

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Wednesday, December 5, 2007

From: Steve Spurlin

To: Jim McGuire, USEPA - Region IV

Subject: LWD, Inc.

2475 Industrial Parkway, Calvert City, KY

Latitude: 37.0469000

Longitude: -88.3320000

POLREP No.:	20	Site #:	A4LQ
Reporting Period:	10/29/2007 - 12/5/2007	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. During this period of performance, Brandenburg drained hydraulic oil, motor oil, and transformer oil from all pieces of equipment associated with the former LWD operations. Approximately 5500 gallons of waste oil was shipped to Heritage Environmental Services in Indianapolis, IN. Brandenburg also removed copper wire from the site buildings. Two loads of copper, totaling approximately 15 tons, were shipped to River Metal Recycling in Metropolis, IL. One load of electronic waste (E-waste) was picked up by E-Scrap for recycling.

The wastewater treatment system (WWT) has treated approximately 66,000 gallons of water during this period of performance. Treated water is being used for building and steel decontamination operations. Water samples of the WWT effluent were collected on November 8, 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. No land application of water was performed during this period of performance.

Demolition activities continue. Brandenburg demolished the Unit 3 scrubber unit and associated piping, as well as, the Maintenance Shop building. Inside the incinerator building, the Unit 3 bag house and dry box and associated equipment have been demolished. 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. Sixteen roll-off boxes of steel, totaling approximately 234 tons, were shipped to River Metal Recycling in Metropolis, IL. Ten roll-off boxes of non-hazardous debris, totaling approximately 80 tons, were shipped to Western Kentucky Landfill in Mayfield, KY.

During this period of performance, 13 loads of hazardous waste, totaling approximately 256 tons, were shipped to Stablex in Quebec, Canada for disposal via Heritage Environmental Services in Indianapolis, IN.

The HF (hydrofluoric acid)line from the former northern tank farm to incinerator unit 1 was removed according to the job safety analysis (JSA) that was prepared and approved during the last period of performance. All of the HF piping was wrapped in polyvinyl sheeting and placed in a secure roll-off box for future removal from site.

A job safety analysis (JSA) for the demolition of the Unit 3 stack located at the south of the Incinerator building was prepared by Brandenburg and was submitted to EnSafe and EPA for review and comment. Comments were incorporated into the JSA and it has been approved by EnSafe and EPA.

Development of the Phase 4 investigation work plan has been completed. On-site monitoring wells are scheduled to be sampled the week of December 10 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 deconned scrap steel and debris off-site;
- Complete Unit 3 stack demolition following JSA protocols; and,
- Complete the demolition of the Unit 3 incinerator equipment.

Next Steps

The following items remain to be addressed:

- Continue site security;
- Monitor the wastewater treatment system for the reduction of suspended solids and metals concentrations.
- Continue decontamination and demolition of LWD structures and equipment; and,
- Phase 4 sampling of on-site monitoring wells is planned for the week of December 10, 2007.

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, set-up and break-down equipment, 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	\$250,000.00	\$35,700.00	12.50%
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	\$2,546,000.00	\$129,700.00	4.85%

* 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 38 loads of scrap steel totaling approximately 568 tons have been shipped to River Metal Recycling in Metropolis, IL for recycling.

A total of 27 loads of non-hazardous debris, totaling approximately 116 tons, have been shipped to Western Kentucky Landfill in Mayfield, KY

A total of 13 loads of hazardous waste, totaling approximately 256 tons, have been shipped to Stalex in Quebec, Canada for disposal.

Two loads of copper, totaling 15 tons, have been sent to River Metal Recycling in Metropolis, IL.

Approximately 5500 gallons of waste oil have been shipped to Heritage Environmental Services in Indianapolis, IN for disposal.

One load of electronic waste (E-waste) was picked up by E-Scrap for recycling.

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 for recycling. The shipment included 156 8' lamps, 320 4' lamps, 140 HID lamps, 117 capacitors, and 17 lead acid batteries.

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POLREP #20 Last Updated 12/6/2007