

**United States Environmental Protection Agency
Region IV
POLLUTION REPORT**

Date: Monday, October 1, 2007

From: Steve Spurlin

To: Jim McGuire, USEPA - Region IV

Subject: Phase 3 Activities Begin
LWD, Inc.
2475 Industrial Parkway, Calvert City, KY
Latitude: 37.0469000
Longitude: -88.3320000

POLREP No.:	18	Site #:	A4LQ
Reporting Period:		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:

On July 27, 2007, the PRP group's Phase 2 contractor demobed from the site. Clark Security provided 24 hour security at the site and monitored rainwater accumulation levels in secondary containment structures following rainfall events while there were no daily activities pending the start of Phase 3.

The week of July 29 to August 4, 2007 issues related to the bankruptcy status of the facility, that threatened to hinder the progress of the site cleanup, were resolved.

The draft Phase 3 planning documents (Quality Assurance Project Plan, Health and Safety Plan, and the Decontamination and Demolition Plan) were scheduled to be delivered to EPA on or before August 16, 2007. A one week schedule extension for submittal of the work plans was requested from and granted by EPA. Work plans were submitted to EPA August 23, 2007.

A pre-plan review meeting was held at the site on August 24, 2007 to give the PRP group's contractor an opportunity to discuss their approach to the building decontamination and demolition with the plan reviewers from EPA (including U.S. Coast Guard Gulf Strike Team members providing safety support and the START contractor) and KDEP.

On September 4, 2007 EPA provided comments (including KDEP's comments) on the draft Phase 3 planning documents and the PRP group's contractor began making the necessary revisions to address the comments.

The revised planning documents were submitted to EPA on September 18, 2007. Mobilization for Phase 3 field activities and a kick-off meeting occurred on September 19, 2007. Waste characterization samples were collected for each incineration unit and the interior of the incineration building on September 20, 2007.

Development of the Phase 4 investigation work plan has been initiated.

Planned Removal Actions

Until the Phase 3 wastewater treatment system is set up on site and operations begin, wastewater will be collected and stored on site.

Next Steps

The following items remain to be addressed:

- Continue site security and collecting water for treatment of wastewater on the site;
- Set up a wastewater treatment system;
- Treat approximately 4,200 gallons of rinse water from frac tank cleanout that took place as the WWT from Phase 2 was being dismantled;
- Decontamination and demolition of LWD structures and equipment, on-going;
- The PRP group's Phase 2 contractor will continue consolidating information documenting Phase 2 waste disposal activities; and
- Continue development of the Phase 4 work plan, due to EPA by October 12th.

Key Issues

All of the certificates of disposal have not been received for Phase 2 shipments from the PRP's contractor.

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

Waste characterization samples were collected for each incineration unit and the interior of the incineration building.

response.epa.gov/LWD

POLREP #18 Last Updated 10/2/2007