

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Sunday, March 2, 2008

From: Leigh Lattimore

To: Shane Hitchcock, US EPA

Subject: Initiation of Action

Puckett Smelter

3329 Mountainboro Rd., Mountainboro, AL

Latitude: 34.1528000

Longitude: -86.1244000

POLREP No.:	2	Site #:	A4QJ
Reporting Period:		D.O. #:	
Start Date:	2/25/2008	Response Authority:	CERCLA
Mob Date:	2/25/2008	Response Type:	Time-Critical
Demob Date:	3/14/2008	NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:		Contract #	
RCRIS ID #:			

Site Description

Puckett Smelter is a 3.01 acre Site located at 3329 Mountainboro Road, Mountainboro, Etowah County, Alabama. The Site is relatively level and slopes towards an unnamed tributary to Short Creek, which lies along the northern boundary of the site. The Site is bordered to the east by Mountainboro Road and to the west and south by undeveloped land.

There is little historical information for Puckett Smelter. According to the original owner, the facility operated from the early 1990s to the mid 1990s. The property has four main ash piles. The rest of the ash is spread out in between the piles.

In 1999, a RCRA inspection of the Site was conducted in response to a complaint by a department within the Alabama Department of Environmental Management (ADEM). During the investigation ADEM sampled the ash piles. The analytical results revealed high levels of lead. Based on the results, ADEM issued a Notice of Violation (NOV) to the property owner for storing hazardous waste on site without a permit.

In 2000, due to the land owner not responding to the NOV ADEM's Hazardous Waste Branch issued an Administrative Order (AO). After the AO was issued the owner responded to ADEM and indicated he did not have the ability to pay for the cleanup or penalty. ADEM's Hazardous Waste Branch referred the Site to the their Hazardous Substance Branch.

In 2003, a Preliminary Assessment (PA) was completed. Based on the findings of the PA, ADEM referred the Site to the Environmental Protection Agency (EPA) Emergency Response and Removal Branch (ERRB) for further assessment. On April 9, 2007 ADEM requested that the Site be reviewed for eligibility for expenditure of Federal funds to help mitigate the potential environmental impacts from the release of unsecured materials on Site.

On May 14, 2007, ERRB and Superfund Technical Assessment Response Team (START) arrived on Site to conduct a Removal Site Evaluation (RSE). One composite sample of each ash pile was collected for metals, volatile organic compounds (VOCs), semi volatile organic compounds (SVOCs), and Poly Chlorinated Biphenyls (PCBs). One composite sample consisting of all the ash piles was collected and sampled for dioxins. Seven soil, three sediment, and three surface water samples were also collected.

The RSE revealed that four metals exceeded the calculated RALs for surface soil: aluminum, antimony, copper, and lead. Copper and lead were found at concentrations above the RALs in all four composite samples, while antimony was detected in three of the four samples. Aluminum slightly exceeded its RAL in only one sample. PCBs were also detected above the RALs in two out of four composite samples. The dioxin toxicity equivalence quotient (TEQ) for the composite sample collected was reported to be 460

ng/kg (ppt). This concentration is below the OSWER recommended clean-up criteria for residential soil, 1 ppb.

Lead, copper, antimony, and PCBs are hazardous substances as defined by section 101(14) of the CERCLA and RCRA characteristic definitions. CERCLA contaminants, if released from the Site, have the capability of presenting a potential hazard to the general public. The threats come primarily from human exposure to these hazardous substances in the ash piles (i.e. trespassers) as well as a potential for surface or air migration. Direct contact, ingestion, and inhalation of lead, antimony and PCBs are the primary pathways of exposure. Continued exposure of lead, antimony and PCBs in the soils may cause potential chronic health effects to persons living nearby and trespassers. The conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal action. On December 6, 2007, the action memorandum was signed.

The removal action is a fund lead action. The previous landowners were unresponsive to EPA's request for documentation regarding their finances and Site history. The current landowners have declined to conduct the removal work.

Current Activities

On February 25, 2008 personnel from the EPA, START and Emergency and Rapid Response Services (ERRS) mobilized to the Puckett Smelter Site in Mountainboro, AL. The following activities were completed on Site during the week of February 25, 2008:

- Initial site activities consisted of removing large debris such as used tires and household trash away from the contaminated area;
- Silt fencing was placed in areas where there was a potential for ash or contaminated soil to migrate away from the excavation;
- The Site was inspected for ash that had been spread away from the piles due to scavenging activities by squatters and trespassers;
- A Niton X-Ray Fluorescence (XRF) instrument was used to delineate areas that were impacted by lead contaminated ash and those areas that were not;
- ERRS scraped off the upper layer of ash contaminated soil and these areas were screened with XRF to confirm that all lead contaminated material had been removed;
- ERRS consolidated the ash piles and the excavated soil in the northeastern part of the Site;
- The eastern side of the contaminated area was identified and utilized as the treatment area for the contaminated ash, soil and the SulfiTech®, a tri-sodium sulfate compound used to chemically stabilize and reduce the leaching of metals from soil;
- At the end of each work shift ERRS covered the consolidated ash piles with 6 millimeter thick plastic sheeting;
- During the removal action DustTrak® particulate air monitors were utilized to insure that ash was not causing a health and safety risk;
- The ash piles were periodically sprayed with water in order to reduce the potential for dust to become airborne;
- ERRS treated the ash and contaminated soil with SulfiTech A/T;
- Once the SulfiTech A/T was thoroughly homogenized with the contaminated ash and soil a composite sample of the mixture was submitted for laboratory analysis to insure proper characterization prior to disposal.

Next Steps

The following activities will be completed:

- Once the analytical results are back, the treated ash and soil will be disposed at an approved landfill;
- START will collect confirmatory samples;
- ERRS will begin to backfill excavated areas;
- START will continue to document Site activities.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$261,541.00	\$20,000.00	\$241,541.00	92.35%
RST/START	\$36,456.00	\$10,000.00	\$26,456.00	72.57%
Intramural Costs				

Total Site Costs	\$297,997.00	\$30,000.00	\$267,997.00	89.93%
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* 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.

response.epa.gov/PuckettSmelter

POLREP #2 Last Updated 5/13/2008