

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Monday, March 19, 2007

From: Jose Negron

To: Jim Mcguire, ERRB

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

POLREP No.:	8	Site #:	A4PM
Reporting Period:	March 7 -14, 2007	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 March 7 to March 14, 2007. Air monitoring was performed with a TVA-1000, a dual detector equipped with a photo-ionization detector (PID), and a flame ionization (FID). 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.

The results of the air monitoring indicated that only slight organic vapors were present around the perimeter of the site. From March 7, 2007, to March 14, 2007, ERSS continued segregation activities in Bay B of Building 1. This consisted of consolidating all loose containers in Bay B of Building 1. 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. Currently 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 lab packing and segregating loose

commercial products into waste streams.

ERSS field technicians logged and numbered pallets staged in Bay B of Building 1. Also, new drum logs were produced for 55 gallon drums and over packs used for bulking hazardous chemicals onsite. 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.

From March 7, 2007, to March 14, 2007, ERSS continued bulking hazardous commercial products. These products included scale prevention compound, solvents, flammable paints and resins. The empty containers are being placed either on pallets or in polyethylene lined cubic yard boxes and allowed to dry. ERSS performed bulking activities in full face APR's equipped with organic vapor cartridges. A summary of waste streams currently identified on the site is presented in Section D.

On March 8, 2007 two composite samples from six different lots of Coolanol® insulating oil was prepared for SBL laboratories. The two oil samples were screened for polychlorinated bi-phenyls (PCBs). On March 14, 2007 preliminary results for the analytical results indicated that no PCB's were present in either sample.

Planned Removal Actions

ERSS's 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. ERSS will submit 3 party bid proposals to disposal companies.

Next Steps

On March 24, 2007 ERSS and START personnel will demob from the Site pending receipt and award of disposal contract. All personnel will mobilize back to the site once disposal contract is awarded and a schedule for transportation and disposal is developed.

Key Issues

The following waste streams have been segregated and are staged for transportation and disposal.

Carbon Dioxide, 2.2, UN 1013

Corrosive Solids, Toxic, n.o.s. (sulfamic acid), 8, 6.1, UN 2923, PG II

Hazardous Waste Solids, n.o.s. (lead), 9, NA 3077, PG III

Mercuric Nitrate, 6.1, UN 1625, PG III

Mercury Compound, Liquid, n.o.s., 6.1, UN 2024, PG III

Non hazardous liquid materials

Non hazardous solid materials

Oxidizer, 5.1, UN 2208

Sodium Hydroxide, Solid, 8, UN 1823, PG II

Waste Adhesives, 3, UN1133, PG II

Waste Aerosols, flammable, 2.1, UN1950

Waste Amines, flammable, corrosive, n.o.s, 3, UN2733, PG II

Waste Amines, liquid, corrosive, flammable n.o.s, 3, UN2734, PG II

Waste Amines, liquid, corrosive, n.o.s., 8, UN2735, PG II

Waste Amines, solid, corrosive, n.o.s., 8, UN3259, PG II

Waste Chloroform, Poison Liquid, n.o.s., 6.1, UN 1888, PG III

Waste Corrosive Liquid, n.o.s. (citric acid, phosphoric acid), 8, UN 1760, PG II

Waste Corrosive Liquid, n.o.s. 8, UN 1760, PG II

Waste Corrosive Liquids, basic, organic, n.o.s., 8, UN3267, PG II

Waste Cyanide Solids, 6.1, UN 1935, (Silver CN)
 Waste Flammable Liquid, toxic, n.o.s. UN 1992
 Waste Flammable liquids n.o.s., 3, UN1993, PG II
 Waste Flammable Liquids, 3 UN1993, PG II
 Waste flammable solids, organic, n.o.s., 4.1, UN1325, PG II

Waste Isocyanates, flammable, toxic, n.o.s., 3, 6.1, UN2478, PG II,

Waste Isocyanates, toxic, flammable, n.o.s., 6.1, 3 UN3080, PG II,

Waste Isocyanates, toxic, n.o.s., 6.1, UN2206,
 PG II,

Waste Paint related materials, n.o.s., 3 UN1263, PG II

Waste Paint related materials, n.o.s., 8, UN3066, PG II

Waste Petroleum distillates, n.o.s., 3, UN1268, PG II

Waste Resin solution, 3, UN1866, PG II
 Waste Stream Categories

Waste Toxic Liquid, Organic, n.o.s., 6.1, UN 2810, PG II

Waste, Water Reactive Substances, Solid, n.o.s. (Magnesium Batteries), 4.3, UN 2813, PG II
 Carbon Dioxide, 2.2, UN 1013

Corrosive Solids, Toxic, n.o.s. (sulfamic acid), 8, 6.1, UN 2923, PG II

Hazardous Waste Solids, n.o.s. (lead), 9, NA 3077, PG III

Mercuric Nitrate, 6.1, UN 1625, PG III
 Mercury Compound, Liquid, n.o.s., 6.1, UN 2024, PG III

Non hazardous liquid materials

Non hazardous solid materials

Oxidizer, 5.1, UN 2208

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$350,000.00	\$340,500.00	\$9,500.00	2.71%
RST/START	\$40,000.00	\$35,600.00	\$4,400.00	11.00%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$50,000.00	\$20,000.00	\$30,000.00	60.00%
Total Site Costs				
	\$440,000.00	\$396,100.00	\$43,900.00	9.98%

* 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.