

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Friday, October 26, 2007

From: Steve Spurlin

To: Jim McGuire, USEPA - Region IV

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

POLREP No.:	19	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:

Clark Security provides 24 hour security at the site. Brandenburg mobilized to the site and began Phase 3 operations on September 18, 2007. A PRP Kick-Off meeting was conducted with several members of the PRP Technical Committee present on September 19, 2007. Brandenburg collected waste profile samples of the three incinerators, the bag house units, and floor dust within the incinerator building. Miscellaneous debris was removed from the maintenance shop. The drum storage warehouse and the drum prep building were pressure washed and the floors were cleaned with a floor sweeper that was mounted on a skid steer. The floor of the incinerator building was sprayed with water and cleaned with a floor sweeper that was mounted on a skid steer. Brandenburg sealed openings in the ceiling and vent covers with polyvinyl sheeting to eliminate dust emissions from leaving the building.

The wastewater treatment system (WWT) has been completed and approximately 40,000 gallons of water has been treated from October 18, 2007 to date. Approximately 4,200 gallons of waste water was treated that had remained on site from decon operations performed by Veolia during the Phase II shutdown operations. Treated water is being used for building and steel decontamination operations. Water samples of the WWT effluent were collected on October 25, 2007 to determine the efficiency of the WWT system and to establish if excess amounts of treated water meets the criteria for on-site land application.

Demolition activities have begun. Asbestos floor tile was removed from the women's locker room and asbestos material was removed from the fume hoods in the laboratory building. These materials were shipped to Western Kentucky Landfill in Mayfield, KY. The laboratory and office trailers were crushed and separated into debris and scrap metal. Seventeen roll-off boxes of debris, totaling approximately 83 tons, were shipped to Western Kentucky Landfill in Mayfield, KY. The stockpile of roll-off boxes on-site were cut into scrap with a track excavator with a sheer attachment. The sodium hydroxide above-ground storage tanks (ASTs), scrubber water ASTs, surge water ASTs, and the unit 3 scrubber system on the south side of the building were cut up with sheers. The material feed units for incinerators 2 and 3 inside the building have been demolished, as well as, the control room, ash room, and transformer building. All metal is deconned with pressure washers prior to placement in disposal piles. The disposal piles are cut into shippable pieces with a sheer unit attached to a track excavator. To date, 22 loads of scrap steel totaling almost 350 tons have been shipped to River Metal in Metropolis, IL for recycling.

A job safety analysis (JSA) for the removal of the HF (hydrofluoric acid) line from the former northern tank

farm to incinerator unit 1 was prepared by Brandenburg and submitted to the EPA for review and comment. EPA comments were incorporated into the JSA, it has been approved by EPA, EnSafe, and the PRP Technical Committee.

Development of the Phase 4 investigation work plan has been initiated. On-site monitoring wells were developed and prepared for future sampling events to assess the condition of groundwater at the site.

Planned Removal Actions

Brandenburg plans to accomplish the following during the next period of performance:

- Operate the wastewater treatment system;
- Decon all scrap steel on-site;
- Ship scrap steel and debris off-site;
- Remove hydraulic and transformer oils from on-site equipment;
- Remove the HF line using JSA protocols;
- Complete the demolition of the unit 3 scrubber equipment;
- Begin demolition of the unit 3 bag house equipment; and,
- Prepare JSAs for the demolition of the smoke stacks.

Next Steps

The following items remain to be addressed:

- Continue site security;
- Decontamination and demolition of LWD structures and equipment, on-going; and,
- Continue the development of phase 4 sampling plans and protocols.

Key Issues

Weather continues to pose problems at the Site. Extended periods of rain cause delays or suspension of certain work activities. The arrival of colder weather requires more time to complete tasks and poses a potential safety issue with workers.

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	\$230,000.00	\$55,700.00	19.50%
USCG - Gulf Strike Team	\$50,000.00	\$10,000.00	\$40,000.00	80.00%
ERT	\$40,000.00	\$16,000.00	\$24,000.00	60.00%
Intramural Costs				
Total Site Costs	\$2,675,700.00	\$2,526,000.00	\$149,700.00	5.59%

* 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

A total of 22 shipments of scrap steel totaling approximately 350 tons was sent to River Metals in Metropolis, Illinois. Receipt certificates have been received for these shipments.

A total of 17 roll-off boxes of garbage totaling almost 83 tons have been sent to the Western Kentucky Landfill in Mayfield, Kentucky. Receipt certificates have been received for these shipments.

One 20-yard roll-off box of asbestos containing materials (ACM) was shipped to Western Kentucky Landfill in Mayfield, KY.

One shipment of material was shipped to Luminaires Recyclers in St. Paul, MN and included 156 8' lamps, 320 4' lamps, 140 HID lamps, 117 capacitors, and 17 lead acid batteries.

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POLREP #19 Last Updated 12/5/2007