United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Wednesday, September 26, 2007
From: James Webster

To: Matt Taylor, USEPA R4, ERRB, Emergency
Response Section Chief

Subject: Continuation of Action
Circle Environmental #1
170 5th Ave SW, Dawson, GA
Latitude: 31.7731000
Longitude: -84.4478000

POLREP No.:	4	**Site #:**	A4RC
Reporting Period:	09/20 to 09/24/2007	**D.O. #:**	
Start Date:	9/11/2007	**Response Authority:**	CERCLA
Mob Date:	9/10/2007	**Response Type:**	Emergency
Demob Date:		**NPL Status:**	NPL
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:	GAR000005439	**Contract #**	
RCRIS ID #:			

Site Description

The Circle Environmental #1 Site is located at 170 5th Street in downtown Dawson, Terrell County, Georgia. The facility consists of a brick/wood-construction warehouse measuring approximately 120 by 60 feet in size.

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 is an inactive waste management facility that cleaned oil and solvent tainted wipe rags. The FOSC responded to the faciliy on September 10, 2007, met with local officials, and noted the following either through direct observation or through city and county officials:

• Approximately 300+ drums (later inventory fixed number at 532)of suspected wastes stored within the subject warehouse.
• Many of the drums carried labels indicating waste oil and oil sorbents, flammable materials, and tetrachloroethylene (PCE) wastes.
• Total airborne volatile organic compound (VOC) readings at the warehouse doorway were on the order of 8 to 10 parts-per-million (MultiRae).
• The warehouse is located within the downtown business district of Dawson, immediately adjacent to the City Hall and actually abutted a number of active businesses.
• Residential buildings are located within three city blocks of the warehouse.
• Local officials indicated that heavy solvent odors emeniating form the warehouse was one of the factors that had brought the site to local and state attention.

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 tetrachloroethylene. Tetrachloroethylene is a CERCLA hazardous substance. Waste oil is treated as a hazardous substance for purposes of response actions under CERCLA.

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 the response team initiated overpacking of all drums containing free liquids, as the majority of the drums are in questionable condition and a number had developed minor leaks. Waste profile sampling of all waste-streams continued.

START conducted air monitoring inside the warehouse and along 5th Avenue to ensure safe conditions.

Planned Removal Actions
Overpacking and sampling operations will be completed during the next reporting period. Following this action, the response team will demobilize from the Site, pending the transportation and disposal phase of the removal. Around-the-clock security will be maintained at the facility for the duration of the of the demobilization period.

Key Issues
Considering its location in downtown Dawson, Georgia and the limited work space at the Site, EPA plans to expedite the disposal phase of the removal and will not bulk waste-steams prior to off-site shipment.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$75,000.00	$40,000.00	$35,000.00	46.67%
RST/START	$40,000.00	$20,000.00	$20,000.00	50.00%
Intramural Costs				
USEPA - Direct (Region, HQ)	$5,000.00	$3,500.00	$1,500.00	30.00%
Total Site Costs	$120,000.00	$63,500.00	$56,500.00	47.08%

* 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.