

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Monday, July 30, 2007

From: Steve Spurlin

To: Jim McGuire, USEPA - Region IV

Subject: Summary of Phase 2 Activities

LWD, Inc.

2475 Industrial Parkway, Calvert City, KY

Latitude: 37.0469000

Longitude: -88.3320000

POLREP No.:	17	Site #:	A4LQ
Reporting Period:	6/23/07 to 7/27/07	D.O. #:	46
Start Date:	3/2/2006	Response Authority:	CERCLA
Mob Date:	3/6/2006	Response Type:	Time-Critical
Demob Date:	3/24/2007	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 this PRP-lead Performance Period:

Operation of the wastewater treatment system (WWT) was halted at the beginning of this performance period due to exhausted carbon. The sand and carbon cells were cleaned and recharged. One load of spent sand/carbon waste from the water treatment system (approximately 20.6 tons) was transported off-site to be stabilized and landfilled. Approximately 77,700 gallons of water have been treated by the WWT system since recharge. Treated water is being used for decontamination operations and/or being land applied. During this performance period approximately 80,500 gallons of water have been land applied. This included approximately 3,000 gallons of water that had been treated during the previous period of performance and stored in an on-site frac tank. Six rolloffs (approximately 53.0 tons) of non-hazardous material were removed from site and transported for off-site disposal. One load of solidified hazardous waste (approximately 16.2 tons) was transported to an off-site incinerator for disposal during this period of performance. The PRP's environmental consultant, EnSafe, conducted a limited subsurface investigation of the soils beneath the AST secondary containment area.

During the week of July 27, 2007, the PRP's contractor dismantled the wastewater treatment system; cleaned and deconned empty frac tanks and removed from the site; and, demobed from the site.

The following items were addressed during Phase 2 activities:

- Characterized and disposed contents of two caustic tanks;
- Characterized and disposed 113 drums/totes of waste;
- Lab packed miscellaneous wastes located throughout the site;
- Disposed materials contained in the on-site vac trucks and tanker trailers;
- Continued operation of water treatment system for treatment of on-site water;
- Characterized and disposed of two roll-off boxes of floc material from water treatment activities;
- Characterized and disposed of spent sand/carbon from the water treatment system;
- Characterized and disposed of three roll-off boxes and the barge tank containing sludge material from the ASTs;
- Characterized and disposed of numerous roll-off boxes containing miscellaneous debris and ash located throughout the site;
- Approximately 330,000 gallons of contaminated water was treated through the WWT during the Phase II period of performance;
- Approximately 281,000 gallons of treated water was land applied;

- Approximately 786 tons of hazardous waste was removed from the site and transported for proper disposal; and,
- Approximately 53 tons of non-hazardous waste was removed from the site and transported for proper disposal.

Planned Removal Actions

Planned initiation of Phase 3 activities is anticipated around the end of August or the beginning of September 2007. The PRP Group's contractor for Phase 3 is tentatively scheduled to submit a work plan on August 16, 2007. A wastewater treatment system will be set up on site during Phase 3. Until Phase 3 operations begin, wastewater will be collected and stored on site.

Next Steps

The following items remain to be addressed:

- Removal/disposal of spent carbon/sand that will be generated during the dismantling of the water treatment system;
- Submittal and approval of the Phase 3 workplan;
- Continue site security and collecting water for treatment of wastewater on the site; and,
- Treat approximately 4,200 gallons of rinse water from frac tank cleanout that took place as the WWT was being dismantled.

Key Issues

Issues related to the bankruptcy status of the facility have hindered the progress of the site cleanup. Currently, the site has been temporarily halted prior to the initiation of the Phase 3. Once the bankruptcy issues have been clarified and the Phase 3 workplan is approved, the cleanup of the site will continue.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$2,200,000.00	\$2,180,000.00	\$20,000.00	0.91%
IAG - BOR	\$100,000.00	\$90,000.00	\$10,000.00	10.00%
RST/START	\$285,700.00	\$213,000.00	\$72,700.00	25.45%
USCG - Gulf Strike Team	\$50,000.00	\$1,500.00	\$48,500.00	97.00%
ERT	\$40,000.00	\$15,000.00	\$25,000.00	62.50%
Intramural Costs				
Total Site Costs	\$2,675,700.00	\$2,499,500.00	\$176,200.00	6.59%

* 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

Ten (10) waste Shipments of Class 9, NA3077 waste totaling 400,300 pounds/200.2 tons of hazardous material were transported to Michigan Disposal Waste Treatment in Belleville, Michigan. Certificates of disposal have not been received for these shipments.

Twenty-one (21) waste shipments and 3 overpack waste shipments of Class 9 NA3077 waste were transported to Veolia ES Technical Solutions in Sauget, Illinois totaling 587,880 pounds/293.9 tons of hazardous material. Certificates of disposal have not been received for these shipments.

Eighteen (18) waste shipments and 2 overpack waste shipments totaling 583,630 pounds/291.8 tons were transported to Veolia Technical Solutions, a treatment drum storage facility (TDSF), in West Carrollton, Ohio. Certificates of disposal have not been received for these shipments.

Six (6) non-hazardous waste shipments totaling 105,980 pounds/53.0 tons were transported to Republic

Waste Services landfill in Morganfield, Kentucky. Certificates of disposal have not been received for these shipments.

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POLREP #17 Last Updated 8/5/2007