United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Thursday, July 24, 2008
From: Michael Towle

Subject: Action Memorandum Signed
Lin Electric Company Site
1400 Bluefield Avenue, Bluefield, WV
Latitude: 37.2630900
Longitude: -81.2409500

POLREP No.:	5	**Site #:**	A3CN
Reporting Period:		**D.O. #:**	
Start Date:		**Response Authority:**	CERCLA
Mob Date:		**Response Type:**	Time-Critical
Demob Date:		**NPL Status:**	
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:		**Contract #**	
RCRIS ID #:			

Site Description

A. The Lin Electric Company Site (Site) is located at 1400 Bluefield Avenue in Bluefield, Mercer County, West Virginia. The Site is bound by Bluefield Avenue (east), active railroad tracks (west), and two commercial properties. A school and residential area is located across Bluefield Avenue.

B. The Site is the location of the former Lin Electric Company facility. The Lin Electric Company operated an electrical coil manufacture and electric motor repair and service business at the Site from approximately 1988 to 2003.

C. Prior to 1988, the facility at the Site was operated by National Electric Coil Company and, subsequently, McGraw-Edison Service Group (a division of the McGraw-Edison Company). Cooper Industries merged with the McGraw-Edison Company in 1985.

D. Between 1986 and 1988, Cooper Industries undertook an extensive cleanup and closure of the facility under the direction of the State of West Virginia between 1986 and 1988. Among other things, polychlorinated biphenyl (PCB) contamination was removed from a variety of surfaces. The closure was conducted in 3 phases. In the first phase, drums, TCE-contaminated soil, and tanks were characterized. PCB (aroclor 1260) was found in transformers, unknown sludges (aroclor 1242), and soil around the TCE tank (aroclor 1254). Additional characterization and disposal activities were conducted in Phase II. PCB contamination was found on many floor areas (aroclors 1248 and 1260), sludges and residues from floor drains and a basement (aroclor 1242, 1248 and 1254) and upon machines and equipment (aroclor 1242 and 1260). Additionally, PCB was detected within water found within vaults (aroclor 1254) and resulting from decontamination operations (aroclor 1242 and 1254). In the third and final phase of the cleanup, the surfaces in the building were decontaminated, certain drains and drainage systems were cleaned, and wastes were disposed.

E. It was noted in the Cleanup Plan documentation that due to the large number of drains serving the plant, that it would be impractical to conduct comprehensive decontamination testing; as such, only a limited number of the drains were tested. A review of the Closure documents conducted by this OSC finds no mention of the inspection, analysis or cleanup of sewer (sanitary) drains located at the facility.

F. Subsequent to the closure of the facility by Cooper Industries, the Lin Electric Company operated similarly at the Site.

G. The West Virginia Department of Environmental Protection (WVDEP) inspected the Site on April 22, 2004, and found the facility unutilized, in disrepair, flooded, and containing numerous containers of hazardous substances. WVDEP and the U.S. Environmental Protection Agency (EPA) evaluated the Site for conditions which may warrant removal action pursuant to CERCLA. A removal site evaluation was conducted between November 30 and December 2, 2004. The evaluation noted, among other things,

that numerous containers of hazardous substances were present, containers were in poor condition and unsecured, and multiple drain systems within the facility could provide a route for spilled materials to enter the storm drain system connected to a nearby stream.

H. An EPA On-Scene Coordinator (OSC) initiated a Removal Action at the Site on December 2, 2004, pursuant to Delegation of Authority 14-2 which allows the OSC to initiate Removal Actions costing less than $250,000. Among other things, the scope of the Removal Action involved the removal of drums and the decontamination of areas identified by the OSC in 2004. On December 11, 2004, the OSC reported that sampling of the floor and sanitary drains would occur to determine if PCBs are present. On January 10, 2005, the OSC received analytical information indicating 11 mg/kg PCB (aroclor 1248) was found in a drain at the Site. On January 20, 2005, the OSC received analytical information indicating that 6.6 mg/kg PCB (aroclor 1242) was found in the oil within the flooded basement.

I. On January 10, 2005, the OSC concluded that no further PCB study was necessary at the Site and on January 28, 2005, determined that nine (9) drums found in the flooded and oil-covered basement of the facility would not be addressed by the Removal Action. The depth of the water in the basement was estimated at about 3 feet and described as about "chest deep". The drums and wastes generated during the Removal Action were transported from the Site and the Removal Action was subsequently completed January 31, 2005.

J. In 2004 and 2005, the United States Geological Survey, West Virginia Department of Environmental Protection (WVDEP) and the Virginia Department of Environmental Quality (VADEQ) conducted sampling and analysis of surface water in the Bluestone River and its tributaries as part of an effort to determine the extent of PCB contamination in the surface waters. PCB contamination in the Bluestone River had caused elevated concentrations of PCB to become located within the tissues of fish within the River. Whitley Creek, which drains the Lin Electric Company Site, was found to have PCB contamination. Whitley Creek drains to Beaverpond Creek which drains to Bluestone River. PCB was also found in the Bluestone River at the area's sewer treatment plant indicating the potential for PCB contamination to be migrating through the area's sewer system. Due to elevated PCB in fish tissue, a fish consumption advisory has been issued by the Virginia Department of Health and the West Virginia Department of Health and Human Resources for the Bluestone. Analytical data collected by VADEQ in August 2000 indicated elevated PCB (2,639 ppb) in the tissue of fish caught within the Bluestone River.

