

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Monday, March 31, 2008

From: Steve Spurlin

Subject: Phase 3 and Phase 4 Continues

LWD, Inc.

2475 Industrial Parkway, Calvert City, KY

Latitude: 37.0469000

Longitude: -88.3320000

POLREP No.:	24	Site #:	A4LQ
Reporting Period:	2/15/08 to 3/28/08	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.

Since the beginning of this period of performance on 2/16/08, the wastewater treatment system (WWT) has treated approximately 262,000 gallons of water. Of this, 157,000 gallons was water already stored in three frac tanks that was recirculated prior to sampling events. Treated water is being stored in frac tanks until adjustments can be made to the WWT prior to authorization to land apply the water. Brandenburg met with EnSafe the week of 3/17/08 to address the WWT system and are evaluating options to adjust the system to meet land application goals. No land application of water was performed during this period of performance.

Demolition activities have been completed. All metal was deconned with pressure washers prior to placement in disposal piles. The disposal piles are cut into shippable pieces with a shear unit attached to a track excavator. Thirty-nine roll-off boxes of decontaminated steel, totaling approximately 642 tons, were shipped to River Metal Recycling in Metropolis, IL for recycling.

During this period of performance, six loads of hazardous waste from the incinerator building pad totaling approximately 112 tons, were shipped to Stablex in Quebec, Canada for disposal via Heritage Environmental Services in Indianapolis, IN. In addition, two loads of hazardous waste from Units 1 and 3, totaling approximately 31 tons, were shipped to Heritage Environmental Services in Indianapolis, IN.

On 3/7/08, members of the PRP group technical committee were in Calvert City for a progress meeting with EnSafe and the EPA. The meeting was held at Arkema. Following the meeting, PRP members were escorted through the site to see the progress that has been made to date. Also, the PRP group was asked to comment on how to address the cracked concrete flooring within the Incinerator building footprint.

An EnSafe crew was on site the week of 3/24/08 to conduct a land surveying event. The data collected will be used to design a plan to cap the Incinerator building pad after the cracked concrete flooring is addressed.

EPA and EnSafe is planning to conduct a soil sampling event the week of 3/31/08 in the wetland areas on and around the site.

Winds during this period of performance were predominantly out of the west with an average wind speed of 6.1 mph.

Planned Removal Actions

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

- Adjust WWT system to operate within the analytical parameters for water to be land applied;
- Treat all wastewater stored on-site;
- Stabilize trench sludge for off-site disposal using an approved desiccant;
- Ship remaining hazardous waste off site to Indianapolis and Quebec; and,
- Begin the Incinerator building pad concrete/waste removal activities.

EnSafe will continue to plan and conduct Phase 4 site investigation activities as necessary.

EPA, USCG GST, and START will continue to provide oversight of the response.

Next Steps

The following items remain to be addressed:

- Continue site security;
- Monitor the WWT system for the reduction of suspended solids and metals concentrations, alter system as needed to accomplish land application goals;
- Evaluate the results of Phase 4 on-site surveying event to provide a plan to address the issues with the Incinerator building pad; and,
- Prepare to conduct the next steps of the Phase 4 subsurface investigation activities.

OSC Glenn Adams is turning over EPA's over-sight to OSC Steve Spurlin effective 4/7/08.

Key Issues

Weather continues to pose problems at the Site. Extended periods of rain cause delays or suspension of certain work activities. Increased accumulation of rainwater will require more time to complete the remaining tasks and poses a potential safety issue with workers.

Disposition of Wastes

A total of 147 loads of scrap steel totaling approximately 2,450 tons have been shipped to River Metal Recycling in Metropolis, IL for recycling.

A total of 29 loads of non-hazardous debris, totaling approximately 128 tons, have been shipped to Western Kentucky Landfill in Mayfield, KY

A total of 54 loads of hazardous waste, totaling approximately 1,045 tons, have been shipped to Stablex in Quebec, Canada for disposal.

A total of 84 loads of hazardous waste, totaling approximately 1,577 tons, have been shipped to Heritage Environmental Services in Indianapolis, Indiana for disposal.

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

Approximately 11,100 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.

response.epa.gov/LWD