. Many of the old mill houses along the western and southern sides of the site are still occupied.

The Social Circle Cotton Mill operated at the site from 1901 until 1982. The mill manufactured bed sheeting made from 35% cotton and 65% polyester. During its peak the mill employed 225 workers. In April 1994, the mill's main structure was severely damaged by fire. Less than half of the 3-story brick structure remains standing today. There are also several support buildings for the mill in varying stages of decay on the 3.84-acre site.

The site was referred to EPA by the city of Social Circle. Records indicate the property has been leased for various types of business use. The most recent tenant used the property to store several thousand containers of mixed hazardous substances. The bulk of the materials appears to have been procured from Department of Defense surplus. In 1997, the containers were abandoned at the site when business operations ceased at the property.

The abandoned substances include resins, adhesives, mercury amalgam, cleaning solvents, paint thinners and some unknowns. Incompatible containers of hazardous substances are commingled together and vary in size, type and degree of degradation. Evidence of vagrant trespass and vandalism was observed during EPA's December 2006 reconnaissance of the site.

Current Activities

Air monitoring continued at the Cannon Road Drum site from February 14 to February 17, and from February 19 to February 21, 2006. Air monitoring instrumentation included a TVA-1000 (a combination PID/FID), and a 4-gas meter equipped with an oxygen sensor and detectors for lower explosive limit, carbon monoxide, and hydrogen sulfide. Air monitoring of the perimeter was performed on a daily basis. Air monitoring of the work areas inside the main storage building and in the bays of Building 1 was performed during the day when workers were present.

For this period ERSS continued stabilization activities in the main storage area and in Bay B of Building 1. This consisted of relocating stacked pallets of 5 gallon buckets and commercial product to floor level. Cleaning operations consisted of clearing walkways of debris and dirt. To date, ERSS has completed 100% of this activity in both areas. In addition, all loose containers in the main storage area of Building 2 were combined on pallets based on hazard class. These pallets were relocated to Bay B of Building 1 for further segregation. When possible, loose containers are being consolidated with pallets of

the same commercial product. The field drum logs and the electronic drum inventory are being updated to reflect these additions. From February 14, 2007, to February 21, 2007 ERSS continued staging trash and hazardous materials in Bays A, B, and C of Building 1. Bay A, located in the northern portion of Building 1 is being used to store non-hazardous trash from Bay B and C. Bay B is being used to store flammable materials and for segregating loose commercial products into waste streams. Flammable pallets from the second staging area adjacent to Building 3 were relocated to Bay B. The additional space available in Bay B after trash had been removed has allowed flammable pallets to be stored with less exposure to wind and rain. ERSS field technicians logged and numbered pallets staged in Bay C of Building 1 and in the second staging area adjacent to Building 3. Information collected included drum/container type, size and condition. Any information present on specific chemical constituents or manufacturer name and address was also recorded. This information was entered into an Excel spreadsheet by START. To date Tetra Tech and ERSS have logged and staged approximately 19,000 containers with a total volume of roughly 20,500 gallons.

ERSS field technicians logged and numbered pallets staged in Bay C of Building 1 and in the second staging area adjacent to Building 3. Information collected included drum/container type, size and condition. Any information present on specific chemical constituents or manufacturer name and address was also recorded. This information was also entered into an excel spreadsheet by START. ERSS swept Building 4, an open area between Bays B and C and area adjacent to the main storage area of Building 2 for abandoned drums. Drums containing oil or other hazardous materials were staged along with the rest of the commercial products found onsite. ERSS also began bulking five pallets of mercuric nitrate solution currently staged in Bay C of Building 2. These pallets consist of 1 pint containers of mercuric nitrate, cardboard boxes, metal overpack containers and Styrofoam packing material. The packing materials are being treated as non-hazardous waste and the 1 pint containers were poured into 5 gallon buckets and then rinsed. The empty containers are being placed in poly lined cubic yard boxes and allowed to dry. ERSS performed this activity in full face APR's equipped with mercury vapor cartridges. START member Darius Soltes perform mercury vapor screening with a Lumex® light mercury spectrometer when the bulking operation was initiated. The headspace of the 5 gallon buckets used for bulking and the breathing zone was screened for mercury vapors. No mercury vapors were detected during the air monitoring survey.

Planned Removal Actions

ERSS will continue segregation and bulking activities In Bay B of Building 1. ERSS's subcontracted chemists will begin hazard categorizations of representative samples of commercial products and unknown containers. START will continue air monitoring of the perimeter and work areas, site documentation, researching MSDS information, and managing drum inventory.

Next Steps

Segregation, bulking and hazcat of unknowns will continue

Key Issues

None

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$350,000.00	\$135,000.00	\$215,000.00	61.43%
RST/START	\$40,000.00	\$27,000.00	\$13,000.00	32.50%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$50,000.00	\$10,000.00	\$40,000.00	80.00%
Total Site Costs	\$440,000.00	\$172,000.00	\$268,000.00	60.91%

* 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/cannonroaddrum

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