K. In Spring 2008, the WVDEP and VADEQ and EPA reviewed available Lin Electric Company Site data and information in the context of the evaluation of PCB contamination in the Bluestone River; EPA was requested to conduct additional removal site evaluation of the Lin Electric Company Site.

L. The EPA OSC, along with WVDEP, initiated an evaluation of the Site in June 2008. At the time of the June 2008 removal site evaluation, the Site property had been sold through foreclosure to new owners actively conducting demolition operations at the Site. The present owners, through discussion with the bank and former owner, believed that the Site had been remediated. The site is not fenced and access is not restricted. Most of the former facility was demolished in Spring 2008 leaving only the first floor (and sumps, pits, accessways, and drains) and basement as well as the former office, garage, and locker room buildings. This OSC conducted a removal site evaluation to determine if the Site was continuing to threaten release of hazardous substances to the environment despite past efforts to remove hazardous substances from the Site.

M. A removal site evaluation was initiated June 3, 2008, along with WVDEP, after receiving permission from the present owner to conduct the evaluation. The owner provided assistance with heavy equipment to improve access to certain sample locations (concrete debris was located in a stairwell to the basement and a pile was located on top of a manhole).

N. This OSC and WVDEP found the upper floors of the facility nearly completely demolished in June 2008. The OSC and WVDEP identified several sumps and drainage features on the first floor containing sediment/sludge, including features identified (based upon pictures) during removal site evaluations in 2004. The OSC and WVDEP also identified a basement containing numerous drums. The basement was flooded with about 12 inches of water covered by an unknown black oily substance. The OSC presumes that black oily substance is oil. In 2004, a basement oil sample was collected and indicated 6.6 mg/kg PCB. The integrity or contents of the drums in the basement could not be definitively determined due to the lack of electricity, flooded basement conditions, and presence of an oily substance throughout the basement. It is entirely likely that the drums identified in 2008 include drums seen above the water line in 2004 and that the oil within the basement identified in 2008 includes the oil identified and analyzed in 2004.

O. On June 3 and June 26, 2008, the OSC directed the collection of multiple samples from the Site. The

sample locations intended to allow the OSC to determine if hazardous substances which may be located at the Site are migrating from the Site through drainage pathways such as storm drains and sewer drains.

P. Validated analytical results of samples collected in June 2008 of basement water and the sediment/sludge within the sumps and drainage features contained several PCB aroclor contaminants. PCB aroclors are hazardous substances within the meaning of CERCLA because they are listed in Section 302.4 of the NCP, 40 C.F.R. § 302.4. PCB was found as follows (using nomenclature derived from review of Site files):

- Flooded Basement (boiler area) water: 7.8 ug/L
- Debris from basement (boiler area) floor: 2.6 mg/kg
- Flooded Compressor room vault water: 3.6 ug/L
- Degreaser Area floor drain sediment: 16.1 mg/kg
- Yard Area Storm Drain sediment: 0.34 mg/kg
- Floor Drain sediment in High Voltage Area: 84 mg/kg
- Sediment from within suspected facility sanitary sewer: 11.9 mg/kg

Q. The OSC determined (by comparing present and historical basement water levels) that the contaminated basement water has migrated from the facility. Since the basement includes a locker room and toilet area, it is likely that the drainage from the basement is to the area sewer system, but this is unknown. Since the basement includes a boiler (which would have condensate) it is likely that the boiler room area would also have a drain, but this too is unknown.

R. Dye tracing performed by WVDEP verified that on-Site storm drainage features are connected to nearby storm water drainage systems which ultimately flow to Bluestone River via Whitley and Beaverpond Creeks. Dye tracing of other on-Site drainage systems has not been successfully completed at this time. It is unknown if other PCB contaminated drainage systems enter the area storm or sanitary systems.

S. The poor condition of the former building and the present lack of a building and roof provide the opportunity for stormwaters that migrate through the sumps and drainage areas of the Site to enter the storm drainage system. This allows for the migration of PCB from the facility.

T. EPA START contractors entered the basement and verified the presence of thirty eight (38) drums in a former boiler room and locker room area. The drums are in poor condition. Some are believed to be empty. Others contain unknown contents.

Current Activities

This OSC finds that PCBs remain at the unused Site at concentrations potentially exceeding typical cleanup levels protective of human health and environment pursuant to TSCA. This OSC determines that elevated concentrations of PCB appear to be located at the Site in drainage pathways that lead to Bluestone River. Some of these PCBs have already likely migrated from the Site into the surface water environment. Presently, there is an increased likelihood that the PCB at the Site will continue to migrate (due to the extreme deterioration or removal of structures that may inhibit migration of PCB). The OSC has observed storm water passing over/through contaminated areas of the Site and entering storm and sanitary drains. This action may serve to flush high concentrations of PCB into storm or sanitary systems.

On July 23, 2008, EPA Region III signed a request for Additional Funding, Change in Scope, and Exemption from Statutory Limits upon removal actions (Action Memorandum). The Action Memorandum authorizes field activity to address the threats identified at the Lin Electric Company Site.

Planned Removal Actions

The Removal Action planned for the Site will address the PCB-contaminated water and oil remaining in the basement, remove the drums and their contents, and minimize the off-Site migration of PCB through drainage pathways. Additionally, the Removal Action will include disposal of wastes. The scope of the Removal Action is contained within the Action Memorandum.

The On-Scene Coordinator will also conduct continued removal site evaluation to determine the extent of remaining contamination and the degree of contamination in nearby surface waters.

Next Steps

Coordinate access to the Site.

Develop a schedule for initiation of the on-Site Removal Action. A Site visit is planned for July 30, 2008.

response.epa.gov/linelectric