United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Wednesday, June 11, 2008
From: Leo Francendese

Subject: HoltraChem
636 John L Riegel Rd., Riegelwood, NC

POLREP No.:	3	**Site #:**	A47J
Reporting Period:	June 1-7, 2008	**D.O. #:**	
Start Date:	5/19/2008	**Response Authority:**	CERCLA
Mob Date:	5/19/2008	**Response Type:**	Time-Critical
Demob Date:		**NPL Status:**	Non NPL
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:	NCD991928631	**Contract #**	
RCRIS ID #:			

Site Description
The HoltraChem Site (also known as Acme Alkali) is comprised of approximately 24 acres and is located at 636 John L. Riegel Road in Riegelwood, Columbus County, North Carolina. It is surrounded on three sides by International Paper (IP), which is comprised of approximately 1,500 acres. Both HoltraChem and IP border the Cape Fear River. The surrounding area is a mixture of industrial, residential and commercial uses.

The area subject to this removal action includes neighboring IP's North Bay treatment pond, also known as Cell #2. IP formerly accepted process water generated during chlorine production from the Holtra Chem facility. HoltraChem operated as a chlor-alkali facility using the mercury cell process from 1963 to 1999, when facility operations ceased. HoltraChem was originally constructed to provide chlorine gas, caustic soda, and bleach to the IP facility. Process water from the former HoltraChem facility was reportedly discharged to the northwest corner of Cell #2 via a 16-inch diameter, corrugated galvanized steel pipe from approximately 1963 to the late 1970s or early 1980s.

A time-critical removal action was conducted at the HoltraChem Site during 2003 – 2004, during which containerized hazardous waste and the former cell building were removed. In 2004, an Engineering Evaluation / Cost Analysis (EE/CA) investigation began at the Site. During the EE/CA, the primary contaminants of concern were identified as mercury and PCB Aroclor 1268. Sampling conducted by IP identified PCB Aroclor 1268 at concentrations up to 5,100 mg/kg in Cell #2. PCB contamination extends to a depth of approximately 12 feet below the ground surface. PCB contamination has been found in the adjacent Cape Fear River sediments. IP needs to utilize Cell #2 for the expansion of their landfill sooner than the EE/CA will be completed. Therefore, a Time-Critical Removal Action is being taken to excavate the contaminated Wastewater Treatment Solids (WWTS) from Cell #2 and place the WWTS with concentrations exceeding 50 mg/kg in temporary storage on the HoltraChem Site until the final cleanup plan is selected for HoltraChem. The estimated volume of this material is 6,500 cubic yards. The cleanup goal for this removal action is 11 mg/kg based on the Human Health Risk Assessment for the Holtra Chem Site. WWTS with concentrations between 11 mg/kg and 50 mg/kg will also be excavated, but will be placed in IP's landfill Cell #1. The estimated volume WWTS with PCB concentrations between 1 mg/kg and 49 mg/kg is 93,500 cubic yards.

The Enforcement Action Memorandum for this time-critical removal action was signed on May 13, 2008. The Effective Date of the Administrative Order on Consent for this removal action was May 20, 2008.

Current Activities
RPM Samantha Urquhart-Foster provided oversight of removal activities during this reporting period (June 1-8, 2008). IP's Cell #2 was divided into 100'x100' and 50'x50' grids during the investigation phase. Grids are labeled with a letter and a number. Grid locations can be found in a Figure in the Action Memo. Activities conducted by the PRPs' contractors during this reporting period included:

• Completed excavation of overburden material from Cell #2 grids H-5, I-4, I-5, I-6, I-8, J-5, K-5, K-6,

and M-6. The volume of material excavated is estimated at 5,516 cubic yards for this reporting period. Based on analytical results, overburden material from I-4, J-5, K-5, K-6, and M-6 was transported to Cell #1. The grid totals and destination for excavated overburden for the week ending 06/08/08 are provided below. Each load is estimated at 14 cubic yards; actual quantity of overburden material removed will be surveyed using the Trimble system to determine in-place cubic yards removed. The load destination is abbreviated in parenthesis (TS = Temporary Stockpile, CM = Construction Material, ES = Engineered Stockpile, IPL = IP Landfill Cell #1).

Grid H-5 = 24 loads (TS)
Grid I-4 = 27 loads (TS), 22 loads (IPL)
Grid I-5 = 10 loads (TS)
Grid I-6 = 69 loads (TS)
Grid J-5 = 3 loads (TS), 3 loads (IPL)
Grid K-5 = 2 loads (TS), 3 loads (IPL)
Grid K-6 = 71 loads (TS), 83 loads (IPL)
Grid M-6 = 62 loads (IPL)
Grid M-10 = 2 loads (CM)
Grid M-12 = 13 loads (CM)

• Built entrance ramp to provide access to the engineered stockpile.

• EPA and NCDENR reviewed and accepted the QC test results for the 60 mil liner on the engineered stockpile.

• EPA reviewed analytical data and provided concurrence on CH2M Hill's recommended disposition of overburden stockpiles, which were based on parameters established in the Work Plan.

Planned Removal Actions

RPM Samantha Urquhart-Foster will provide oversight during the next reporting period, June 9-15, 2008. Activities planned for the next reporting period include:

• Depending on analytical results, transport remaining overburden stockpiled material to either the engineered stockpile (> 50 mg/kg) or Cell #1 (< 50 mg/kg).

• Begin excavating > 50 mg/kg material and transport to engineered stockpile (fly ash will be onsite for solidification as needed).

• Potentially begin post-excavation confirmation sampling and analysis.

• Initiate pumping water from Cell #2 through the treatment system. Water samples will be collected per Section 3.4 of the Work Plan as well as per the Sampling and Analysis Plan – between the carbon vessels and after the 3 micron bag filters – and analyzed for Aroclor 1268.

Next Steps

Removal activities remain on schedule and are planned through July 15, 2008, with demobilization scheduled for the first week of August 2008.

response.epa.gov/holtrachemWWTS