

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Sunday, September 16, 2007

From: James Webster

Subject: Continuation of Action
Circle Environmental #2
2222 Albany Hwy, Dawson, GA
Latitude: 31.7611000
Longitude: -84.4361000

POLREP No.:	2	Site #:	A4FRD
Reporting Period:	09/11/2007 through 09/15/2007	D.O. #:	
Start Date:	9/10/2007	Response Authority:	CERCLA
Mob Date:	9/10/2007	Response Type:	Emergency
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	GAN000410082	Contract #	
RCRIS ID #:			

Site Description

The Circle Environmental #2 Site is located at 2222 Albany Highway in unincorporated Terrell County, Georgia, approximately 3 miles south of the Circle Environmental #1 Site. The Site occupies an undeveloped portion of a diesel engine repair and wrecker service.

USEPA received a request from the Georgia Environmental Protection Division to take action at the Site, on September 10, 2007. Reports from the State indicated that the Site is associated with an inactive waste management facility known as Circle Environmental located at 170 5th Street in Dawson, Georgia. Circle Environmental is reported to have been an operation that cleaned oil and solvent tainted wipe rags. Circle Environmental #2 was reported to contain in excess of 100 drums and a number of roll-off boxes partially filled with oil and solvent contaminated rags, believed to have come from the Circle Environmental facility in Dawson, Georgia. The FOSC responded to the facility on September 10, 2007, met with local officials at the Circle Environmental #1 Site and proceeded to the Circle Environmental #2 Site where he met with and received written access authorization from the property owner and performed a visual inspection of the Site. The following observations were made:

- Approximately 200+ drums, many of which appeared to be empty, but were suspected to have contained oil and solvent contaminated wipe rags that had been dumped into roll-off boxes at the Site. An unknown number of the drums appeared to be full of waste material. A large number of the open drums contained accumulated rainwater..
- Many of the drums carried labels indicating that they had contained flammable materials.
- Three roll-off containers were staged at the Site. Two of these containers were partially filled with suspected oil/solvent contaminated wipe rags.
- Additional wipe rags were littered across the Site.
- A noticeable solvent odor was present in the vicinity of several of the drums.
- The drums and roll-offs were located within 100 feet of Albany Highway.
- The Site was totally unsecured to prevent unauthorized access.

The primary chemicals of concern, based upon container labels and from information gained from local and state officials and the former operator, of the Site are believed to be waste oil, and organic solvents including flammable materials. All these materials were located within an unsecured area. The roll-offs contained contaminated wipe rags were not covered and not sealed to contain accumulated rainwater. Consequently, rainwater falling within the containers might come in contact with the waste material, pickup hazardous substances, and leak them to the environment.

Based upon his observations and findings, the OSC determined that conditions at the Site met NCP Part 300.415(b)(2) criteria for initiating a removal action. The action was initiated as a CERCLA fund-lead event.

Current Activities

During the reporting period, START, ERRS, and EPA staged all drums at the Site for inspection and documentation. A total of 364 drums were identified; of these, a total of 21 drums were filled with waste material and/or rainwater emptied from the the other drums. The remainder of the drums appeared to have had their contents emptied into the three open roll-off boxes staged at the Site. Following staging, representative samples of the contents of the drums and the roll-offs were collected for transportation and disposal profiling.

All empty drums were crushed and placed into roll-off boxes mobilized to the Site by ERRS. Three 20-yard roll-offs were filled in this manner. These and the roll-offs containing waste rags were covered to prevent rainwater accumulation.

Planned Removal Actions

Planned removal activities include off-site transportation and treatment, recycling, or disposal of all wastestreams at the Site. Soil samples will be collected to screen for the presence of soil contamination.

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